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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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**In the Matter of:** Request of Rocky Mountain  
Power for a Limited Stay of Schedule 38  
Qualifying Facility Procedures

**DOCKET NO. 14-035-65**

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Comments from Ros Rocco Vrba, for Energy of Utah

On May 22, 2014, Rocky Mountain Power, a division of PacifiCorp, filed a request for a limited stay of a provision of Electric Service Schedule No.38, Qualifying Facility Procedures.

Specifically, PacifiCorp requested the Commission to grant PacifiCorp a limited stay (90 days) of the requirement of Schedule 38, paragraph I.B.3, which requires PacifiCorp to provide indicative pricing to prospective qualifying facilities within 30 days of the completion of all requirements of paragraph I.B.2.

We believe this request to be unjust for existing indicative price requests and we ask the Public Service Commission to require PacifiCorp to provide immediate corrective action.

Energy of Utah requested an Indicative price for Parowan Solar on March 30, 2014. Indicative price requests, as described by Schedule 38 “may be used by the owner to make determinations regarding project planning, financing and feasibility”. They provide essential preliminary

information, and as of June 6, 2014 we are unable to continue the planning of a project that must be completed by December 31, 2016, if developers and ratepayers are to receive the full benefits of the Federal Investment Tax Credit.

We believe that the delay to date, and approval for the request for a stay of the 30 day requirement, may harm Energy of Utah's ability to develop a financially viable Schedule 38 project.

Submitted Respectfully, Ros Rocco Vrba

This document will be submitted electronically to:

Gary Widerburg, Public Service Commission [gwiderburg@utah.gov](mailto:gwiderburg@utah.gov)

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by email this 29th day of June 6, 2014 on the following:

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Ros Rocco Vrba for Energy of Utah

June 6, 2014