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## **BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Rocky Mountain Power for Approval of Purchase and Transfer Agreement and Power Supply Agreement with Navajo Tribal Utility Authority and Amendment of Certificate of Public Convenience and Necessity

## Docket No. 15-035-84

## JOINT MOTION FOR SUSPENSION OF PROCEDURAL SCHEDULE

PacifiCorp, doing business as Rocky Mountain Power ("Rocky Mountain Power" or the "Company"), the Navajo Tribal Utility Authority ("NTUA"), Resolute Natural Resources Company ("Resolute") Utah Office of Consumer Services, and Utah Division of Public Utilities (together, the "Parties") jointly request that the Public Service Commission of Utah (the "Commission") suspend the procedural schedule in the above captioned matter based on the

execution of new amendments to the agreements between Rocky Mountain Power and NTUA,

while keeping in place the currently scheduled hearing dates of May 19-20, 2016, and public witness days of May 17 and 19, 2016. In support of their Motion, the Parties state as follows:

1. On January 12, 2016, the Commission issued its Scheduling Order in this docket, which established a deadline of April 7, 2016, for the filing of direct testimony in this matter; a May 4, 2016, deadline for rebuttal testimony; a May 16, 2016, deadline for surrebuttal testimony; and hearings on May 19-20, 2016.

2. Following the issuance of the Scheduling Order, Rocky Mountain Power continued to meet with NTUA and Resolute to address issues raised by Resolute at the technical conference that was held on February 9, 2016.

3. Rocky Mountain Power, NTUA, and Resolute have now reached an agreement on amendments that will allow for the approval of the transfer of assets to NTUA while providing certainty to Resolute for its electric service by NTUA. Resolute has indicated it is in agreement with the revised agreements between Rocky Mountain Power and NTUA, and will not oppose the application for its approval by the Commission.

4. Rocky Mountain Power anticipates filing with the Commission a revised Application reflecting the new amendments to the agreements shortly.

5. In light of these amended agreements, the Parties request that the Commission suspend the procedural schedule in this Docket until the revised Application has been filed with the Commission and the Parties have an opportunity to review. To facilitate this review, a meeting has been scheduled with Parties on April 5, 2016. This will allow Rocky Mountain Power and NTUA to discuss the revised agreement with Resolute, the Division of Public Utilities, the Office of Consumer Services and other interested parties, while keeping in place the currently scheduled hearing dates and the public witness days established. The Parties anticipate

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proposing a revised procedural schedule for the filing of direct and rebuttal testimony after the Parties meet.

6. The Parties believe that suspending the procedural schedule will facilitate more efficient resolution of this matter, and that the relief requested is just, reasonable and in the public interest. Rocky Mountain Power has been authorized by the other Parties to state that they are in agreement with and support the Joint Motion.

For the reasons set forth herein, Rocky Mountain Power respectfully requests that the Commission grant this Joint Motion, and issue an order suspending the procedural schedule in this proceeding until further notice.

DATED: March 30, 2016.

Respectfully submitted,

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