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Salt Lake City, Utah 84111

April 30, 2015

***VIA ELECTRONIC FILING  
AND HAND DELIVERY***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111

Attn: Gary Widerburg  
Commission Secretary

**RE: Advice Filing 15-07 – Schedule 37  
Avoided Cost Purchases from Qualifying Facilities (QF)**

In its February 12, 2009 order, in Docket No. 08-035-78 on Net Metering Service, the Public Service Commission of Utah (“Commission”) directed Rocky Mountain Power (the “Company”) to calculate and file Schedule 37 avoided costs annually in order to establish the value or credit for net excess generation of large commercial customers under Schedule 135 Net Metering Service. In its November 28, 2012 order in Docket No. 12-035-T10, the Commission directed that future annual filings should be made within 30 days of filing the Company’s Integrated Resource Plan (“IRP”) or IRP Update, or by April 30 of each year, whichever occurs first. Finally, in its letter to the Company, dated March 2, 2015 in Dockets No. 14-035-55 and 14-035-T-04, the Commission indicated that potential future consideration of capacity costs based on a simple cycle combustion turbine (“SCCT”) during the period in which the Company has sufficient resources to meet its energy requirements may occur in connection with the Company’s next Schedule 37 update.<sup>1</sup>

Pursuant to Commission Rules R746-405 and as directed by the Commission in the orders referenced above, the Company hereby updates the inputs to the calculation of Schedule 37 rates and proposes one change to the way avoided costs are calculated for Schedule 37, consistent with the Direct Testimony of Mr. Brian S. Dickman and four appendices, submitted herewith for filing in the above referenced matter. An original and ten (10) copies of this filing will be provided via hand delivery. The Company will also provide electronic versions of this filing to [psc@utah.gov](mailto:psc@utah.gov).

The enclosed proposed tariff sheets are associated with Tariff P.S.C.U No. 50 of PacifiCorp, d.b.a. Rocky Mountain Power, applicable to electric service in the State of Utah. Pursuant to the

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<sup>1</sup> Letter to Mr. Jeffrey K. Larsen from the Public Service Commission of Utah, dated March 2, 2015 in Dockets No. 14-035-55 and 14-035-T-04, footnote 1.

requirement of Rule R746-405D, PacifiCorp states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. PacifiCorp will also provide an electronic version of this filing to [psc@utah.gov](mailto:psc@utah.gov).

PacifiCorp respectfully requests an effective date of July 1, 2015.

Third Revision of Sheet No. 37.3	Schedule 37	Avoided Cost Purchases From Qualifying Facilities
Third Revision of Sheet No. 37.4	Schedule 37	Avoided Cost Purchases From Qualifying Facilities
Second Revision of Sheet No. 37.5	Schedule 37	Avoided Cost Purchases From Qualifying Facilities
Second Revision of Sheet No. 37.6	Schedule 37	Avoided Cost Purchases From Qualifying Facilities
Second Revision of Sheet No. 37.7	Schedule 37	Avoided Cost Purchases From Qualifying Facilities

Through this filing the Company requests that avoided cost prices under Schedule 37 during the sufficiency period no longer include capacity costs related to the deferral of a SCCT, as more specifically proposed in Mr. Dickman's testimony.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred)

[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
[bob.lively@pacificorp.com](mailto:bob.lively@pacificorp.com)

By Regular Mail

Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Bob Lively at (801) 220-4052.

Very truly yours,

Jeffrey K. Larsen  
Vice President, Regulation

Enclosures