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## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's	<b>Доскет No. 15-035-Т06</b>
Proposed Revisions to Electric Service	
Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities	Utah Clean Energy – Comments Requesting Scheduling Conference

Pursuant to the Commission's *Notice of Filing and Comment Period* issued May 1, 2015, Utah Clean Energy hereby files these comments, respectfully requesting a scheduling conference in docket 15-035-T06.

On April 30, 2015, Rocky Mountain Power ("the Company") filed updates to QF pricing contained in the Schedule 37 tariff, consistent with scheduling directions provided by the Commission in prior orders. In addition to updating the inputs to the calculation of Schedule 37 "avoided cost" rates, the Company also proposed a change in the method for calculating Schedule 37 rates. The Company supported this proposed methodological change with testimony from Brian S. Dickman, including non-confidential as well as confidential appendices. On May 1, the Commission issued a *Notice of Filing and Comment Period*, inviting comments and reply comments by May 15 and 22, respectively.

In lieu of substantive comments, Utah Clean Energy respectfully requests that the Commission issue a scheduling order in this docket to provide interested parties an opportunity to intervene, sign a protective order, review the confidential portions of the filing, ask discovery requests and participate in a technical conference. The application the Company filed is different than a typical tariff update—in which the Company merely updates the inputs used to calculate Schedule 37 rates; rather, the Company has proposed a methodological shift and filed testimony and exhibits in support of this new method. Utah Clean Energy requests that the Commission provide additional time and process to allow us and other parties to investigate the analysis and assumptions underlying the Company's application.

Utah Clean Energy has spoken with the Division of Public Utilities and has been authorized to represent that the Division supports suspending the current comment deadlines and noticing a scheduling conference in this matter. Further, Utah Clean Energy has spoken with the Office of Consumer Services and the Utah Association of Energy Users, who likewise support the Commission noticing a scheduling conference. Therefore, Utah Clean Energy requests that the Commission notice a scheduling conference for further proceedings in this matter.

> Respectfully submitted, UTAH CLEAN ENERGY

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