

December 11, 2018

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: Docket No. 18-035-41
Power Purchase Agreement between PacifiCorp, dba Rocky Mountain Power, and
Kennecott Utah Copper LLC, (Refinery)
Reply Comments

On November 8, 2018, the Public Service Commission of Utah (“Commission”) issued a Scheduling Order and Notice of Hearing (“Scheduling Order”) which determined deadlines for comments and reply comments on Rocky Mountain Power’s (“Company”) October 26, 2018 Application for Approval of the Power Purchase Agreement between PacifiCorp and Kennecott Utah Copper LLC – Refinery (“Report”). Per the Scheduling Order, the Division of Public Utilities (“Division”) submitted comments on December 5, 2018. The Company hereby submits reply comments below.

The Division recommends the Commission approve the purchase power agreement between the Company and Kennecott Utah Copper, LLC related to the operations at its refinery facility contingent on the following recommendations:

1. The Company continue to provide, at least quarterly, hourly power purchased so that the Division can continue to monitor the contract.
2. The Company at the time of future PPA filings, provide to the Division and Office of Consumer Services the GRID outputs and Excel spreadsheets supporting the price calculations along with the spreadsheets showing avoided line loss calculations with formulas intact.

Both of these recommendations are existing requirements and the Company agrees to continue to comply with these recommendations. The Division also makes a new recommendation based on its observation that the nameplate capacity rating of the plant is 7.54 megawatts (“MW”) with an expected average monthly output of approximately 5.4 MW. However, as configured the actual capacity of the plant is about 6.20 MW. This led the Division to make the following additional recommendation:

3. The Company include the capacity distinction preferably, in the contract itself, or at a minimum in the application to avoid potential confusion.

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The Company agrees to this recommendation and will include the information in the application or contract, as appropriate.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joelle Steward". The signature is fluid and cursive, with the first name "Joelle" and last name "Steward" clearly distinguishable.

Joelle Steward
Vice President, Regulation

CC: Service List - Docket No. 18-035-41

CERTIFICATE OF SERVICE

Docket No. 18-035-41

I hereby certify that on October 26, 2018, a true and correct copy of the foregoing was served by electronic mail and/or overnight delivery to the following:

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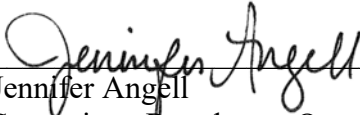
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Jennifer Angell
Supervisor, Regulatory Operations