



We Partner to Build the New Clean Energy Economy

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

To: Utah Public Service Commission

From: Utah Clean Energy
Kate Bowman, Renewable Energy Program Manager

Date: May 15, 2019

Re: Docket No. 19-035-18
Rocky Mountain Power's 2019 Avoided Cost Input Changes Quarterly
Compliance Filing

Dear Public Service Commission,

On April 30, 2019, Rocky Mountain Power (The Company) filed the Q1 2019 Avoided Cost Input Changes Quarterly Compliance Filing. Utah Clean Energy's comments address a specific change noted in this filing that is not adequately explained by the Company. Our silence on other aspects of this filing does not indicate Utah Clean Energy's support for these changes.

Appendix A, "Description of Avoided Cost Input Changes 2019.Q1 – April 2019" identifies model assumptions that have been updated since the Company's 2018.Q4 filing. One of the changes identified by the company is an update to the capacity of the proxy avoided cost thermal resource. The Company's filing explains that "The avoided cost thermal resource is 100 megawatt ("MW") with a **100** percent capacity factor and is located in the Utah North

transmission bubble.”¹ The assumption that an avoided cost thermal resource has a 100 percent capacity factor is a change from the 2018.Q4 avoided cost compliance filing, in which the avoided cost thermal resource had an 85 percent capacity factor.²

A 100 percent capacity factor indicates that the proxy resource will never operate at reduced output or be taken out of service for scheduled or unscheduled maintenance. The Company’s filing does not include an explanation of why the Company has chosen to change the capacity factor of the proxy thermal resource to 100%. Utah Clean Energy respectfully requests that the Commission ask the Company to explain their rationale for making this change.

With best regards,

/s/ Kate Bowman

Kate Bowman, Solar Project Coordinator
Utah Clean Energy

CC: Service List – Docket No. 19-035-18

¹ Docket 19-035-18, RMP’s 2019.Q1 Quarterly Compliance Filing, April 30, 2019. Page 7

² Docket 18-035-23, RMP 2018.Q4 Quarterly Compliance Filing, March 20, 2019. Page 7.

CERTIFICATE OF SERVICE

I certify that on May 15, 2019, a true and correct copy of the foregoing was served upon the following as indicated below:

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