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State of Utah

Department of Commerce

Division of Public Utilities

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REQUEST FOR EXTENSION

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Doug Wheelwright, Technical Consultant Supervisor

Justin Christensen, Utility Analyst

Bob Davis, Utility Technical Consultant

Abdinasir Abdulle, Utility Technical Consultant

Date: January 29, 2019

Re: **Docket No. 19-035-18**, RMP Quarterly Compliance Filing – 2019.Q3 Avoided Cost Input Changes. **(Request for Extension).**

On January 10, 2020, Rocky Mountain Power (“RMP”) filed its Quarterly Compliance Filing – 2019.Q3. This filing reports changes since the RMP’s 2019.Q2 Quarterly Compliance Filing dated September 30, 2019. On January 10, the Commission issued an Action Request to the Division requesting the Division to review the application for compliance, make recommendations, and to report back by January 30, 2020. Furthermore, the Commission Order dated June 9, 2015 in Docket No. 14-035-140 requires that “...parties will file a notice with the Commission within three weeks after the Company files its quarterly compliance filing, to identify which specific assumptions, if any, they intend to contest.” The three weeks ends on January 30, 2020.

While reviewing RMPS's 2019.Q3 Compliance filing, the Division noticed that the avoided cost prices have changed significantly between RMP's 2019.Q2 and 2019.Q3 Quarterly Compliance filings. The Division is investigating the non-routine change in the Utah wind resource deferral. The Division met with RMP on January 24, 2020 to discuss what is driving this price change. The Division would like more time to complete its investigation.

The Division recognizes that without challenge the non-routine changes will take effect 21 days after the filing pursuant to the June 9, 2015 Order in Docket No. 14-035-140 and the Division is not requesting a suspension of the tariff or scheduling conference at this time to challenge the updates. The June 9, 2015 Order provides that parties may later challenge an update if appropriate and the Division will make a recommendation to the Commission after further investigation and review. Therefore, the Division respectfully requests the Commission extend the due date of the Action Request from January 30, 2020 to February 14, 2020. This will allow the Division additional time to conduct a more thorough review of RMP's filing. The Division is not requesting a scheduling conference at this time.

Cc: Jana Saba, RMP
Michele Beck, OCS