

Roger Swenson
Vice President of Regulatory Affairs
Pioneer Ridge LLC
1592 East 3350 South
Salt Lake City, Utah 84116

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF PACIFICORP FOR THE APPROVAL OF AN IRP BASED AVOIDED COST METHODOLOGY FOR QF PROJECTS LARGER THAN 1 MW	Docket No. 03-035-14
---	----------------------

**RESPONSE TO PACIFICORP'S MOTION TO STRIKE PORTIONS OF TESTIMONY
OF ROGER J. SWENSON AND REQUEST FOR EXPIDITED TREATMENT**

Dated this 16th day of February 2006.

Roger J. Swenson
Vice President Regulatory Affairs, Pioneer Ridge, LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

The following is a response by Pioneer Ridge, LLC (Pioneer) to the Motion to Strike portions of the testimony of Roger J. Swenson filed by Pacificorp on February 14, 2006.

Pioneer has reviewed the motion filed by Pacificorp and is somewhat surprised by the response. The understanding that Pioneer had from the scheduling conference held on January 4, 2006 in which Pioneer participated by phone was that the Commission Staff was not explicitly ruling out any other issues that Parties felt that it was important to bring to light in this matter. It was not Pioneer's intent to bring up issues that could not be adequately addressed in this final discussion of matters concerning this case. It was Pioneer's intent to give all Parties a clear understanding of where the methodology for making adjustments to pricing for wind project profiles stands at this time.

Pioneer's methodology for adjusting pricing from the wind proxy contract price to the specific wind QF site requesting pricing was meant to be clear and transparent. It simply takes the proxy project price and converts the flat price into a price for specific periods. The price as converted into specific periods will provide the same average cost on an annual basis for the proxy plant. Once the pricing has been converted into periods then the wind QF operating profile is then applied to those specific period prices. The average price can then be calculated for the wind QF at its operating profile.

Our concerns were brought to light when another party asked what specific basis was used to derive the adjustment algebraic adjustments in the example as provided. Pioneer expected that no Parties in this case would have an issue with using updated inputs to the methodology to take into account the work that has been done in this case.

1 We did believe it may be prudent to tell the Commission and all parties what we intended
2 to do. In our mind this would be no different than using updated energy price forecast, as
3 it became they official forward price curve in the DRR model. I also would not expect it
4 to be an issue if Pacificorp altered the topology of the DRR model to be more granular to
5 become more precise. The testimony provide by Pioneer concerning its adjustment
6 model as filed is not a new model but an explanation to show all parties what the starting
7 point should look like at this time for clarity.

8 Pacificorp asks the Commission to send an important message that to Parties that
9 proceedings should be conducted in an efficient and effective manner. Pioneer
10 respectfully understands this, as it has been trying to obtain appropriate pricing and a
11 contract for its wind project for over year before this Commission. It is not our intention
12 to offer impediments to this process but to simply provide clarity and information in the
13 most efficient manner it can so that the process can move forward quickly.

14 In that light Pioneer withdraws its testimony filed on February 12, 2006. As
15 Pacificorp states Pioneer will have an opportunity to provide this update to its
16 methodology with new pricing based on the DRR off peak price and increased precision
17 when it files its contract for approval before this Commission.

