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Representing Wasatch Wind

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>IN THE MATTER OF THE PETITION OF WASATCH WIND, LLC FOR APPROVAL OF A CONTRACT FOR THE SALE OF CAPACITY AND ENERGY FROM THEIR PROPOSED QF FACILITIES</p> <p>IN THE MATTER OF THE APPLICATION OF PACIFICORP FOR APPROVAL OF POWER PURCHASE AGREEMENT BETWEEN PACIFICORP AND SPANISH FORK WIND PARK 2, LLC</p>	<p>DOCKET NO. 06-035-42 DOCKET NO. 06-035-76</p> <p>PETITION FOR DELAY AND REQUEST FOR A TECHNICAL CONFERENCE AND RE-SCHEDULING OF PROCEEDINGS JULY 14, 2006</p>
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Wasatch Wind hereby submits the following petition for Commission consideration,
we request a prompt reply.

DATED this 16th day of August, 2006.

Richard S. Collins

/s/ _____
Richard S. Collins
Representing Wasatch Wind

CERTIFICATE OF SERVICE

1 I hereby certify that a true and correct copy of the foregoing was sent by
2 United States mail, postage prepaid, or by email this 11 day of, July 2005, to the following:

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4 Michael Ginsberg
5 Patricia Schmid
6 Utah Division of Public Utilities
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9 Salt Lake City UT 84111
10 mginsberg@utah.gov
11 pschmid@utah.gov

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13 Reed Warnick
14 Paul Proctor
15 Committee of Consumer Services
16 Heber M. Wells BLDG, 5th Floor
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18 Salt Lake City, UT 84111
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44 Wasatch Wind petitions the Commission for a delay in the proceedings to

1 determine avoided line losses associated with the provision of energy and capacity from
2 the Spanish Fork Wind Park 2 facilities to Rocky Mountain Power. In addition, we
3 request a technical conference be scheduled as soon as possible to discuss a proper
4 procedure for determining line losses and to obtain information in a more efficient
5 manner than the current data request process. Wasatch Wind requests that Commission
6 staff be included in the technical conference to insure that the information that the
7 Commission needs to make a determination of possible line losses is included in the
8 analysis and becomes part of the record through testimony.

9 There are a number of reasons that Wasatch Wind is making this request. First, it
10 is our contention that a delay in the proceedings will not cause material harm to any party
11 and the additional information gathered will provide a better record on which the
12 Commission can make a decision. Wasatch Wind has conferred with the Division and
13 the Committee and they do not oppose a delay in the schedule. Rocky Mountain Power
14 has agreed to a technical conference, but as of this filing opposes a delay in the
15 proceeding even though there will be no material or financial harm to the Company from
16 the delay. The wind facility is slated to be operational in late 2007 or early 2008.

17 One of the main reasons for the request to delay is the difficulty Wasatch Wind
18 has experienced getting technical support for the analysis necessary for testimony. The
19 Commission has already heard evidence on avoided line losses and the testimony
20 provided did not meet the Commission requirements to make a decision that would keep
21 ratepayers neutral. Wasatch Wind determined that in order to meet the Commission
22 requirements, additional expertise would be need for this proceeding. We contacted local
23 consulting and engineering firms about representing us in this proceeding. Our contacts

1 within these organizations were initially very interested in doing the analysis. They
2 appeared to be perfect candidates as they had substantial experience working with
3 PacifiCorp's transmission system, their initial analysis indicated the possibility of
4 substantial line loss savings to the Company from the purchase of energy from our
5 facility. After some delay and further consultation with their superiors, they declined to
6 offer their services. One engineering consulting firm had recently signed a no compete
7 agreement with Rocky Mountain Power which would not allow them to represent a party
8 in opposition to Rocky Mountain Power. Another entity does substantial business with
9 Rocky Mountain Power and it was fearful of jeopardizing that financial relationship.
10 Wasatch Wind was forced to look outside the local consulting industry to find help. After
11 considerable efforts, we have finally secured the services of Michael Unger of Elcon and
12 Associates and have been trying to amass the necessary information to do our analysis.
13 Although acquainted with the Pacific Power and Light system, the Portland Oregon based
14 Elcon and Associates does not have any experience with the transmission system in the
15 eastern part of the PacifiCorp system. This puts us at a severe disadvantage and we have
16 made numerous data requests to obtain the necessary information. Unfortunately, the
17 data request process has bogged down and we feel we do not currently have the requisite
18 data to perform our analysis.

19 The analysis will require data concerning the exact configuration of the
20 transmission system between the QF facilities and local Rocky Mountain Power loads
21 and the same for the proxy plant. It will also require information about what other plants
22 or purchases might be backed down during the production of the QF facility. The
23 answers to the data requests have not allowed our consultant enough information or time

1 to successfully model that analysis and there are still questions about how to interpret the
2 answers. Our data request (1.7 PC) requested the name of a contact person within
3 PacifiCorp with technical skills and information needed to appropriately answer follow
4 up questions. PacifiCorp responded that all requests for information should be sent to
5 datarequest@pacificorp.com. In follow up telephone conversation with Rocky Mountain
6 Power counsel, we were informed that the Company would support a technical
7 conference but counsel maintained that all data requests must go through the formal data
8 request procedure which has a 14 day response date. Our delay in obtaining competent
9 expert witnesses and the use of the formal data request process has hampered our ability
10 to obtain data and perform an analysis. As a result we are not prepared to present our full
11 analysis by the filing date for Direct Testimony currently scheduled for August 18, 2006

12 We request that the Commission set aside the filing dates for testimony and for
13 hearing and instead set up a technical conference to discuss the issues. After the technical
14 conference, a new schedule for testimony and hearing dates can be determined. This
15 delay although opposed by the Company will allow parties more time to obtain the
16 requisite data and perform the necessary analysis. This will provide a more informed
17 record on which the Commission can make a decision.

18

19 DATED this 16th day of August, 2006.

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Richard S. Collins

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/s/ _____

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Richard S. Collins

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Representing Wasatch Wind