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*Milford Wind Corridor Phase I, LLC and*  
*Milford Wind Corridor Phase II, LLC*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of PacifiCorp for Approval of an Electric Service Agreement for Milford Wind Corridor Phase II, LLC.	<b>REQUEST FOR EXPEDITED HEARING</b>  Docket No. 11-035-17
In the Matter of the Application of PacifiCorp for Approval of an Electric Service Agreement for Milford Wind Corridor Phase I, LLC.	<b>REQUEST FOR EXPEDITED HEARING</b>  Docket No. 09-035-55

Pursuant to the Rule R746-100-10(A) of the Public Service Commission's Rules of Practice and Procedure, Milford Wind Corridor Phase I, LLC, ("Milford I") and Milford Wind Corridor Phase II, LLC, ("Milford II"), hereby request that Public Service Commission ("Commission" or "PSC") set for expedited hearing the following Motions in the above captioned dockets:

Docket No. 09-035-55 – Motion of Milford Wind Corridor Phase I, LLC for an Interim Order Authorizing a Change in the Point of Metering or, in the Alternative, for Expedited Treatment of RMP'S Motion for Approval of First Amendment to Electric Service Agreement.

Docket No. 11-055-17 – Motion of Milford Wind Corridor Phase II, LLC for an Interim Order Authorizing Rocky Mountain Power to Provide Electric Service or, in the Alternative, for Expedited Treatment of Rocky Mountain Power’s Application

The basis for requesting expedited hearing on the Motions is as follows:

1. On or about January 27, 2010, Milford II requested 345 KV electric service from Rocky Mountain Power (“RMP”). Due to delays occasioned by PacifiCorp, including its need to obtain engineering studies and to secure a wholesale supply of power to serve Milford II; and due to further delays occasioned by the need for RMP’s wholesale supplier, Los Angeles Department of Water and Power (“LADWP”), to obtain approval from the City of Los Angeles of a wholesale power purchase agreement with PacifiCorp, the Milford II MESA could not be submitted to the Commission for approval until January 24, 2011. As a result, RMP’s Application for Approval of the Milford II MESA comes before the Commission nearly one full year after Milford II requested service from RMP.

2. Milford II is constructing and desires to commence operation of a 102 MW wind generation project located in RMP’s service territory in Millard and Beaver Counties, Utah. As with the generation project of its affiliate, Milford Wind Corridor Phase I, LLC (“Milford I”), the output of the Milford II generation facilities will be sold at wholesale to SCPPA under the terms of a power purchase agreement dated March 1, 2010, and will be consumed by customers of SCPPA-affiliated municipalities in Southern California. Under its wholesale power purchase agreement with SCPPA, Milford II must begin commercial operation and commence deliveries in April, 2011. Commissioning and testing of the turbines must be completed before such deliveries can begin, and commissioning and testing cannot begin until Milford II can get electric service from RMP.

3. In order to meet the date of commercial operation, Milford II had scheduled to commence commissioning and testing its first array of wind turbines on January 17, 2011. Due to the delay in finalizing the Milford II MESA and submitting it for Commission approval, Milford II has been forced to postpone commissioning the turbines until the week of January 24, 2011. Any further delay will place Milford II in jeopardy of missing the deadline for commencement of service under its PPA with SCPPA, which would result in extreme hardship to Milford II.

4. Milford II has filed its Motion for an Interim Order Authorizing RMP to Provide Electric Service so that Rocky Mountain Power may commence service to Milford II immediately, on an interim basis, while the parties prepare this matter for a final hearing on the Application to approve the proposed Milford II MESA.

5. With the commencement of service to Milford II, the metering location for power delivered to Milford I must be changed from the point of interconnection at the Intermountain Power Project in Delta, Utah, to the Milford Valley Wind Collector Station South (“Collector Station”) so that the power delivered to Milford I can be metered separately from the power that will be delivered to Milford II. Accordingly, Rocky Mountain Power has filed a Motion To Approve the First Amendment to its Electric Service Agreement with Milford I (“Milford I MESA”). (Docket No. 09-035-55). That Amendment would change the point of metering to the Collector Station for the Milford I MESA.

6. In light of Milford II’s urgent need for electric service, its affiliate, Milford I, has filed a Motion for an Interim Order Authorizing a Change in the Point of Metering, while the parties prepare their responses to RMP’s Motion to Approve the First Amendment to the Milford

I MESA. Milford I requests expedited hearing on its Motion so that service may begin as soon as possible to Milford II.

7. Milford I and Milford II regret that they are in the position of having to move the Commission for interim orders, and also having to request expedited hearing on those motions. But, any delay in Rocky Mountain Power commencing electric service to Milford II places Milford II at risk of substantial economic hardship.

WHEREFORE, for the foregoing reasons, Milford I and Milford II respectfully request that the Commission set the Motions for hearing at the earliest available opportunity.

DATED this 24th day of January, 2011.

/s/ William J. Evans  
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Attorneys for  
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Milford Wind Corridor Phase II, LLC

## CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of January, 2011, I caused a copy of the foregoing **REQUEST FOR EXPEDITED HEARING**, in Docket Nos. 11-035-17 and Docket No. 09-035-55, to be sent via electronic mail to the following:

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/s/ Colette V. Dubois \_\_\_\_\_