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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power for Approval of Electric Service Agreement between Rocky Mountain Power and Milford Wind Corridor Phase I, LLC.

**MOTION OF MILFORD WIND CORRIDOR PHASE I, LLC FOR 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. 09-035-55

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Pursuant to Rule 746-100-3.H of the Public Service Commission's Rules of Practice and Procedure, Milford Wind Corridor PHASE I, LLC, ("Milford I"), hereby moves the Public Service Commission ("Commission" or "PSC") for an interim order approving a change in the point of metering of electric power provided by Rocky Mountain Power ("RMP" or the "Company") under the Master Electric Service Agreement between RMP and Milford I ("Milford I MESA") pending a final order on RMP's Motion for Approval of First Amendment to Electric Service Agreement.

In support of this Motion, Milford I states as follows:

1. Milford I currently receives electric service from RMP under the Milford I MESA, which was approved by the Commission in this docket on August 27, 2009.

2. Milford I currently receives power from RMP at the point of interconnection of Milford I's high voltage transmission line with the busbar of the Intermountain Power Project ("IPP"), at Delta, Utah. The power is measured through a backfeed revenue meter installed at the point of interconnection.

3. Milford I's affiliate, Milford Wind Corridor Phase II, LLC ("Milford II"), is constructing and intends to commence operation of a wind generation project located in RMP's service territory in Millard and Beaver Counties, Utah. Similar to Milford I, Milford II has requested to receive retail electric service from RMP to supply its station service needs.

4. Now that Milford II has requested electric service from RMP, the metering location for power delivered to Milford I must be changed from the point of interconnection at IPP 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, RMP and Milford I have entered into a First Amendment to the Milford I MESA ("Milford I Amendment"), to reflect the change in location of the backfeed revenue meter from the point of interconnection at IPP to the Collector Station.

5. On January 24, 2011, RMP filed with the Commission a Motion for Approval of the Milford I Amendment. Simultaneously, RMP filed an Application for Approval of an Electric Service Agreement with Milford II ("Milford II MESA") (Docket No. 11-035-17). Because of Milford II's construction schedule and its commitment to begin delivery of power to its wholesale customer, Milford II has filed in Docket No. 11-035-17, a Motion for an Interim

Order Authorizing RMP to Provide Electric Service (“Milford II’s Motion for Interim Order”), pending a final order on RMP’s Application for Approval of the Milford II MESA.

6. If the Commission grants Milford II’s Motion for Interim Order and Milford II thus begins receiving electric service from RMP, it will be necessary to change the metering location for power delivered under the Milford I MESA so that the power delivered to Milford I and Milford II can be measured and billed separately. As of the date of this Motion, backfeed revenue meters already have been installed at the Collector Station, and are ready to be put into service to meter the power delivered to Milford I.

7. Milford I requests that the Commission issue an interim order in the present docket allowing RMP and Milford I to change the location of metering under the Milford I MESA from the IPP backfeed revenue meter to the Collector Station backfeed revenue meters, pending the Commission’s final order on RMP’s Motion for Approval of the First Amendment to the Milford I MESA

8. Milford I respectfully requests that the Commission consider Milford I’s Motion for Interim Order in the present docket simultaneous with its consideration of Milford II’s Motion for an Interim Order in Docket No. 11-035-17, and grant the interim relief requested in both dockets.

9. In the alternative, should the Commission decline to grant Milford II’s Motion for an Interim Order authorizing RMP to commence retail service to Milford II in Docket No. 11-035-17, Milford I requests that the Commission consider RMP’s Motion for Approval of the First Amendment to the Milford I MESA on an expedited basis so that the change in the metering point for Milford I’s service can occur simultaneous with RMP’s commencement of electric service to Milford II.

WHEREFORE, Milford I respectfully requests that the Commission issue an interim order authorizing RMP and Milford I to immediately change the metering point for service under the Milford I MESA from IPP to the Collector Station, pending the issuance of a final order on RMP's Motion for Approval of the First Amendment to the Milford I MESA, or in the alternative, to expedite its consideration of this Motion so that the change in the metering point for Milford I's service will occur simultaneous with RMP's commencement of electric service to Milford II.

DATED this 24th day of January, 2011.

/s/ William J. Evans  
WILLIAM J. EVANS  
PARSONS BEHLE & LATIMER  
Attorneys for Milford Wind Corridor PHASE  
II, LLC

**CERTIFICATE OF SERVICE**

(Docket No. 9-035-55)

I hereby certify that on this 24<sup>th</sup> day of January 2011, I caused to be sent by electronic mail and by U.S. Mail, postage prepaid, a true and correct copy of the foregoing **MOTION OF MILFORD WIND CORRIDOR PHASE I, LLC FOR 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** to:

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/s/ Colette V. Dubois

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