

Gary A. Dodge, #0897
Hatch, James & Dodge
10 West Broadway, Suite 400
Salt Lake City, UT 84101
Telephone: 801-363-6363
Facsimile: 801-363-6666
Email: gdodge@hjdllaw.com

Attorneys for US Magnesium, LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations	Docket No. 10-035-124
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STATEMENT OF US MAGNESIUM LLC REGARDING REVENUE REQUIREMENT SETTLEMENT STIPULATION ISSUES AND WITNESS

In response to the Commission's Order Vacating Certain Revenue Requirement Hearing Dates and Scheduling Hearings on a Proposed Settlement Stipulation issued on July 26, 2011, US Magnesium, LLC (US Mag) submits this Statement of issues it intends to raise and the witness it intends to call at the hearings.

US Mag has not yet been able to determine whether to oppose the Settlement Stipulation because it is not sufficiently specific and does not adequately address some important questions and issues, including those identified below. US Mag intends to offer testimony at the hearing on the following issues relating to the proposed Settlement Stipulation:

1. Whether the Settlement Stipulation provides RMP with sufficient incentive to aggressively pursue maximum value for customers through sales of bundled renewable energy products into high-priced markets such as California. The testimony of Roger J. Swenson filed on behalf of US Mag in this docket identifies tremendous opportunities for sales of bundled renewable energy products, which opportunities will soon be lost unless RMP responds quickly to RFPs and otherwise aggressively markets bundled renewable resources into available high-priced markets. US Mag submits that the Commission should direct RMP to use best efforts to pursue such sales, and also that the Commission should provide RMP with strong financial incentives to do so. The Settlement Stipulation does not appear to provide such incentives.

2. Whether “REC revenues” to be tracked in the REC Balancing Account to be created under Section F (paragraph 61) of the Settlement Stipulation include not only proceeds from the sale of separated or unbundled renewable energy credits (RECs), but also from bundled renewable energy products. Section F of the Settlement Stipulation calls for a REC Balancing Account to track “REC revenues,” but is silent on what is meant by that term. US Mag submits that the balancing account must track not only revenues from the sale of unbundled RECs, but also the value of bundled renewable energy products sold by RMP.

3. Whether the value of bundled renewable energy sales will be properly determined for purpose of the REC Balancing Account. Section F of the Settlement Stipulation is silent on precisely what values will be booked into the REC Balancing Account. US Mag submits that the value of each bundled renewable energy sale should be based on the total revenue received from such sale less the actual cost of displacement energy for the specified period of the sale.

In order to address the issues listed above, US Mag intends to offer the prefiled testimony of Roger J. Swenson in this docket, as well as live testimony of Mr. Swenson on the Settlement Stipulation, including a discussion of the issues identified above.

DATED this 1st day of August, 2011.

/s/ _____
Gary A. Dodge,
Attorney for US Mag

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 1st day of August, 2011, on the following:

Dataraqeust@pacificorp.com

Mark C. Moench
Yvonne R. Hogle
Daniel E. Solander
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111
mark.moench@pacificorp.com
yvonne.hogle@pacificorp.com
daniel.solander@pacificorp.com

Paul J. Hickey
Hickey & Evans, LLP
P.O. Box 467
1800 Carey Avenue, Suite 700
Cheyenne, Wyoming 82003-0467
phickey@hickeyevans.com

Katherine A. McDowell
McDowell & Rackner, P.C.
520 SW 6th Avenue, Suite 830
Portland, OR 97204
Katherine@mcd-law.com

Patricia Schmid
Assistant Attorneys General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov

Paul Proctor
Assistant Attorney General
160 East 300 South, 5th Floor
Salt Lake City, UT 84111
pproctor@utah.gov

F. Robert Reeder
William J. Evans
Vicki M. Baldwin
Parsons Behle & Latimer
One Utah Center, Suite 1800
201 S Main St.
Salt Lake City, UT 84111
BobReeder@pblutah.com
BEvans@pblutah.com
VBaldwin@pblutah.com

Holly Rachel Smith, Esq.
Hitt Business Center
3803 Rectortown Road
Marshall, VA 20115
holly@raysmithlaw.com

Ryan L. Kelly, #9455
Kelly & Bramwell, P.C.
11576 South State St. Bldg. 1002
Draper, UT 84020
ryan@kellybramwell.com

Peter J. Mattheis
Eric J. Lacey
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007
pjm@bbrslaw.com
elacey@bbrslaw.com

Gerald H. Kinghorn
Jeremy R. Cook
Parsons Kinghorn Harris, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
ghk@pkhlawyers.com
jrc@pkhlawyers.com

Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
kboehm@BKLawfirm.com

Sharon M. Bertelsen
Ballard Spahr LLP
One Utah Center, Suite 800
201 South Main Street
Salt Lake City, Utah 84111
bertelsens@ballardspahr.com

Mike Legge
US Magnesium LLC
238 North 2200 West
Salt Lake City, Utah 84106
mlegge@usmagnesium.com

Roger Swenson
US Magnesium LLC
238 North 2200 West
Salt Lake City, UT 84114-6751
roger.swenson@prodigy.net

Stephen J. Baron
J. Kennedy & Associates
570 Colonial Park Drive, Suite 305
Roswell, GA 30075
sbaron@jkenn.com

Captain Shayla L. McNeill
Ms. Karen S. White
AFLOA/JACL-ULFSC
139 Barnes Ave, Suite 1
Tyndall AFB, FL 32403
Shayla.mcneill@tyndall.af.mil
Karen.white@tyndall.af.mil

Sophie Hayes
Sarah Wright
Utah Clean Energy
1014 2nd Avenue
Salt Lake City, UT 84111
sophie@utahcleanenergy.org
sarah@utahcleanenergy.org

Stephen F. Mecham
Callister Nebeker & McCullough
10 East South Temple Suite 900
Salt Lake City, Utah 84133
sfmecham@cnmlaw.com

Rob Dubuc
Western Resource Advocates
150 South 600 East, Suite 2A
Salt Lake City, UT 84102
rdubuc@westernresources.org

Steven S. Michel
Western Resource Advocates
409 E. Palace Ave. Unit 2
Santa Fe, NM 87501
smichel@westernresources.org

Nancy Kelly
Western Resource Advocates
9463 N. Swallow Rd.
Pocatello, ID 83201
nkelly@westernresources.org

Gloria D. Smith
Sierra Club
85 Second Street, Second floor
San Francisco, CA 94105
gloria.smith@sierraclub.org

Bruce Plenk
Law Office of Bruce Plenk
2958 N St Augustine Pl
Tucson, AZ 85712
bplenk@igc.org

Janee Briesemeister
AARP
98 San Jacinto Blvd. Ste. 750
Austin, TX 78701
jbriesemeister@aarp.org

Alex M. Duarte
Qwest Law Department
310 SW Park Avenue, 11th Floor
Portland, OR 97205
Alex.Duarte@qwest.com

Sonya L. Martinez
Salt Lake Community Action Program
764 South 200 West
Salt Lake City, Utah 84101
smartinez@slcap.org

Betsy Wolf
Salt Lake Community Action Program
764 South 200 West
Salt Lake City, Utah 84101
bwolf@slcap.org

Randy N. Parker
Leland Hogan
Utah Farm Bureau Federation
9865 South State Street
Sandy, Utah 84070
rparker@fbfs.com
leland.hogan@fbfs.com

Arthur F. Sandack (Bar No. 2854)
8 East Broadway, Ste 411
Salt Lake City, Utah 84111
801-595-1300 office
asandack@msn.com

/s/ _____