

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

|  |   |
|--|---|
| <b>In the Matter of the Application of Rocky Mountain Power for Approval of Changes to Renewable Avoided Cost Methodology for Qualifying Facilities Projects Larger than Three Megawatts</b> | <b>DOCKET NO. 12-035-100</b><br><b>Sur-rebuttal Testimony of<br/>Ros Rocco Vrba</b> |
|--|---|

Sur-rebuttal Testimony of Ros Rocco Vrba

For Energy of Utah

December 7, 2012

1 **Q. Please state your name, title and business affiliation.**

2 A. My name is Ros Rocco Vrba. I am the principal partner of Energy of Utah, a local wind  
3 power development company.

4 **Q. Have you previously filed testimony regarding this docket?**

5 A. I have. I filed rebuttal testimony on November 29, 2012.

6 **Q. What is the purpose of your testimony?**

7 A. The purpose of my testimony is to respond to one of the recommendations made in the  
8 testimony of Charles Peterson, dated November 30, 2012<sup>1</sup>

---

<sup>1</sup> **DOCKET NO. 12-035-100, In the Matter of the Application of Rocky Mountain Power for Approval of Changes to Renewable Avoided Cost Methodology for Qualifying Facilities Projects Larger than Three Megawatts, Direct Testimony and Exhibits, Charles E. Peterson, November 30, 2012**

9 **Q. To which recommendation do you wish to respond?**

10 A. Mr. Peterson recommends that “a project that cannot demonstrate that it has applied in  
11 the Company’s interconnection agreement process as of October 9, 2012, be made part of the  
12 stay”.<sup>2</sup> Long Ridge Wind’s application for interconnection has been indirectly delayed by the  
13 Company.

14 **Q. Why has Long Ridge Wind not yet applied for interconnection?**

15 A. Our interconnection application should have been made in July of this year, after  
16 receiving indicative pricing. Our original and current development schedules are laid out in the  
17 tables in Exhibit 1.

18 The Company initially delayed the development by three months, violating Schedule 38  
19 indicative pricing procedure. Schedule 38 states: “Within 30 days following receipt of all  
20 information required in Paragraph 2, the Company will provide the owner with an indicative  
21 pricing proposal, which may include other indicative terms and conditions, tailored to the  
22 individual characteristics of the proposed project. *Such proposal may be used by the owner to  
23 make determinations regarding project planning, financing and feasibility.*”<sup>3</sup> Long Ridge Wind’s  
24 indicative pricing was received *three months* after the Schedule 38 deadline. The original project  
25 development table illustrates our expectation that the Company would have adhered to Schedule  
26 38 procedure, and that the interconnection agreement application would have been filed in July  
27 of this year.

28 **Q. Why have you chosen to emphasize the final sentence in the Schedule 38 quotation?**

29 A. Schedule 38 acknowledges the importance of the indicative price as an initial step. It  
30 would not be logical to begin the interconnection application process without an indicative price.

---

<sup>2</sup> DOCKET NO. 12-035-100, Peterson, page 6

<sup>3</sup> ROCKY MOUNTAIN POWER ELECTRIC SERVICE SCHEDULE NO. 38 STATE OF UTAH Qualifying Facility Procedures Filed Oct 9, 2012

31 The interconnection application process is very expensive. Since 2001, Pacificorp has  
32 deactivated 429 interconnection requests.<sup>4</sup> I estimate that these deactivated requests have cost  
33 developers an average of \$60,000 each. Applying for interconnection without a satisfactory  
34 indicated price would be foolhardy.

35 **Q. You finally received indicative pricing from the Company on August 31, 2012. Why**  
36 **did you not immediately file an interconnection application?**

37 A. The price was well below pricing suggested in previous communications with the  
38 Company. We also found, what we believed to be, errors in Long Ridge Wind pricing. The  
39 Division and the Company are both aware of these concerns. The Company's only attempt to  
40 address these concerns has been their request for a stay. We still do not have a correct indicative  
41 price, or even a Company response to our concerns, despite several requests. We are now into  
42 the eighth month of the indicative pricing process, a process that should have taken 30 days.

43 **Q. Mr. Peterson's testimony indicates concern regarding the potential length of time**  
44 **required by a potential interconnection agreement. Do you share his concern?**

45 A. We have already secured and evaluated transmission data, such as interconnection queue  
46 position and Available Transfer Capacity (ATC). We do not anticipate interconnection  
47 difficulties. As you can see in the work flow charts, the most significant factor affecting timing is  
48 usually NEPA, not the interconnection application.

49 **Q. Are you qualified to make such a claim?**

50 A. I have participated in the planning or construction of 26 wind projects.

---

<sup>4</sup> Derived from Pacificorp Generation Interconnection Queue, as of: 7/20/2012

51 **Q. Do you have any further comments?**

52 A. If the suggested interconnection application cut-off date is approved as a condition for  
53 stay consideration, I believe that Long Ridge Wind and Energy of Utah will be materially  
54 harmed by the Company's failure to adhere to Schedule 38 procedures. The retroactive  
55 establishment of this condition makes it particularly unfair. I believe that the condition  
56 selectively discriminates against our project, and will cause the project to fail.

57 **Q. Does that conclude your testimony?**

58 A. Yes.

Submitted Respectfully,

Ros Vrba MBA

For Energy of Utah