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Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of)	
ROCKY MOUNTAIN POWER)	
for Approval of Power Purchase)	DOCKET NO. 13-035-116
Agreement Between PacifiCorp)	
and Latigo Wind, LLC)	RESPONSE OF ROCKY MOUNTAIN
)	TO ELLIS HALL CONSULTANTS, LLC
)	MOTION TO COMPEL

Comes now, Rocky Mountain Power (the “Company”) and provides this response to the Motion to Compel filed with the Public Service Commission of Utah by Ellis Hall Consultants, LLC (“Ellis Hall”) on August 26, 2013. In support of its response, Rocky Mountain Power states as follows.

1. Ellis Hall’s Motion to Compel requested that the Company produce in response to the discovery previously propounded by Ellis Hall the following information:
 - a. LGI application checklists and supporting documentation;
 - b. LGI system impact checklists and supporting documentation;
 - c. Facilities study checklists and supporting documentation;
 - d. Documents and communications referring to transmission services, including but not limited to Blue Mountain’s and Latigo’s queue positions during 2012 and 2013;

- e. QF Applications and supporting documentation;
- f. LGIA Applications and supporting documentation;
- g. Documents and communications between PacifiCorp transmission services (large generation interconnection and transmission service) involving PacifiCorp merchants in the Blue Mountain and Latigo projects, and between PacifiCorp transmission services and PacifiCorp merchants.

2. Rocky Mountain Power is compiling the information requested and will provide it to counsel for Ellis Hall, with the exception of the LGIA between PacifiCorp and Blue Mountain Power Partners, LLC, which is confidential pursuant to its terms until it is executed, and the documents responsive to (e) above, which have already been provided to counsel in Rocky Mountain Power's initial response.

3. Rocky Mountain Power discussed the responses that are being prepared with counsel for Ellis Hall, and the parties believe this matter will be resolved, pending review of the responses by Ellis Hall, without the need for a hearing on the Motion to Compel.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission dismiss the Motion to Compel after Ellis Hall confirms that is has received the documents responsive to the Motion to Compel.

DATED this 5th day of September 2013.

Respectfully submitted,

Daniel E. Solander
Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September 2013, a true and correct copy of the forgoing was served on the following by electronic mail:

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