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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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<b>IN THE MATTER OF SCHEDULE 37 AVOIDED COST PURCHASES FROM QFS</b>	<b>Docket No. 13-035-T09  REPLY COMMENTS OF SUNEDISON, LLC</b>
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SunEdison LLC (“SunEdison”) hereby submits these Reply Comments to the Comments of the Division of Public Utilities (“DPU”) and Rocky Mountain Power (“RMP”) filed in this docket.

SunEdison strongly disagrees with the recommendations of the DPU and RMP to revise Schedule 37 pricing at this time. The proposed changes are premature and unsupported. SunEdison respectfully submits that:

1. No changes to Schedule 37 pricing for solar QF are warranted at this time; inadequate solar data is available for evaluation.

2. Some of the issues, data and methodologies relevant to Schedule 37 pricing are also relevant to and involved in the Schedule 38 pricing docket, Docket No. 12-035-100, which is still under consideration. Schedule 37 prices and methodologies should not be changed while the Schedule 38 issues are still in dispute. RMP's initial Advice Filing in this docket acknowledges the overlap and interrelationship between the two dockets. Although RMP has not yet proposed to change the peak contribution assumption used in the existing Schedule 37 tariff pricing, there is no evidence in this docket that those assumed peak contributions are still correct; indeed the Schedule 38 docket demonstrates that they are not. SunEdison submits that new Schedule 37 pricing should not be approved until these overlapping and inter-dependent issues can be fully and fairly evaluated and resolved.
3. SunEdison submits that no changes to Schedule 37 pricing should be approved before SunEdison and other interested parties have had a full and fair opportunity for discovery and testimony on all issues relevant to revised Schedule 37 pricing.

DATED this 27<sup>th</sup> day of June, 2013.

HATCH, JAMES & DODGE

/s/ \_\_\_\_\_  
Gary A. Dodge  
Attorneys for SunEdison, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 27<sup>th</sup> day of June, 2013, on the following:

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