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Attorneys for eBay Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's
Proposed Electric Service Schedule No. 32,
Service from Renewable Energy Facilities

DOCKET NO. 14-035-T02

EBAY'S COMMENTS ON NEED FOR
SECOND TECHNICAL CONFERENCE

eBay Inc. ("eBay"), by and through its attorney, files the following comments in the above-referenced docket pursuant to the Public Service of Commission of Utah's ("Commission") Request for Comments dated July 31, 2014.

eBay believes that a second technical conference in this docket is needed so that Rocky Mountain Power ("RMP") can address the following issues, topics and questions:

1. A renewable energy project may be sited in relatively close proximity to the RMP customer's electricity consumption. Therefore, postage stamp transmission and distribution charges and average line losses from the proposed tariff would overstate the costs to RMP. Could the proposed tariff allow for negotiation of those rate factors in the individual contract between RMP and its customer?

2. RMP's cost of service recovery concept for the proposed tariff is tied to its peak demand charges. What actions, if any, is RMP considering to avoid rate increases in this proposed tariff in future years? Could rate increases meaningfully exceed average overall rate increases for customers' traditional electricity service from the utility? The concern is that RMP may move increasingly to peak demand based rates and, thereby, increase the relative costs of service under this proposed tariff. Both renewable developers/owners and end-users must make long-term (often 15 to 25 year) decisions for a renewable investment in Utah, and uncertainty around the movement of this proposed tariff relative to other RMP rates could add to project risk.

3. When does RMP expect to share its full, boilerplate contracts that it proposes to use with the renewable energy project owner and its customer to implement this tariff?

DATED at Salt Lake City, Utah, this 5th day of August, 2014.

Callister Nebeker & McCullough

/s/

Brian W. Burnett
Attorneys for eBay Inc.

CERTIFICATE OF SERVICE

I CERTIFY that on the 5th day of August, 2014, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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