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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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<b>In the Matter of Rocky Mountain Power's Proposed Revisions to Electric Service Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities</b>	<b>Docket No. 14-035-T04</b>  <b>SUNEDISON, LLC'S COMMENTS, REQUEST FOR SUSPENSION, AND REQUEST FOR SCHEDULING CONFERENCE</b>
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In response to the Commission's Notice of Filing and Comment Period issued in this docket on May 12, 2014, SunEdison LLC ("SunEdison") submits these Comments, Request for Suspension, and Request for Scheduling Conference.

Unlike typical annual updates of Schedule 37 prices filed by Rocky Mountain Power ("RMP") in the past, this filing proposes several sweeping changes to the structure and pricing of Schedule 37. SunEdison submits that careful evaluation and analysis of all of the proposed changes is warranted. SunEdison therefore respectfully requests that the Commission suspend

the proposed tariff and set up a scheduling conference to establish a schedule for a technical conference, discovery, substantive comments or testimony and a hearing.

Among the reasons SunEdison is requesting further analysis of RMP's proposed revisions to Schedule 37 are the following:

1. RMP is proposing to eliminate the long-standing option for a Qualifying Facility ("OF") to elect capacity and average energy pricing. This is a substantive change that requires further explanation and analysis.

2. RMP has utilized a number of significant methodological and calculation changes that it claims are consistent with Commission orders in the Schedule 38 Docket, 12-035-100, and the 2013 IRP. The extent to which each such methodological or calculation change should properly be applied to Schedule 37, and the extent to which each such change has been properly implemented, have not been adequately explained, and further analysis is necessary.

3. RMP proposes to eliminate access to published pricing for a QF that requires any transmission upgrades, offering instead to provide upon request prices that "reflect the appropriate transmission constraint." This exclusion appears inconsistent with the intent of Schedule 37 to provide easy access to published prices for small QF projects. Moreover, the filing provides no explanation as to what types of transmission upgrades may trigger this exclusion, or how transmission constraints will be taken into account in calculating prices. This issue also requires further explanation and analysis.

4. RMP filed three appendices with its Application, one of which contains studies and models relied upon by RMP in calculating rates. SunEdison and other affected parties need access to these models and studies in order to better understand them and their results.

Given the significant and unusual methodological, calculation and other changes proposed for Schedule 37 by RMP, SunEdison submits that further explanations and evaluations are necessary for the significant changes proposed by RMP. SunEdison respectfully requests that the proposed tariff be suspended and that a scheduling conference be scheduled to establish discovery turn-around times and dates for a technical conference, substantive comments/testimony, and a hearing, if needed or appropriate.

DATED this 22<sup>nd</sup> day of May, 2014.

HATCH, JAMES & DODGE

/s/ \_\_\_\_\_  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 22<sup>nd</sup> day of May, 2014, on the following:

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