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Granite Mountain West Solar, LLC

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Iron Springs Solar, LLC

**Docket No. 15-035-41**

In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Granite Mountain Solar East, LLC

**Docket No. 15-035-42**

In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Granite Mountain Solar West, LLC

**Docket No. 15-035-43**

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**REPLY COMMENTS OF IRON SPRINGS SOLAR, LLC, GRANITE MOUNTAIN SOLAR EAST, LLC AND GRANITE MOUNTAIN SOLAR WEST, LLC IN SUPPORT OF APPROVAL OF APPLICATIONS**

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Pursuant to the Scheduling Order in these dockets, Iron Springs Solar, LLC, Granite Mountain Solar East, LLC and Granite Mountain Solar West, LLC (collectively, the “Developers”), the Sellers under the Power Purchase Agreements (“PPAs”) filed for approval, provide the following comments in reply to the comments filed by the Division of Public Utilities (“Division”) and the Office of Consumer Services (“Office”) in these dockets.

The Developers appreciate the Comments filed by the Division supporting Commission approval of the PPAs. The Developers agree with the Division that the PPAs are compliant with Schedule 38 and other applicable Commission regulations and orders. The Developers appreciate the Division’s careful review of the pricing provisions and its discovery of corrections that increase the calculated purchase prices slightly. While the increased prices would have been welcomed, the Developers agree with the Division that they are inconsequential. The Developers also confirm the Division’s understanding that interconnection agreements have been executed with respect to each of these three projects.

The Developers also appreciate the review and comments of the Office, its conclusion that the PPAs appear compliant with applicable schedules and orders, and its non-opposition to approval of the PPAs. The Developers will briefly respond to the comments and concerns expressed in the Office’s comments.

The Office raised concern over “one-off special pricing arrangements” (at 2). In fact, the pricing contained in these PPAs were developed using Commission-approved models, tariffs and procedures, and do not reflect “one-off” or “special pricing” arrangements. The applicable Schedule 38 does not include guidance or requirements for re-pricing at any particular point in time. Certain minor disputes arose during the PPA negotiation process regarding an earlier request

by the Developers for re-pricing, delays in the negotiation process, and a subsequent re-pricing suggestion of Rocky Mountain Power. The parties resolved these minor disputes by agreeing that the projects would not be re-priced, either as of the earlier date requested by the Developers or the later date suggested by Rocky Mountain Power. In addition, the Developers agreed to transfer RECs to Rocky Mountain Power for half of the terms of the PPAs. The prices contained in the PPAs thus resulted from compliance with Commission-approved modeling and procedures, and were later left as calculated in settlement of subsequent minor disputes. Developers agree with the Office, however, that the revised Schedule 38 procedures recently approved by the Commission will improve the Schedule 38 process and make re-pricing issues and disputes less likely.

The Office also raised questions about FERC's one-mile separation requirement and the appearance of "gaming the system." The Developers have not attempted to game the system in any respect. As illustrated in the map attached hereto as Exhibit A, each of the three projects is separated from the other two projects by more than a mile. Similarly, the Office questions the combined System Impact Study for Granite Mountain Solar East and Granite Mountain Solar West. The System Impact Study was combined for these two projects because they share an interconnection point. The collective interconnection impacts would have been the same whether the projects were studied independently or together. Thus, there was no legitimate reason to request two separate studies with redundant and unnecessary costs.

Finally, the Developers appreciate Rocky Mountain Power's efforts with respect to these PPAs. The Developers respectfully submit that the Applications of Rocky Mountain Power, the Comments and support of the Division, the Comments and non-opposition of the Office and these Reply Comments demonstrate that the PPAs are compliant with all applicable tariffs and orders

and are in the public interest. The Developers respectfully request a bench order following the hearing approving these PPAs, and a written approval order on or about July 17, 2015, so that they can continue their efforts to develop these significant new investments in the State Utah.

Dated this 12<sup>th</sup> day of June 2015

HATCH, JAMES & DODGE

/s/ \_\_\_\_\_

Gary A. Dodge

Attorneys for Iron Springs Solar, LLC;  
Granite Mountain East Solar, LLC and  
Granite Mountain West Solar, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 12<sup>th</sup> day of June 2015 on the following:

Division of Public Utilities:

Data Request	dpudatarequest@utah.gov
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/s/ Lauren Mckan