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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Modification of Contract Term of PURPA Power Purchase Agreements with Qualifying Facilities	Docket No. 15-035-53
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PREFILED DIRECT TESTIMONY AND EXHIBITS OF BRYAN L. HARRIS

The Rocky Mountain Coalition for Renewable Energy hereby submits the Prefiled Direct Testimony of Bryan L. Harris in this docket.

DATED this 16th day of September 2015.

HATCH, JAMES & DODGE

/s/ _____
Gary A. Dodge
Attorneys for the Coalition

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 16th day of September 2015 on the following:

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Direct Testimony of Bryan L. Harris

On Behalf of the

Rocky Mountain Coalition for Renewable Energy

September 16, 2015

1 **Q. Please state your name and business address.**

2 A. My name is Bryan L. Harris. My business address is 285 North 100 West, Beaver,
3 UT 84713.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am a Senior Development Manager for SunEdison. SunEdison and its affiliates
6 develop, own and operate renewable energy projects around the world including
7 the following projects in Utah: 2 operating wind projects totaling 306 MW, 5
8 operating solar projects totaling 17MW, 17 under construction solar projects
9 totaling 726 MW. SunEdison has additional renewable energy projects under
10 development in Utah.

11 **Q. On whose behalf are you testifying in this proceeding?**

12 A. I am testifying on behalf of the Rocky Mountain Coalition for Renewable Energy
13 (“Coalition”), an informal coalition formed for the limited purpose of opposing the
14 efforts of Rocky Mountain Power Company (“RMP”) in Utah and Wyoming to
15 limit the maximum term of Qualifying Facility (“QF”) power purchase agreements
16 (“PPAs”) to three years. Among the current supporters of the Coalition are the Utah
17 Association of Energy Users (“UAE”), EverPower Wind Holdings Inc., Scatec
18 Solar North America, Inc., SunEdison, Sustainable Power Group (“sPower”) and
19 Wasatch Wind.

20 **Q. Please provide a brief summary of your background and experience.**

21 A. I have a BS in Environmental Science and an MBA, both from Utah State
22 University. I have worked as a Senior Development Manager for SunEdison since

23 January of 2015. Prior to SunEdison, I spent 5 years as a Development Manager
24 for First Wind developing wind and solar projects in Utah and other western states.

25 **Q. Do you have any experience with renewable energy development in Utah or**
26 **Wyoming?**

27 A. Yes. I have been developing renewable projects in Utah for 6 years. I successfully
28 developed the operating 102 MW Milford Wind Corridor Phase II project located
29 north of Milford, UT in 2011. I also successfully developed 14 QF solar projects
30 in Utah, four of which are now operating and 10 are under construction. These
31 projects range in size from 2MW to 80MW and are all located in Beaver and Iron
32 Counties.

33 **Q. Why does the Coalition oppose RMP's efforts to limit QF PPAs to three years?**

34 A. We believe that limiting the maximum term of QF PPAs to three years in Utah
35 and Wyoming would adversely affect the ability of renewable energy developers
36 to finance QF projects, which would frustrate future development of cost-
37 effective renewable resources. We believe such a result would not be consistent
38 with the goals of federal and state laws designed to encourage cogeneration and
39 renewable energy development, would be anti-competitive, and would be
40 inconsistent with the public interest.

41 **Q. Why would a three-year PPA term affect the ability of developers to finance**
42 **QF projects?**

43 A. In nearly all cases of which I am aware, project financing of QF projects has
44 involved PPAs with much longer terms, typically twenty years. In determining

45 whether to make debt (or equity) investments in QF projects, companies typically
46 consider the financial strength of the counterparty (i.e., the purchasing utility), the
47 purchase price, the length or term of the PPA, and other important PPA terms and
48 conditions. In my opinion and experience, a three-year PPA term would almost
49 certainly prevent project financing for almost any new renewable energy project.
50 Almost any term length of less than twenty years would make project financing of
51 renewable energy projects very difficult.

52 **Q. Why would frustration of QF development have anti-competitive effects?**

53 A. If third-party developers cannot secure project financing for renewable energy
54 projects, presumably only the utility will be able to finance such projects.

55 **Q. Would that result be consistent with the goals of laws designed to encourage
56 development of cogeneration and renewable energy?**

57 A. No, it would be inconsistent with those goals as I understand them. I believe sound
58 public policy is to encourage third-party development of clean energy projects at
59 reasonable prices.

60 **Q. Should ratepayers of regulated utilities subsidize companies who develop QF
61 projects?**

62 A. No, that is not our goal. Assuming avoided costs are reasonably projected based
63 on defensible assumptions, neither ratepayers nor QF developers should pay or
64 receive any subsidies.

65 **Q. Does this conclude your direct testimony?**

66 A. Yes, it does.