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V.P. Regulation
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December 9, 2016

VIA HAND DELIVERY

Public Service Commission of Utah
400 Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84111

Re: Docket No. 16-035-T14 – Advice No. 16-13

Dear Commissioners:

As you know, Rocky Mountain Power (the “Company”) has received and responded to numerous comments from intervenors and other interested parties regarding its Advice No. 16-13 letter, filed on November 9, 2016 (the “Tariff Filing”), seeking to close Schedule 135 to new service and to implement Schedule 135A pending the outcome of Docket No. 14-035-114. As indicated in the Company’s Reply Comments, most objections are based on an incorrect understanding of the applicability and implementation of Schedule 135A.

Nevertheless, the Company continues to be willing to work with interested stakeholders to address issues that have been raised about the net metering program. Over the course of the past week, the Company has been involved in preliminary discussions with stakeholders to engage in further dialogue and explore mutually-acceptable resolutions. Unfortunately, the intervenors themselves have disparate views about the process to be used for such discussions that require additional effort and time to resolve. Therefore, parties have not been able to reach agreement prior to December 10, 2016, the proposed effective date for the tariff changes.

Based on the current status of the meetings and in an effort to foster further discussion, the Company recommends the Commission exercise its statutory prerogative to suspend the Tariff Filing pursuant to Utah Code Ann. § 54-7-12(5) & (6) while interested stakeholders continue to seek mutually acceptable resolutions. The Company will notify the Commission if a stipulation is reached or if the attempt to resolve this matter becomes unfruitful.

The Company recognizes that the Commission must act in the best interests of Utah customers and is not required to suspend the Tariff Filing. If the Commission allows the Tariff Filing to go into effect, the Company also recommends that the order clarify the prevalent

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misunderstandings about the impact of the Tariff Filing.

Sincerely,

/s/ Jeffrey K. Larsen

Jeffrey K. Larsen
Vice President, Regulation
Rocky Mountain Power

cc: All Parties via Docket Filing