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November 7, 2017

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: **Docket No. 17-035-23** – In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for Wind Resources

Rocky Mountain Power hereby submits for electronic filing its Response in Opposition to Utah Association of Energy Users' Petition for Reconsideration and Rehearing in the matter referenced above.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

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Sincerely,

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| <p>In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for Wind Resources</p> | <p>Docket No. 17-035-23</p> <p>ROCKY MOUNTAIN POWER'S RESPONSE IN OPPOSITION TO UTAH ASSOCIATION OF ENERGY USERS' PETITION FOR RECONSIDERATION AND REHEARING</p> |
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I. INTRODUCTION AND SUMMARY

On October 23, 2017, the Utah Association of Energy Users (“UAE”) filed a petition for reconsideration and rehearing of the Order of the Public Service Commission of Utah (“Commission”), dated September 22, 2017 (“Order”), approving PacifiCorp’s d/b/a Rocky Mountain Power (“the Company”) request for proposals for new wind resources (“2017R RFP”). UAE argues that the Commission: (1) did not—and could not—find that the 2017R RFP is in the public interest; (2) failed to adequately consider and make findings on statutory factors and rules; (3) effectively precluded future review of any resources identified by the 2017R RFP; and (4)

failed to hold the Company to its burden of proof.¹ UAE requests that the Commission “modify its Order to require RMP to include solar resources in its RFP in order to secure a robust set of competing bids.”²

The Commission should deny UAE’s petition. UAE fails to identify any new facts warranting reconsideration of the Order, and ignores new facts that render its petition moot. In response to the Order, the Company announced that it would issue a solar RFP and run it concurrently with the 2017R RFP, allowing a head-to-head comparison of wind and solar resources. This separate-but-concurrent approach permits the Company to “solicit and evaluate solar and wind bids on a fair and comparable basis,” as UAE requests in its petition. In fact, UAE suggested such an approach at the hearing.

The Order complies with the requirements of the Energy Resource Procurement Act (“Act”) and the Commission’s rules implementing the Act. The Commission expressly relied on the Independent Evaluator’s (“IE”) findings that the 2017R RFP meets the requirements of the Act and is in the public interest. The Order incorporates the IE’s report and testimony, which address each of the statutory and regulatory requirements. As the Commission noted, it is the statutory responsibility of the IE to render an opinion to the Commission on whether the RFP is in the public interest. The Commission’s reliance on the IE’s findings is exactly what is envisioned by statute. The fact that the Commission did not expressly reiterate the IE’s findings in its Order is not dispositive because, under Utah law, it is sufficient for the Commission to implicitly make the necessary findings by relying on the IE’s findings and incorporating them in the Order.

¹ Petition of Utah Association of Energy Users for Reconsideration and Rehearing of Commission Order Issued September 22, 2017 at 2, 5, 7, 9, 11 (Oct. 23, 2017) (“UAE Petition”).

² UAE Petition at 12.

The Commission also properly considered whether the 2017R RFP would “most likely result in the acquisition, production, and delivery of electricity at the lowest reasonable cost to the retail customers” (*i.e.*, the low-cost factor). Indeed, the Commission amended the procedural schedule expressly to ensure that it had a full record for its review of the low-cost factor. UAE cannot credibly claim that the Commission did not consider this factor when the Commission set a hearing specifically to address it.

II. DISCUSSION

A. The Company’s solar RFP fully addresses UAE’s requested relief.

UAE’s petition seeks inclusion of solar resources in the 2017R RFP,³ without ever acknowledging that, on October 10, 2017, the Company filed a notice that it is “preparing to issue a separate solicitation for solar resources, the 2017S RFP[.]”⁴ As explained in the Company’s notice, this new solar RFP was intended to “address the concerns raised by the Commission in the Order, as well as the concerns in the Statement of Commissioner David R. Clark[.]”⁵

The 2017S RFP will use a schedule “that will allow the Company to: 1) evaluate how solar resource bids might impact the economic analysis of bids selected to the final shortlist in the 2017R RFP without delaying the schedule for the 2017R RFP or for the decision in Docket No. 17-035-40, and 2) proceed with procuring solar resource opportunities that could provide all-in economic benefits for customers.”⁶ The Company’s “supplemental testimony on January 16, 2018, in Docket No. 17-035-40 will include a quantification of how solar resource bids received through the 2017S

³ UAE Petition at 12.

⁴ Rocky Mountain Power’s 2017R RFP Update at 1 (Oct. 10, 2017).

⁵ Rocky Mountain Power’s 2017R RFP Update at 1.

⁶ Rocky Mountain Power’s 2017R RFP Update at 1.

RFP might impact the economic analysis of bids selected to the final shortlist through the 2017R RFP.”⁷ This will provide “an opportunity to review comparisons between wind and solar resource bids even though the wind and solar RFP’s are separate.”⁸ Together the 2017R and 2017S RFPs satisfy UAE’s request for a “meaningful and adequate method of determining whether any resulting resource decisions should be approved as consistent with the Act.”⁹

The Company’s approach to the 2017S RFP aligns with the position UAE appeared to advocate at hearing. For example, in cross-examination, UAE’s counsel asked whether UAE’s and the IE’s “objectives might be achieved if the [C]ommission were to require the utility to literally pursue both RFPs simultaneously,”¹⁰ with the Company using the results of each RFP to evaluate the results of the other.¹¹

Instead of criticizing the actual 2017R and 2017S solicitation processes, UAE argues against a strawman, claiming that a separate solar RFP “would not accomplish the objective of

⁷ Rocky Mountain Power’s 2017R RFP Update at 1.

⁸ Rocky Mountain Power’s 2017R RFP Update at 1-2.

⁹ UAE Petition at 7.

¹⁰ Hearing Transcript at 209, lines 18-22. The hearing transcript contains several instances where counsel for UAE suggested in his questions that a concurrent wind and solar RFP process would address UAE’s concerns over the lack of a single RFP covering both resources. For example, when the IE suggested that a subsequent solar RFP might allow the Company to take certain procedural off-ramps (should it become clear that wind resources are less economic than solar options) UAE’s counsel responded: “There’s off-ramps, but you won’t know what the solar numbers are in time to take those off-ramps. . . . Are you telling me we’ll have another RFP with solar in time to stop that process if it’s less expensive and [compare them] head-to-head? If you’re telling me that, then I may have a different view of what your recommendation[] [is]. I might [accept it].” Hearing Transcript at 189, lines 5-10 (brackets provided to conform to audio, *Solicitation for Wind Resource 17-035-23*, at 5:09:30, available at <https://www.youtube.com/watch?v=yARIYlmyeA>). When the IE responded that “the best thing to do would be to go out with a separate RFP followed closely by a [solar] RFP,” hearing transcript at 210, lines 3-5, UAE’s counsel continued: “Well, and [maybe I wasn’t clear,] *that’s what I was trying to suggest*, that immediately following the issuance of the wind RFP, the company be directed within so many weeks [to issue a] solar RFP or an all-renewable RFP [that solicited] other types of resources but then condition approval of one on the ability to evaluate the other so that we really do collect a pool of resources.” Hearing Transcript at 210, lines 6-13 (brackets provided to conform to audio, *Solicitation for Wind Resource 17-035-23*, at 5:37:19, available at <https://www.youtube.com/watch?v=yARIYlmyeA>) (emphasis added).

¹¹ Hearing Transcript at 189.

comparing the proposed solar resources against the wind resources on an equal basis” because a separate solar RFP would be issued after the conclusion of the 2017R RFP.¹² This criticism does not account for the concurrent schedule the Company has proposed.

UAE’s petition to revise the Order to require the Company “to solicit and evaluate” comparable solar resources proposes to mandate the course to which the Company has already committed, and is unnecessary.¹³

B. The Commission considered the necessary factors and made the necessary findings in approving the 2017R RFP.

1. The Commission properly found that the solicitation is in the public interest.

UAE claims that the Commission failed to conclude “that the solicitation process is . . . in the public interest—a fatal flaw.”¹⁴ But the Commission plainly determined that the Company’s solicitation is in the public interest by finding that the solicitation “complies with the Act and with our rules.”¹⁵

In order to approve a solicitation proposal, the Commission must determine whether the solicitation process:

- (i) complies with this chapter and rules made in accordance with Title 63G, Chapter 3, Utah Administrative Rulemaking Act; and
- (ii) *is in the public interest* taking into consideration:
 - (A) whether it will most likely result in the acquisition, production, and delivery of electricity at the lowest reasonable cost to the retail customers of an affected electrical utility located in this state;
 - (B) long-term and short-term impacts;

¹² UAE Petition at 7 (quoting Order at 9).

¹³ UAE Petition at 9.

¹⁴ UAE Petition at 3.

¹⁵ Order Approving RFP with Suggested Modification at 7 (Sept. 22, 2017) (“Order”).

- (C) risk;
- (D) reliability;
- (E) financial impacts on the affected electrical utility; and
- (F) other factors determined by the commission to be relevant.¹⁶

This framework requires that a solicitation be in the public interest, while laying out a number of factors that may influence the Commission’s public interest determination. The Commission may make its findings either explicitly or implicitly.¹⁷ “A finding may be implied if it is clear from the record, and therefore apparent upon review, that the finding was actually made as part of the tribunal’s decision.”¹⁸ Findings and decisions are sufficient if they allow for meaningful review.¹⁹

In its Order, the Commission explained that the Act requires the solicitation to be “in the public interest.”²⁰ The Commission also prefaced its discussion of the RFP by asking “[w]hether the [s]olicitation [p]rocess is in the [p]ublic [i]nterest.”²¹ By stating that the Act requires the solicitation to be in the public interest, considering factors relevant to the public interest, and then concluding that the “solicitation process complies with the Act and with our rules,”²² the Commission made the requisite public interest determination.

The Commission’s public interest determination also relies explicitly on the findings of the IE that the 2017R RFP satisfies the requirements of the Act and is in the public interest.²³ The Commission’s adoption of the IE’s findings comports with the structure of the Act, which

¹⁶ Utah Code Ann. § 54-17-201(2)(c)(ii) (emphasis added).

¹⁷ *Davis v. Dep’t of Workforce Servs.*, 280 P.3d 442, 444 (Ut. App. 2012) (describing the standard for challenging an agency finding of fact “made or implied by the agency”).

¹⁸ *Adams v. Board of Review of Indus. Comm’n*, 821 P.2d 1, 5 (Ut. App. 1991).

¹⁹ *Comm. Carriers v. Indus. Comm’n*, 888 P.2d 707, 711 (Ut. App. 1994).

²⁰ Order at 5.

²¹ Order at 7.

²² Order at 6-7.

²³ Order at 6.

establishes the IE as advisor to the Commission.²⁴ The IE is tasked with reviewing the legality of the proposed RFP, providing “one or more reports” to the Commission, and rendering an opinion as to the RFP’s legal compliance.²⁵ Thus, the statute envisions Commission reliance on the IE’s report for a public interest determination, as embodied in the Order.²⁶

UAE argues that the Commission failed to make any public interest determination because the Order never uses the exact words UAE believes are necessary.²⁷ UAE relies on the Utah Supreme Court’s decision in *Utah Dep’t of Bus. Reg., Div. of Pub. Utils. v. Pub. Serv. Comm’n*, 614 P.2d 1242 (Utah 1980).²⁸ In that case, the Commission approved new rates, but did not address whether rates overall were just and reasonable.²⁹ While the court reversed and held that the Commission must fully consider the overall issue presented, it did not find that the Commission must use particular words in reaching a determination, nor did it reject the well-established principle that findings may be made either explicitly or implicitly.³⁰ Because the Commission fully considered whether the 2017R RFP is in the public interest, the case does not support UAE’s petition.

²⁴ Utah Code Ann. § 54-17-203.

²⁵ Utah Code Ann. § 54-17-203(3)(b).

²⁶ IE Exhibit 1.0 REB, lines 258-65 (“[T]he IE believes that there are several ‘off-ramps’ which are inherently included in the solicitation process and schedule that can lead either to termination of the solicitation by PacifiCorp or an opinion by the Commission, IE, or other parties to suggest the solicitation process not continue if it appears that the public interest standard will not be met.”).

²⁷ UAE Petition at 2-3

²⁸ UAE Petition at 3.

²⁹ *Business Reg.*, 614 P.2d at 1244.

³⁰ *Id.* at 1247 (“The meager evidence adduced is insufficient to sustain the findings of the [Commission], i.e., there is no justification in the evidence of the facts found.”).

2. The Commission considered all necessary factors, as evidenced by its adoption of the IE’s findings.

UAE further claims that the Commission failed to consider and make findings on factors enumerated in the Act and in the Commission’s rules.³¹ Whether an agency considered a particular issue is not determined solely by the final order itself; one must look to the entirety of the record to perceive the scope of an agency’s consideration.³² Here, the record reveals the Commission’s detailed consideration of specific statutory factors, including cost, long-term and short-term impacts, risk, reliability, and financial impacts on the utility.³³ At the hearing, Commissioners asked questions concerning possible impacts of the RFP approval,³⁴ comparative solar prices,³⁵ risks relating to expanding the RFP to include solar,³⁶ the risk of forfeiting PTC credits,³⁷ and transmission constraints.³⁸ The Order expressly addresses the price of solar,³⁹ the benefits of comparing solar and wind bids,⁴⁰ the “tax implications” of approving or rejecting the RFP,⁴¹ and

³¹ UAE Petition at 3-4. Utah Admin. Code R746-420-3(1)(b), as highlighted by UAE, requires that utilities’ proposals: (iv) Be designed to solicit a robust set of bids to the extent practicable; and (v) Be commenced sufficiently in advance of the time of the projected resource need to permit and facilitate compliance with the Act and the Commission rules and a reasonable evaluation of resource options that can be available to fill the projected need and that will satisfy the criteria contained within Section 54-17-302(3)(c). The utility may request an expedited review of the proposed Solicitation and Solicitation Process if changed circumstances or new information require a different acquisition timeline. The Soliciting Utility must demonstrate to the Commission that the timing of the Solicitation Process will nevertheless satisfy the criteria established in the Act and in Commission rules.

³² *Lake Shore Motor Coach Lines v. Welling*, 339 P.2d 1011, 1014 (Utah 1959) (“[I]t is not upon any particular portion of the Commission’s report and order that an analysis of its action should rest, but upon its entirety and its relation to the record upon which it is based.”); see also *Hutchings v. Labor Comm’n*, 378 P.3d 1273, 1282 (Ut. App. 2016) (looking to the record in concluding that the agency considered all necessary evidence).

³³ Utah Code Ann. § 54-17-201(2)(c)(ii)(A)-(F).

³⁴ Docket No. 17-035-23, Hearing Transcript at 33 (Sept. 19, 2017) (“Hearing Transcript”).

³⁵ Hearing Transcript at 151.

³⁶ Hearing Transcript at 138-39.

³⁷ Hearing Transcript at 139-140.

³⁸ Hearing Transcript at 146.

³⁹ Order at 8.

⁴⁰ Order at 9.

⁴¹ Order at 10.

the risk of production tax credit (“PTC”) forfeiture.⁴² The Commission reviewed a wide range of costs and risks before reaching its public interest determination.

The IE’s findings also discussed each of the statutory factors.⁴³ For example, the IE noted that PacifiCorp’s integrated resource plan will only consider projects that do not compromise system reliability.⁴⁴ The report thoroughly considered risk, noting that the integration of wind resources and the new transmission “could pose risks to bidders and consumers if the transmission project is not built on time to allow bidders or benchmark resources to achieve” PTC benefits.⁴⁵ And the IE extensively considered cost.⁴⁶ Taken together, these cost implications, potential risks, and reliability concerns were themselves relevant to possible long- and short-term impacts, as well as to potential financial impacts on the Company.⁴⁷ The substance of all statutory factors was fully addressed and adopted by the Commission.⁴⁸ In addition, the Commission explicitly found that the 2017R RFP complies with the Commission’s rules.⁴⁹

UAE argues that the Commission never found that the solicitation process would “most likely result in the acquisition, production, and delivery of electricity at the lowest reasonable cost to the retail customers.”⁵⁰ UAE further claims that, because the 2017R RFP does not include solar resources, the solicitation process cannot meet this factor.⁵¹

⁴² Order at 10.

⁴³ Report of the Utah Independent Evaluator Regarding PacifiCorp’s Draft Renewable Request for Proposals (2017R RFP) at 16-19 (Aug. 11, 2017) (“IE Report”).

⁴⁴ IE Report at 16.

⁴⁵ IE Report at 3.

⁴⁶ IE Report at 3.

⁴⁷ Utah Code Ann. § 54-17-201(2)(c)(ii)(B).

⁴⁸ Order at 6.

⁴⁹ Order at 7.

⁵⁰ UAE Petition at 6-7.

⁵¹ UAE Petition at 7.

The Commission established additional procedures in this case to specifically address the low-cost factor, including an additional round of testimony and a public hearing to ensure that it had a full and adequate record for its decision.⁵² Moreover, the IE’s report and testimony, which the Commission explicitly relied on, never found that the 2017R RFP must be expanded to include solar bids in order to satisfy the requirements of the Act.⁵³ Instead, the IE recommended against expanding the RFP because doing so risked a delay that could result in customers losing the benefits of production tax credits.⁵⁴

Further, contrary to UAE’s assertion, the Act does not require the Commission to reach a low-cost determination as a prerequisite for approving a solicitation. Instead, the Act provides that the solicitation must be “in the public interest,” before enumerating a number of factors that the Commission must take “into consideration,” such as costs, risks, impacts, etc.⁵⁵ None of the statute’s enumerated factors are singled out as determinative. Indeed, it is entirely possible—if not likely—that certain factors will be countervailing, requiring the Commission to balance each factor in arriving at the public interest finding. For instance, the Commission specifically acknowledged possible risks associated with delaying the solicitation process, and cited these risks when choosing to suggest, rather than require, modification to the 2017R RFP.⁵⁶ Thus, where UAE complains

⁵² Order and Notice of Scheduling Conference (Aug. 22, 2017).

⁵³ IE Report, *supra* n. 43.

⁵⁴ *See e.g.*, Hearing Transcript at 162 (“If the RFP is further delayed and the process takes longer than currently planned, it may be a real challenge to complete the solicitation process with adequate time to take full advantage of the PTC benefits”); *id.* at 186 (“Expand[ing] to solar . . . [adds] more risk [that] the transmission line wouldn’t be completed”); *id.* at 187 (“But . . . on the other hand, if by . . . [expanding] the RFP to solar, [if] it does cause . . . the wind projects not to be able to get built . . . to take advantage of the PTCs, there’s a big loss of benefit there as well. [You’ve got] to look at it from both sides.”).

⁵⁵ Utah Code Ann. § 54-17-201(2)(c)(ii).

⁵⁶ Order at 10.

that the Commission “does not find that, or explain how, this critical [low-cost factor] has been satisfied,” UAE mistakenly transforms a balancing factor into a threshold test.⁵⁷

C. The Commission can meaningfully review the resource selection resulting from the 2017R RFP.

UAE argues that the Commission’s approval of the 2017R RFP will not permit subsequent meaningful review of the selected resource if the solicitation process excludes solar resources.⁵⁸ Because the Commission must consider the same factors when approving an RFP and when approving a selected resource, UAE reasons that approving the RFP effectively binds the Commission and requires approval of the specific resource selected in the RFP.⁵⁹ While UAE is correct that the factors enumerated to define the public interest are the same in the solicitation and resource approval statutes, both the subject matter under consideration and the information available are entirely different.

The Commission’s approval of a solicitation process is an intermediate decision—akin to an interlocutory ruling—in the context of the underlying resource approval.⁶⁰ An RFP docket is commonly followed by a resource approval request, demonstrating this connection.⁶¹ In its Order, the Commission emphasizes that it will scrutinize the Company’s selected resource based on the

⁵⁷ UAE Petition at 3-4.

⁵⁸ UAE Petition at 6-7.

⁵⁹ UAE Petition at 6.

⁶⁰ *Emp’rs’ Reinsurance Fund v. Utah Labor Comm’n*, 304 P.3d 470, 471 (Ut. App. 2013) (“[A]n order of [an] agency is not final so long as it reserves something for the agency for further decision.”) (quoting *Sloan v. Bd. of Review*, 781 P.2d 463, 464 (Ut. App. 1989)).

⁶¹ See, e.g., *In the Matter of the Application of PacifiCorp, by and Through its Rocky Mountain Power Division, for Approval of a Solicitation Process; In the Matter of the Application of Rocky Mountain Power for Approval of a Significant Energy Resource Decision Resulting from the All Source Request for Proposals*, Dockets No. 07-035-94, 10-035-126, Report and Order (Apr. 20, 2011) (treating dockets as consolidated).

results of the RFP and the Company's response to the Commission's suggestion to consider solar bids.⁶²

Moreover, the information considered in the solicitation and resource approval stages is different.⁶³ In this case, the additional information will include the results of the solar RFP. Thus, the Commission will apply the same factors to a different set of facts, which does not necessarily guarantee the same conclusion.

D. The Company met its burden of proof for approval of the 2017R RFP.

UAE argues that the Commission's reference to "inconclusive" evidence in the record indicates that the Company did not meet its burden to demonstrate that the proposed solicitation complies with the requirements of the Act.⁶⁴ The inconclusive evidence, however, related to whether the 2017R RFP needed to include solar resources—UAE's recommendation—not whether the RFP without solar resources met the public interest requirement. The fact that there was inconclusive evidence to support UAE's recommendation does not impermissibly shift the burden to UAE or indicate that the Company's filing lacked substantial evidence to support the Commission's findings. As discussed above, the Order and the robust record in this case fully supports the Commission's conclusion that the 2017R RFP is in the public interest.

III. CONCLUSION

The Commission should deny UAE's petition. The Company has agreed to a concurrent solar solicitation process that fully addresses UAE's requested relief. The Order includes the

⁶² Order at 9 (noting that, if PacifiCorp "chooses not to accept the suggested modification, it will have to defend that decision in future dockets").

⁶³ Rebuttal Testimony of Wayne J. Oliver at 13 (Sept. 13, 2017) ("IE Rebuttal") (noting that the nature of the specific resources, including whether those resources will be the lowest reasonable cost, "will not be known at the time of issuance at the RFP").

⁶⁴ UAE Petition at 10.

requisite findings that the 2017R RFP complies with the Act and is in the public interest. In addition, the Commission reasonably relied on the IE's findings and recommendations, as envisioned by the Act. Although the Order does not restate the IE's extensive findings, the Commission's adoption of and reliance on the IE's findings and conclusions is sufficient.

Respectfully submitted this 7th of November, 2017.



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CERTIFICATE OF SERVICE

Docket No. 17-035-23

I hereby certify that on November 7, 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

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