

November 17, 2017

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Secretary

RE: Status Update  
In the Matter of the Application of PacifiCorp d/b/a Rocky Mountain Power's  
Request for a Declaratory Ruling regarding the Allocation of Interconnection  
Costs under the Public Utility Regulatory Policies Act.  
Docket No. 17-035-25

Dear Mr. Widerburg:

PacifiCorp d/b/a Rocky Mountain Power provides this status update as requested by the Public Service Commission of Utah ("Commission") in its June 19, 2017 order.<sup>1</sup> Rocky Mountain Power wishes to continue its request for a declaratory ruling. Due, however, to the overlapping nature of the issues in this declaratory ruling docket and in the docket in which Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC ("Glen Canyon") filed a request for agency action,<sup>2</sup> Rocky Mountain Power requests that this declaratory ruling docket remain stayed until the Commission issues an order in the Glen Canyon docket.

On May 1, 2017, Rocky Mountain Power filed a request for a declaratory ruling requesting clarification that the Commission rules and orders require a qualifying facility ("QF") to pay for all interconnection costs necessary to allow Rocky Mountain Power to receive the QF's net output on a firm basis. Parties filed comments and reply comments on June 1, 2017, and June 14, 2017, respectively. On June 19, 2017, the Commission suspended the docket and stayed the proceeding at the request of the parties.

On June 7, 2017, Glen Canyon filed a request for agency action. While the nature of the request evolved during the course of the proceeding, Glen Canyon ultimately sought, among other things, an order from the Commission directing PacifiCorp to make certain assumptions when

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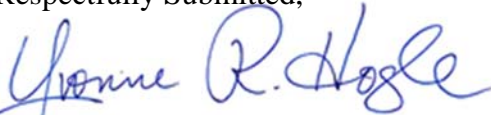
<sup>1</sup> *In the Matter of PacifiCorp d/b/a Rocky Mountain Power's Request for a Declaratory Ruling Regarding Allocation of Interconnection Costs under the Public Utility Regulatory Policy Act (PURPA)*, Docket No. 17-035-25, Order Suspending Schedule and Staying Docket (June 19, 2017) ("The PSC directs PacifiCorp dba Rocky Mountain Power to file an update with the PSC on or before November 17, 2017, to apprise the PSC as to whether it wishes to pursue its request for declaratory ruling.").

<sup>2</sup> *See In the Matter of Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC's Request for Agency Action to Adjudicate Rights and Obligations under PURPA, Schedule 38 and Power Purchase Agreements with Rocky Mountain Power*, Docket No. 17-035-36, Request for Agency Action (June 7, 2017).

preparing Glen Canyon's QF interconnection studies.<sup>3</sup> The Commission held a hearing on the Glen Canyon request for agency action on October 5-6, 2017. On October 31, 2017, the Commission issued a Consolidated Notice of Decision indicating that Glen Canyon's request would be denied in a subsequent order.<sup>4</sup>

Because both proceedings involve QF interconnection issues, Rocky Mountain Power requests that this declaratory ruling docket remain stayed until the Commission issues an order in the Glen Canyon request for agency action docket, as that future order may address or resolve certain issues in the declaratory ruling docket.

Respectfully Submitted,



Yvonne R. Hogle,  
Assistant General Counsel, Rocky Mountain Power

Cc: Service List

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<sup>3</sup> See *In the Matter of Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC's Request for Agency Action to Adjudicate Rights and Obligations under PURPA, Schedule 38 and Power Purchase Agreements with Rocky Mountain Power*, Docket No. 17-035-36, Consolidated Notice of Decision and Notice of Deadline to File Stipulation or Motion to Stay Order at n.2 (October 31, 2017) ("Although Glen Canyon's articulation of its requested relief has evolved during this proceeding, the PSC understands the primary relief Glen Canyon seeks is an order from the PSC directing RMP to make representations to PacifiCorp Transmission, or to take other action as necessary, to ensure PacifiCorp Transmission makes certain, specified assumptions with respect to RMP's transmission and redispatch rights in preparing studies related to interconnection service and transmission service for Glen Canyon's projects. We give notice here we will not issue such an order for reasons we will explain in a forthcoming order.").


<sup>4</sup> *Id.*

**CERTIFICATE OF SERVICE**

Docket 17-035-25

I hereby certify that on November 17, 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

<b><u>Utah Office of Consumer Services</u></b> Cheryl Murray - <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a> Michele Beck - <a href="mailto:mbeck@utah.gov">mbeck@utah.gov</a> Steven Snarr – <a href="mailto:stevensnarr@agutah.gov">stevensnarr@agutah.gov</a>	
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