Gary A. Dodge (0897)
Phillip J. Russell (10445)
HATCH, JAMES & DODGE, P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Facsimile: (801) 363-6666
Email: gdodge@hjdlaw.com
prussell@hjdlaw.com

Counsel for Glen Canyon Solar A, LLC &
Glen Canyon Solar B, LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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

GLEN CANYON SOLAR'S REPLY IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

INTRODUCTION

Pursuant to Utah Code Ann. § 63G-4-204(1), Utah Admin. Code R746-1-105, R746-1-203, and the Public Service Commission of Utah ("**Commission**") August 25, 2017 Order Granting Motion to Amend Procedural Schedule, Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC (collectively "**Glen Canyon Solar**") submit this Reply to Rocky Mountain Power's ("**RMP**") September 8, 2017 Response to Glen Canyon Solar's Motion for Preliminary Injunction ("**RMP Response**").

BACKGROUND

Glen Canyon Solar filed the August 11 Motion for Preliminary Injunction ("**Motion**") based in part on concerns that the System Impact Study (**"SIS"**) to be

performed by PacifiCorp Transmission ("**PacTrans**") for the Glen Canyon Solar qualifying facility ("**GC QF"**) projects would be complete by the time that the Commission issued a ruling on the merits of this case and that any order in Glen Canyon Solar's favor would cause PacTrans to begin a new study with the GC QFs at or near the bottom of the queue, causing many months of additional delay. Those concerns were based on communications from PacTrans that the SIS for the Glen Canyon Solar projects would be completed by mid-September 2017. Since the filing of the Motion, PacifiCorp has indicated that the SIS for the GC QFs has been further delayed:

> "PacifiCorp's transmission function expects to begin the [SIS] for Glen Canyon Solar's interconnection requests in late October 2017 and expects to complete the SIS in late December 2017. These dates assume no significant changes to higher-queued interconnection requests proposed in other areas of PacifiCorp's transmission system that impact the Glen Canyon Solar projects, which could result in delays."[1]

In the event that PacTrans starts the SIS process and/or issues the SIS for the GC QFs prior to a Commission ruling on the merits of Glen Canyon Solar's Request for Agency Action in favor of Glen Canyon Solar, PacTrans would be required to revise an SIS that is already underway or conduct a new study for the GC QFs in accordance with the Commission Order. Due to the deadlines associated with Glen Canyon Solar's power purchase agreements with RMP, the irreparable harm suffered by Glen Canyon Solar would be compounded.[2] For these reasons, Glen Canyon Solar's Motion remains ripe for adjudication and an Order issuing the relief requested remains appropriate.

[1] Rocky Mountain Power Response to Glen Canyon Solar Data Request 2.5 (Sept. 12, 2017), a copy of which is attached as Exhibit A.
[2] *See* Glen Canyon Solar Motion for Preliminary Injunction at 25-28.

SUMMARY OF ARGUMENT

Glen Canyon Solar's Motion satisfies the Utah Rule of Civil Procedure 65A requirements for injunctive relief and the Commission has jurisdiction and the authority to issue the requested relief. The Utah legislature granted the Commission broad powers to regulate the activities of public utilities in Utah and the Commission's authority to issue the relief requested in the motion is fundamental to the Commission's exercise of those powers. Moreover, the Commission's jurisdiction over the GC QFs' interconnection includes the Commission's oversight of the interconnection study process and the determination and allocation of interconnection costs. RMP's claims that the Commission is prohibited from issuing the injunctive relief requested in the Motion and that the Commission does not have jurisdiction over the subject matter are unsupported and unsupportable and should be rejected.

Glen Canyon Solar's Motion satisfies the requirements for preliminary injunction and simply requests that the Commission preserve its ability to issue meaningful relief to Glen Canyon Solar should the Commission rule in Glen Canyon Solar's favor on the merits of the Request for Agency Action. The potential for further delay in the SIS process, and the consequences of such delay, are particularly concerning considering that the initial anticipated completion date for the SIS was already well outside of the three month time frame provided in the OATT.[3] PacifiCorp's revised SIS start and completion

[3] PacifiCorp OATT, Section 42.4, Interconnection System Impact Study Procedures ("Transmission Provider shall use Reasonable Efforts to complete the Interconnection System Impact Study within ninety (90) Calendar Days after the receipt of the Interconnection System Impact Study Agreement or notification to proceed, study payment, and technical data.").

dates heighten this concern and compound the consequences of further delay.[4] PacifiCorp should not be given further opportunities to delay the SIS or continue to frustrate the development of the GC QFs. Granting the relief requested in the Motion ensures that such an outcome is avoided by preserving the ability of the Commission to issue an order on the merits that can provide meaningful relief to Glen Canyon Solar.

ARGUMENT

Glen Canyon Solar's Motion satisfies the requirements for injunctive relief set forth in Utah Rule of Civil Procedure 65A and the Commission has the subject matter jurisdiction and the authority to grant the requested relief. RMP's arguments to the contrary are unsupported by the Utah Code and Commission precedent, are based upon mischaracterizations of Glen Canyon Solar's requested relief in the Motion and the Request for Agency Action, and rely on inaccurate distinctions between interconnection and transmission service for QFs with respect to interconnection studies and inaccurate interpretations of the Commission's jurisdiction and rules governing QF interconnections and cost allocation under PURPA.

A. The Commission has the Authority to Issue an Order Providing the Requested Relief.

The Utah Code grants the Commission broad powers to supervise public utilities operating in Utah and specifically provides the Commission the authority to issue orders, rules, or regulations to direct a public utility to remedy any practices, service, or methods that the Commission finds are unjust, unreasonable, unsafe, improper or insufficient.[5]

[4] *See* Glen Canyon Solar Motion for Preliminary Injunction at 28-29 (discussing the consequences of further delay in the SIS process).
[5] Utah Code Ann. § 54-4-1 ("The commission is hereby vested with power and jurisdiction to supervise and regulate every public utility in this state, and to supervise all

Glen Canyon Solar's Motion requests that the Commission issue an order directing PacifiCorp to remedy the practices and methods by which it is communicating and/or processing interconnection studies for the GC QFs in order to preserve the Commission's ability to issue a decision on the merits capable of granting Glen Canyon Solar meaningful relief. Those sections of the Utah Code cited by RMP (§§ 54-7-24 and 63G-4-501) provide mechanisms by which to enforce an existing agency order through a civil proceeding.[6] Those provisions do not operate as a limitation on the Commission's authority to supervise PacifiCorp or issue an order directing PacifiCorp to remedy improper activities or actions in the first instance.

Moreover, the Commission's power in this docket comes from PURPA and FERC regulations implementing PURPA. FERC regulations implementing PURPA "afford state regulatory authorities . . . latitude in determining the manner in which the regulations are to be implemented. Thus, a state commission may comply with the statutory requirements by issuing regulations, by resolving disputes on a case-by-case basis, or by taking any other action reasonably designed to give effect to FERC's rules."[7]

---

of the business of every such public utility in this state, and to do all things, whether herein specifically designated or in addition thereto, which are necessary or convenient in the exercise of such power and jurisdiction. . . ."); Utah Code Ann. § 54-4-7 ("Whenever the commission shall find, after a hearing, that the rules, regulations, practices, equipment, appliances, facilities, or service of any public utility, or the methods of manufacture, distribution, transmission, storage or supply employed by it, are unjust, unreasonable, unsafe, improper, inadequate or insufficient, the commission shall determine the just, reasonable, safe, proper, adequate or sufficient rules, regulations, practices, equipment, appliances, facilities, service or methods to be observed, furnished, constructed, enforced or employed, and shall fix the same by its order, rule or regulation. . . .").

[6] Rocky Mountain Power's Response to Glen Canyon Solar's Request for Preliminary Injunction at 4-5 (Sept. 8, 2017)

[7] *FERC v. Mississippi*, 456 U.S. at 751. *See also id.* at 760 ("FERC has declared that state commissions may implement this by, among other things, 'an undertaking to resolve

Under PURPA, a state commission "has jurisdiction to entertain claims analogous to those granted by PURPA, and it can satisfy [PURPA's] requirements simply by opening its doors to claimants."[8] Moreover, Schedule 38 acknowledges the Commission's authority to entertain and resolve disputes related to QF interconnections, including the Commission's jurisdiction over QF power purchase agreements (**"PPA"**) and large QF interconnection agreements when, as here, all of the GC QFs' output is sold exclusively to PacifiCorp.[9] As such, this Commission may implement PURPA and FERC regulations by issuing orders requiring compliance with PURPA, including orders granting injunctive relief.

B. The Commission has Subject Matter Jurisdiction over the Issues in Dispute in this Proceeding.

The Commission's jurisdiction over the disputed issues in this proceeding stem from its jurisdiction over regulated utilities and over QF interconnections pursuant to PURPA, which include the oversight of the QF interconnection process and the determination and allocation of interconnection costs.[10] The Commission has jurisdiction

---

disputes between qualifying facilities and electric utilities arising under [PURPA].'" (quoting CFR § 292.401(a) (1980)).

[8] *Id*. at 760.

[9] *See* Schedule 38 at Section III, Sheet No. 38.11 (noting the Commission's informal and formal dispute resolution processes and stating that they "are available for any matter as to which the Commission has jurisdiction, which may include (i) QF PPA contracts . . . and (iii) large QF interconnection agreements . . . ."). The Commission has also "acknowledge[d] it has a role in regulating and allocating interconnection costs under [PURPA] and attendant federal regulations." *See In the Matter of the Utah Public Service Commission Exercising Jurisdiction over Schedule 38 and, as Adopted, PacifiCorp's OATT Part IV*, Docket No. 15-2582-01 (Order dated Oct. 22, 2015).

[10] *See e.g. In the Matter of the Utah Public Service Commission Exercising Jurisdiction over Schedule 38 and, as Adopted, PacifiCorp's OATT Part IV*, Docket No. 15-2582-01 (Order dated Oct. 22, 2015) (in which the Commission "acknowledge[d] it has a role in regulating and allocating interconnection costs under [PURPA] and attendant federal regulations"); *see also Niagara Mohawk Power Corp.*, 123 FERC § 61,143, 61,938

over RMP Schedule 38, and the authority to enforce Schedule 38's requirements that QF interconnection studies and the interconnection costs identified in those studies are conducted and assessed in a non-discriminatory manner.[11]

Throughout this docket, RMP has repeatedly sought to draw bright line distinctions between interconnection service and transmission service to support its untenable argument that the Commission lacks jurisdiction to grant Glen Canyon Solar's requested relief from discrimination by PacifiCorp. The distinctions between interconnection service and delivery service are not nearly as stark as RMP has suggested, especially with respect to Network Resource Interconnection Service ("**NRIS**"), which RMP claims in this docket that a QF should be required to utilize. In fact, PacifiCorp's own OATT and standard interconnection agreements undermine RMP's claims.

PacifiCorp's standard Large Generator Interconnection Agreement (**"LGIA"**), included as Attachment D to the OATT, states that when a QF "satisfies the requirements for obtaining [NRIS], any future transmission service request for delivery from the [QF] within [PacTrans'] System of any amount of capacity and/or energy, up to the amount initially studied, will not require that any additional studies be performed or that any further upgrades associated with such [QF] be undertaken . . . ."[12] In other words, the studies conducted for obtaining NRIS necessarily address delivery considerations that are also addressed in response to a transmission service request. The studies address the same

---

(FERC May 15, 2008) ("When an electric utility is obligated to interconnect under [18 C.F.R. § 292.303], that is, when it purchases the QF's total output, the relevant state authority exercises authority over the interconnection and the allocation of interconnection costs").

[11] Schedule 38 Section II. B.

[12] LGIA § 4.1.2.2.

needs for capacity and/or energy deliverability. Indeed, RMP acknowledges and relies upon this overlap between the interconnection and transmission studies when it comes to assigning delivery-related costs to QFs,[13] but ignores the overlap when it comes to identifying solutions that would avoid unnecessary costs to the GC QFs and/or RMP's customers.[14] The fact is that studies performed for NRIS can and do identify network upgrades required to meet deliverability requirements—as do studies performed in response to a transmission service request—and PacTrans should have the same ability to consider transmission customer rights and redispatch options that might avoid network upgrades to meet deliverability needs in both contexts.

RMP also repeatedly argues that because the NOA Amendment applies only to transmission service, the operational redispatch tools discussed in that NOA Amendment cannot apply to interconnection service. RMP's argument is not only incorrect, it is also based upon a mischaracterization of Glen Canyon Solar's arguments. As an initial matter, FERC rulings make clear that interconnection service is not separate and distinct from

---

[13] *See* Direct Testimony of Rocky Mountain Power Witness Rick A. Vail ("Vail Dir. Test.") at 7:150-153 (acknowledging the overlap between interconnection service and transmission service: ". . . the scope of the facility additions and upgrades required for NR interconnection service will include those required to ensure the output of the resource can be taken by PacifiCorp ESM and delivered to load on firm network transmission service"); *id.* at 15:311-314 ("Where a QF's NR interconnection request requires facilities or network upgrades that are not required by PacifiCorp's long-term transmission plan or for a higher-queued customer's request, the QF interconnection customer is responsible for bearing the cost of those facilities or upgrades . . . .").

[14] *Id.* at 21:454-22:467 (arguing that NOA amendment does not apply to interconnection service and that "the NOA amendment simply allows PacifiCorp to meet its PURPA must-take obligations by providing firm *transmission* service to deliver QFs, while at the same time avoiding the need to undertake potentially uneconomic transmission expansions") (emphasis in original); *see also* Rocky Mountain Power Response to Glen Canyon's Motion for Preliminary Injunction at 10 (arguing that the NOA amendment redispatch options should not be considered in an interconnection study).

transmission service. Rather interconnection service is a *part* of transmission service.[15] The other part of transmission service is delivery, an aspect of which is studied in studies for NRIS. RMP incorrectly assumes that the use of the NOA Amendment in the context of securing transmission service for the GC QFs does not (and should not) inform the interconnection study component of RMP's PURPA obligations to purchase the GC QFs output and deliver that output on a firm basis. RMP also misconstrues Glen Canyon Solar's arguments as solely dependent upon RMP utilizing the NOA redispatch options and ignores the fact that RMP has existing transmission rights upon which it can transmit the GC QFs' output in conjunction with other redispatch options.

For instance, the operational redispatch tools available to PacifiCorp, including those discussed in the NOA Amendment, were available to RMP to back down generation resources *before* RMP sought permission from FERC to amend the NOA to allow it to use that tool for the specific application discussed in the NOA Amendment—to avoid unnecessary transmission network upgrades when QFs are located in transmission constrained areas. RMP has always had the ability to back down certain generation resources to provide additional transmission capacity for other generation resources. For example, PacifiCorp proposes to use operational redispatch, whether through the NOA Amendment procedures or through other redispatch protocols, in connection with its proposed wind and transmission projects in Wyoming, by backing

[15] *See, e.g.*, *Tennessee Power Co.*, 90 FERC ¶ 62,238 at ¶ 61,761 (FERC 2000) (discussing separately "the interconnection component of transmission service" and the "delivery component of transmission service").

down Jim Bridger to make room for new wind resources and to avoid the need for even greater transmission system investments.[16]

Contrary to RMP's claim, Glen Canyon Solar is not asking the Commission to wade into matters that are solely FERC-jurisdictional. Rather, Glen Canyon Solar is asking the Commission to require PacTrans to process the interconnection studies for the GC QFs in a manner that is consistent with RMP's PURPA obligations. PURPA requires RMP to purchase and deliver the GC QFs output on a firm, non-discriminatory basis, and to dispatch its other resources in a manner that ensures that QFs are not curtailed.[17]

The Commission's jurisdiction and powers are certainly broad enough to allow it to ensure that QF interconnections and interconnection costs are processed and assessed in accordance with PURPA and in a non-discriminatory manner. In *Pioneer Wind Park I, LLC,* the Federal Energy Regulatory Commission ("**FERC**") emphasized that (1) a QF's obligation to the purchasing utility is limited to delivering the QF's energy to the point of interconnection with the purchasing utility, (2) the QF is not required to obtain transmission service, either for itself or on behalf of the purchasing utility, in order to deliver its energy beyond the point of interconnection to the purchasing utility's load; and

[16] *See Application for Approval of a Significant Energy Resource Decision and Voluntary Approval of Resource Decision*, Docket No. 17-035-40, June 30, 2017 Redacted Direct Testimony of Rick A. Vail at 9-10 (describing "the re-dispatch of Jim Bridger generation necessary to accommodate new wind generation in eastern Wyoming."). Glen Canyon Solar submitted data requests to PacifiCorp seeking additional information about the redispatch used to accommodate the Wyoming wind generation in Docket No. 17-035-40 but PacifiCorp refuses to provide relevant responsive information and documents. *See* Glen Canyon Solar's Motion for Formal Discovery and Statement of Discovery Issues (Sept. 13, 2017).

[17] *E.g.*, *Pioneer Wind Park I, LLC*, 145 FERC ¶ 61,215, at P. 38 (2013).

(3) the purchasing utility cannot curtail the QF's energy as if the QF were taking non-firm transmission service on the purchasing utility's system.[18]

FERC precedent is clear that RMP must use or obtain firm transmission service for the GC QFs, and must redispatch its other network resources in a manner that ensures that the GC QFs are not curtailed ahead of RMP's other resources. Because RMP is the transmission customer, it is authorized to direct PacTrans to perform the interconnection study in a manner that assesses potential transmission options and impacts, including various forms of planning and operational redispatch such as those available under its NOA with PacTrans and Section 32.3 of the OATT, to avoid unnecessary Network Upgrades when a QF is added as a designated network resource at an interconnection point with no remaining available transmission capacity. These options allow RMP to operate other network resources such that the QF can be designated as a network resource and RMP can purchase the QF's full output and transmit it to load, while at the same time avoiding the need to construct certain network upgrades. These transmission redispatch protocols allow a utility to fulfill its PURPA obligations to the QF,[19] while also satisfying the customer indifference standard by ensuring that customers will not pay for unnecessary and uneconomic Network Upgrades.[20]

---

[18] *Id.*at P. 36 ("The Commission's PURPA regulations permit a purchasing utility to curtail a QF's output in two circumstances: (1) in system emergencies pursuant to section 292.307(b) of the Commission's regulations; or (2) in light load periods pursuant to section 292.304(f) of the Commission's regulations, but only if the QF is selling its output on an "as available basis.").

[19] *See e.g., Id.*, at P. 38 (2013).

[20] 16 U.S.C. § 824a-3(b). FERC has interpreted Congress' intent in PURPA "to make ratepayers indifferent as to whether the utility used more traditional sources of power or the newly encouraged alternatives." *Southern Cal. Edison, San Diego Gas & Elec.*, 71 FERC ¶ 61,269 at p. 62,080 (1995).

RMP's PURPA obligations require RMP to obtain firm transmission service and operate its other network resources in a manner that ensures the GC QFs are dispatched ahead of RMP's other resources (i.e. not curtailed in violation of PURPA). RMP's arguments incorrectly imply that these obligations have no bearing on the interconnection studies that determine whether *transmission service* related network upgrades are necessary to transmit the interconnecting generator's output. Indeed, PacTrans has communicated to Glen Canyon that absent an indication of such intent by RMP, PacTrans will not conduct the interconnection SIS for the GC QFs in a manner that assumes that RMP will utilize its existing transmission rights or redispatch its other network resources in a manner that ensures the GC QFs are not curtailed ahead of RMP's other network resources.

Permitting PacifiCorp to conduct the interconnection SIS without taking into account RMP's obligations to provide firm transmission service on behalf of the GC QFs and give priority to QFs over non-QF resources will result in an SIS that mistakenly identifies the same or similar transmission system network upgrades that were identified in the SIS for Glen Canyon Solar's 138 MW *non*-QF project.[21] Such a result would have the practical effect of requiring the GC QFs to secure their own transmission service to ensure that they are not curtailed. This result would effectively relieve RMP of its PURPA obligations to obtain firm transmission service for the GC QFs and give priority to the GC QF resources over RMP's other resources by requiring Glen Canyon Solar to construct transmission network upgrades that will "allow" RMP deliver the GC QF's

[21] *See* Docket No. 17-035-25, Rocky Mountain Power's Request for a Declaratory Ruling Regarding Allocation of Interconnection Costs Under the Public Utility Regulatory Policies Act (May 3, 2017), Attachment A, Large Generator Interconnection System Impact Study Report, Completed for Interconnection Customer Q 0170, July 27, 2016.

output to RMP's load without utilizing any of RMP's existing transmission rights or redispatching other RMP's resources. Moreover, RMP wishes to impose the costs of the unnecessary transmission network upgrades on the GC QFs, which would violate the GC QFs PURPA rights, and correspondingly, RMP's PURPA obligations.

The Commission clearly has jurisdiction and oversight authority sufficient to determine whether a utility is acting in violation of PURPA or discriminating against an interconnecting QF. It also clearly the power to issues such orders as are necessary to direct the utility to remedy such violations and discriminatory activity –whatever it chooses to call its order exercising that authority.

C. Glen Canyon Solar 's Motion Meets the Standard for a Preliminary Injunction

The RMP Response is unduly focused on technical aspects of a preliminary injunction. It is not important what the Commission calls its order. Glen Canyon Solar is asking the Commission to exercise its jurisdiction by directing RMP and PacTrans to communicate and interact with respect to interconnection studies in a manner that will preserve the Commission's practical ability to grant meaningful relief in the event Glen Canyon Solar prevails on the merits. The Commission can certainly require RMP to comply with its federal and state PURPA-related obligations and to take actions necessary now to ensure the same, however it chooses to label its order. In any event, however, Glen Canyon Solar's Motion establishes each of the elements required for a preliminary injunction.

First, as described above, and in the Motion, if PacTrans starts the interconnection SIS for the GC QFs prior to a Commission decision on the merits and the Commission ultimately decides in Glen Canyon Solar's favor, the GC QFs are in jeopardy of

irreparable harm as PacTrans would have to conduct a new or revised SIS. Any additional delays in the interconnection study process will put the GC QF projects in serious jeopardy of being unable to meet the construction, commercial operation date, and other timelines established in the GC QF PPAs.

Second, as further described in the Motion, the threatened injury to Glen Canyon Solar greatly outweighs the burden of PacTrans conducting an SIS as requested by Glen Canyon Solar. RMP's arguments that granting the relief requested in the Motion would shift the costs of interconnecting the GC QFs to RMP's customers is inapposite and wholly unsupported by the injunctive relief requested. Granting Glen Canyon Solar's Motion will only preserve the Commission's ability to provide meaningful relief to Glen Canyon Solar, should the Commission ultimately decide in favor of Glen Canyon Solar on the merits in this docket. RMP's arguments on this point also fail to acknowledge that a ruling in favor of Glen Canyon Solar's Request for Agency Action would require PacTrans to conduct the interconnection SIS in a manner that may well avoid the very need for the costly network upgrade costs that RMP's fears will be borne by its customers.

Third, granting Glen Canyon Solar's Motion would not be contrary to the public interest. Instead, it would preserve the Commission's ability to grant meaningful relief to Glen Canyon Solar and allow customers access to renewable energy at the same or lower costs than currently provided by RMP. Moreover, granting Glen Canyon Solar's Motion will not presuppose any decision on the merits. In the event that the Commission were to agree with RMP's arguments in disposition of the Request for Agency Action, having

granted Glen Canyon Solar's Motion will not result in any adverse outcomes as posited by RMP.

Fourth, there is a substantial likelihood that Glen Canyon Solar will prevail on the merits of this case and there are serious issues that should be preserved for further litigation. The Commission has the jurisdiction and authority to grant the relief requested in Glen Canyon's Request for Agency Action, but its ability to grant meaningful relief is predicated upon ensuring that further delays in the interconnection study process will be avoided.

Granting Glen Canyon Solar's Motion would do nothing but require RMP to study the GC QFs in accordance with RMP's PURPA obligations by incorporating the assumption that the GC QFs will be delivered using RMP's existing transmission rights and/or through redispatch of other network resources to allow the GC QFs to be delivered to load on a firm basis and not be subject to curtailment in violation of PURPA. Should the Commission ultimately decide the Request for Agency Action in Glen Canyon Solar's favor, Glen Canyon Solar will be in a position to move forward without additional concern that avoidable delays in the interconnection process will jeopardize the viability of the projects.

CONCLUSION

Glen Canyon Solar's Motion satisfies the requirements for injunctive relief pursuant to Utah R. Civ. Pro. 65A and Glen Canyon Solar requests that the Motion be granted for the reasons set forth above, and as further set forth in Glen Canyon Solar's Motion and Request for Agency Action.

DATED this 18th day of September 2017.

Respectfully submitted

HATCH, JAMES & DODGE, P.C.

By: /s/*Gary A. Dodge*
Gary A. Dodge
Phillip J. Russell

Attorneys for Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC

Certificate of Service
Docket No. 17-035-36

I hereby certify that a true and correct copy of the foregoing was served by email this 18th day of September 2017 on the following:

ROCKY MOUNTAIN POWER

Jeff Richards	robert.richards@pacificorp.com
Yvonne Hogle	yvonne.hogle@pacificorp.com
Bob Lively	bob.lively@pacificorp.com

PACIFIC POWER

Sarah K. Link	sarah.kamman@pacificorp.com
Karen J. Kruse	karen.kruse@pacificorp.com

DIVISION OF PUBLIC UTILITIES

Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Patricia Schmid	pschmid@agutah.gov
Justin Jetter	jjetter@agutah.gov

OFFICE OF CONSUMER SERVICES

Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov
Steven Snarr	stevensnarr@agutah.gov
Robert Moore	rmoore@agutah.gov

ARIZONA PUBLIC SERVICE COMPANY

Jennifer L. Spina	jennifer.spina@pinnaclewest.com
Elizabeth Brereton	lbrereton@swlaw.com

/s/ Gary A. Dodge

EXHIBIT A

Glen Canyon Solar Data Request 2.5

Please state when PacifiCorp expects to begin the Interconnection System Impact Studies for the Glen Canyon Solar projects at issue in this docket (and Docket Nos. 17-035-26 and -28) and when PacifiCorp expects that study to be completed.

Response to Glen Canyon Solar Data Request 2.5

PacifiCorp's transmission function expects to begin the system impact study (SIS) for Glen Canyon Solar's interconnection requests in late October 2017 and expects to complete the SIS in late December 2017. These dates assume no significant changes to higher-queued interconnection requests proposed in other areas of PacifiCorp's transmission system that impact the Glen Canyon Solar projects, which could result in delays.