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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| <p>In the Matter of Rocky Mountain Power's Avoided Cost Input Changes Quarterly Compliance Filing</p> | <p>DOCKET NO. 17-035-37</p> <p>Utah Clean Energy Notice of Challenge and Request for Scheduling Conference</p> |
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Pursuant to the Commission's Order in Docket No. 14-035-140, Utah Clean Energy submits this notice of challenge to proposed avoided cost pricing updates and requests a scheduling conference to set a schedule to address relevant issues.

In Docket No. 14-035-140, the Commission approved an uncontested settlement stipulation that addressed Schedule 38 queue management, power purchase agreement milestones, and avoided cost modeling updates and associated procedures. Paragraph 23 of the stipulation provides:

23. The Parties agree to the following schedule to address contested Routine Updates and Non-Routine Updates, which may include those identified in a quarterly compliance filing:
 - a. Parties will file a notice with the Commission within three weeks after the Company files its quarterly compliance filing, to identify which specific assumptions, if any, they intend to contest. Failure of any party to file such notice will not preclude later

challenges, but will result in incorporation of unchallenged Non-Routine Updates into avoided cost modeling.

b. A party filing a challenge will ask the Commission to hold a scheduling conference to set a reasonable schedule to address any challenges or other relevant issues. [Docket No. 14-035-140, *Attachment to Order Approving Settlement Agreement on Schedule 38 Procedures (Settlement Stipulation)* (issued June 9, 2015), pages 7-8.]

On June 21, 2017, Rocky Mountain Power filed its 2017.Q1 Avoided Cost Input Changes Quarterly Compliance Filing, containing routine and non-routine updates to Schedule 38 pricing. The routine updates include updates to GRD to reflect the results of the 2017 IRP, a new official forward price curve, a load forecast update, and changes to the QF queue. Non-routine updates include changes to REC ownership and “post-IRP resource expansion plan pricing.”

Utah Clean Energy plans to contest Rocky Mountain Power’s non-routine change to REC ownership. Utah Clean Energy may also contest, but would like additional information from Rocky Mountain Power before making a final determination on, additional issues including the following:

- The “post-IRP resource expansion plan pricing” non-routine update. Utah Clean Energy believes there is insufficient information in the Company’s filing to make a determination of its reasonableness at this time.
- The impact of the 2017 IRP on the Proxy/PDDRR avoided cost method. Utah Clean Energy would like additional information on the impact of the 2017 IRP on the Schedule 38 pricing method, including the periods of resource sufficiency and deficiency and next deferrable resources.

Utah Clean Energy requests that the Commission notice a scheduling conference to set a reasonable schedule for addressing these and associated relevant issues. Utah Clean Energy believes a technical conference will aid in clarifying and resolving these issues.

DATED 12th day of July, 2017.

Respectfully submitted,
Utah Clean Energy

/s/ _____
Sophie Hayes
Attorney for Utah Clean Energy

CERTIFICATE OF SERVICE

Docket No. 17-035-37

I hereby certify that a true and correct copy of the foregoing was served by email this 12th day of July, 2017, on the following:

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/s/ Sophie Hayes