

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain)	
Power's Proposed Tariff Revisions)	Docket No. 17-035-T07
To Electric Service Schedule No. 37,)	
Avoided Cost Purchases from)	
Qualifying Facilities)	Docket No. 17-035-37
)	
In the Matter of Rocky Mountain)	Rebuttal Testimony of
Power's 2017 Avoided Cost Input)	Cheryl Murray for the
Changes Quarterly Compliance)	Office of Consumer Services
Filing)	

October 31, 2017

1 **Q. WHAT IS YOUR NAME, TITLE, AND BUSINESS ADDRESS?**

2 A. My name is Cheryl Murray. I am a utility analyst for the Office of Consumer
3 Services (Office). My business address is 160 East 300 South, Salt Lake
4 City, Utah.

5 **Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS DOCKET?**

6 A. Yes. On October 3, 2017 I provided direct testimony on behalf of the Office.

7 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

8 A. My rebuttal testimony is very limited. I will respond only to an issue raised
9 in the direct testimony of Mr. Neal Townsend on behalf of the Renewable
10 Energy Coalition (REC).

11

12 My absence of comment on the Company's or any parties'
13 recommendations should not be taken as an indication of the Office's
14 support or disagreement with any issue I do not address.

15 **Q. PLEASE DESCRIBE THE RECOMMENDATION IN MR. TOWNSEND'S**
16 **DIRECT TESTIMONY THAT LEADS TO YOUR REBUTTAL TESTIMONY.**

17 A. One of Mr. Townsend's recommendations is that the Commission rule that
18 the 2021 Wyoming Wind resource should be considered as a proxy
19 resource for determining avoided capacity and energy costs for all
20 renewable Qualifying Facilities seeking avoided cost pricing under both
21 Schedule 37 and 38. He further recommends that "the Commission should
22 consider whether Schedule 37 and Schedule 38 renewable QFs should be
23 credited with (the equivalent of) avoided transmission costs given the

24 linkage between development of the 2021 Wyoming Wind resource and the
25 addition of the related new Wyoming transmission capability". [Townsend
26 direct testimony page 4, lines 71 – 75]

27 **Q. DOES THE OFFICE AGREE WITH MR. TOWNSEND'S**
28 **RECOMMENDATION REGARDING WYOMING WIND?**

29 A. The Office understands many of the concerns expressed by Mr. Townsend
30 and specifically endorses one of the aspects of his proposal.

31 **Q. WHAT IS THE COMPONENT OF HIS PROPOSAL THAT THE OFFICE**
32 **SUPPORTS?**

33 A. As part of Mr. Townsend's discussion regarding the inclusion of 2021
34 Wyoming Wind in QF pricing, beginning at line 66 he states "...unless and
35 until PacifiCorp declares that it is not going to pursue this project, whether
36 that declaration results from a Commission order rejecting preapproval for
37 the project in Docket 17-035-40 or for any other reason. At that point, I
38 would recommend that this resource be removed from the avoided cost
39 calculation until a new IRP is issued or PacifiCorp otherwise announces a
40 new major planned resource acquisition."

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42 If the Commission allows the 2021 Wyoming Wind resource to be included
43 in the calculation of avoided cost pricing, the Office agrees with Mr.
44 Townsend's recommendation that if for any reason the Wyoming Wind
45 projects are not pursued by the Company they should immediately be
46 removed from the calculation of avoided cost pricing. For example, if the

47 Commission denies the Company's request in Docket No. 17-035-40 for
48 pre-approval of the wind resources they should immediately be removed
49 from QF pricing consideration. The Office asserts that barring immediate
50 removal of this resource, if it becomes known that the resource certainly will
51 not be pursued, avoided cost pricing would be overvalued and the ratepayer
52 indifference standard could not be upheld.

53 **Q. DOES YOUR REBUTTAL TESTIMONY CHANGE ANY ASPECTS OF**
54 **YOUR DIRECT TESTIMONY?**

55 A. No. As stated in my direct testimony the Office supports the Company's
56 proposal that QF generated RECs should be retained by the Company for
57 the benefit of its customers when the QF defers a renewable resource that
58 would otherwise provide RECs to the Company. The Office also continues
59 to believe that including Schedule 37 QFs in the QF queue is appropriate.

60 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

61 A. Yes, it does.