

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power’s)	
Proposed Tariff Revisions to Electric Service)	Docket No. 17-035-T07
Schedule No. 37, Avoided Cost Purchases)	
From Qualifying Facilities)	Docket No. 17-035-37
In the Matter of Rocky Mountain Power’s)	
2017 Avoided Cost Input Changes Quarterly)	DPU EXHIBIT 1.0 SR
Compliance Filing)	

Sur-Rebuttal Testimony of
Abdinasir M. Abdulle, Ph.D.
Division of Public Utilities

November 21, 2017

1 **Q. Please state your name, business address, and employment for the record.**

2 A. My name is Dr. Abdinasir M. Abdulle. My business address is 160 E. 300 South, Salt
3 Lake City, Utah 84114; I am employed by the Utah Division of Public Utilities (Division
4 or DPU).

5 **Q. Are you the same Dr. Abdinasir M. Abdulle who previously provided direct and
6 rebuttal testimonies in this case on behalf of the Division of Public Utilities?**

7 A. Yes.

8 **Q. What is the purpose of your testimony?**

9 A. The purpose of my testimony is to respond to some issues discussed in the rebuttal
10 testimony of Daniel MacNeil of Rocky Mountain Power (RMP). Specifically, I will
11 address the QF queue proposal and avoided line losses. My silence about any issue
12 discussed by any witness in this proceeding should not be construed as acceptance or
13 rejection on my part.

14 **Q. In his rebuttal testimony, Mr. MacNeil indicated that the Company adjusted its
15 Schedule 37 QF queue proposal in its August 17, 2017 consolidated direct filing
16 relative to its original May 30, 2017 filing. Would you comment on this statement?**

17 A. Yes. In his rebuttal testimony, page 22, lines 468 through 472, Mr. MacNeil stated:

18 The Company's August 17, 2017 filing in Docket No. 17-035-37 used the
19 same position in the QF queue as the May filing but with updates for
20 signed contracts and projects that had dropped out, resulting in prior
21 queued resources totaling 1,436 MW of nameplate capacity. As a result,
22 the August 17, 2017 filing represented a queue position of roughly 36
23 percent.

24 This is not a change in the Company's proposal. The proposal in the May 30, 2017 filing
25 was to place the proposed QF project last in the QF pricing queue. The above quote
26 indicates that, in the August 17, 2017 filing, the position in the QF pricing queue still
27 remains the same. What changed is the fact the Company removed from the queue those
28 projects that had dropped out from the queue. A reduction in the length of the QF pricing
29 queue due to projects that dropped from the queue should not be considered as a change
30 in the position in the QF pricing queue. Therefore, as in my direct testimony, I propose
31 using the midpoint of the QF pricing queue to set Schedule 37 rates and to re-evaluate
32 this proposal in the future in a separate proceeding as appropriate based on the number of
33 QFs in the queue and the impact of the queue on the price.

34 **Q. Do you have issue with the MacNeil's response to the UCE's proposal regarding**
35 **avoided line losses?**

36 A. Yes. On page 29, lines 582 to 585, of his rebuttal testimony, Mr. MacNeil states:

37 To the extent the addition of a resource results in a surplus
38 of resources, those resources would need to be exported to
39 another area – potentially resulting in more losses than
40 would occur had the same resource been interconnected to
41 the transmission system directly.

42

43 The Division is not familiar with any scenario where adding a new resource in a load
44 center resulted in surplus requiring export to another area and therefore increased line
45 losses. Unless the Company provides evidence to this end, the Division maintains its
46 support to the UCE's proposal of crediting the QFs with the appropriate transmission line
47 losses.

48 **Q. Does this conclude your direct testimony?**

49 **A. Yes.**