

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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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	)	

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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.**