



1407 W. North Temple, Suite 320
Salt Lake City, UT 84116

November 22, 2017

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: Docket No. 17-035-39
APPLICATION FOR APPROVAL OF RESOURCE DECISION TO REPOWER WIND
FACILITIES


Rocky Mountain Power hereby submits for electronic filing an Unopposed Motion to Amend Procedural Schedule in Docket No. 17-035-39 to amend the deadlines established in the Commission's Scheduling Order, Notice of Technical Conference, Notice of Hearing, and Order Granting Extension to Exceed 180-Day Approval Deadline ("Scheduling Order"), issued July 13, 2017, in this Docket.. Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
Jana.saba@pacificorp.com
utahdockets@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,


Joelle R. Steward
Vice President, Regulation

R. Jeff Richards (#7294)
Yvonne R. Hogle (#7550)
1407 West North Temple, Suite 320
Salt Lake City Utah 84116
Telephone: (801) 220-4050
Fax: (801) 220-3299
Email: Yvonne.hogle@pacificorp.com

Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Voluntary Request of
Rocky Mountain Power for Approval of
Resource Decision to Repower Wind
Facilities

DOCKET NO. 17-035-39
UNOPPOSED MOTION TO AMEND
PROCEDURAL SCHEDULE

Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”), under the Public Service Commission Administrative Procedures Act Rules, R746-1-301, hereby moves the Public Service Commission of Utah (“Commission”) to amend the deadlines established in the Commission’s Scheduling Order, Notice of Technical Conference, Notice of Hearing, and Order Granting Extension to Exceed 180-Day Approval Deadline (“Scheduling Order”), issued July 13, 2017, in this Docket. All Parties in this docket were given notice of this Motion before filing and at the time of filing the following Parties have authorized the Company to represent that the Utah Division of Public Utilities (“Division”); the Office of Consumer Services (“Office”); the Utah Association of Energy Users (“UAE”); Utah Clean Energy (“UCE”); and Interwest Energy Alliance (“IEA”)(collectively the “Parties”) support this Motion and have agreed to the following:

1. Since the Scheduling Order was issued July 13, 2017, Congress introduced tax reform legislation that, among other things, proposes a reduction in the corporate federal income tax rate. This could affect the projected customer benefits of PacifiCorp's proposed wind repowering project. In pre-filed testimony, Parties testify that, at this time, there is significant uncertainty about this issue.

2. Rocky Mountain Power and the Parties have met informally to discuss resolution of this proceeding, including whether it is reasonable to briefly delay the deadlines in the Scheduling Order to gain more certainty on potential tax reform legislation. Legislation is now being considered by the U.S. Congress and there is an expectation that final action on tax reform legislation could occur by the end of the year. Rocky Mountain Power and the Parties therefore agree that a short extension of the deadlines in the Scheduling Order is reasonable to allow an assessment of the effects of tax reform on the economics of the wind repowering project.

3. Rocky Mountain Power proposes that the Commission amend the deadlines in the Scheduling Order as follows: vacate the hearing scheduled November 29-30, 2017; add PacifiCorp supplemental testimony – February 1, 2018; intervenor response testimony – April 2, 2018; all-party rebuttal testimony – April 23, 2018; hearing – May 3-4, 2018.

4. Rocky Mountain Power will file supplemental testimony that includes an updated economic analysis on a project-by-project basis, reflecting:

- a. determinative actions by Congress on tax reform, if known by December 31, 2017; and, if not yet known, the lowest effective corporate tax rate proposal pending or passed by either chamber of Congress as of December 31, 2017, and any provisions impacting the production tax credit still under consideration;

b. official forward price curves effective as of January 1, 2018, or the most recent official price curve available;

c. scenario analyses using assumptions for, at a minimum: 1) low gas/no CO₂, and 2) medium gas/medium CO₂; and

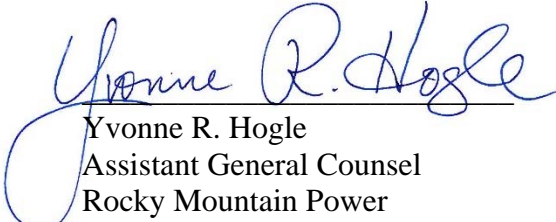
d. updates for known changes in wind repowering costs and performance, and projected changes in CO₂ costs.

5. Discovery turn-around times shall be ten (10) calendar days until April 2, 2018, and seven (7) calendar days or best efforts thereafter.

WHEREFORE and based on the foregoing, Rocky Mountain Power respectfully requests the Commission grant this Motion to Amend Procedural Schedule as proposed above.

DATED this 22nd day of November 2017.

Respectfully submitted,


Yvonne R. Hogle
Assistant General Counsel
Rocky Mountain Power

CERTIFICATE OF SERVICE

Docket No. 17-035-39

I hereby certify that on November 22, 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Cheryl Murray – cmurray@utah.gov

Michele Beck – mbeck@utah.gov

Division of Public Utilities

Erika Tedder – etedder@utah.gov

Assistant Attorney General

Patricia Schmid – pschmid@agutah.gov

Justin Jetter – jjetter@agutah.gov

Robert Moore – rmoore@agutah.gov

Steven Snarr – stevensnarr@agutah.gov

Rocky Mountain Power

Jana Saba – jana.saba@pacificorp.com

Yvonne Hogle – yvonne.hogle@pacifcorp.com

Joelle Steward – joelle.steward@pacificorp.com

McDowell Rackner Gibson PC

Katherine McDowell – katherine@mrg-law.com

Adam Lowney – adam@mrg-law.com

Pacific Power

Sarah K. Link – sarah.link@pacificorp.com

Karen J. Kruse – karen.kruse@pacificorp.com

Utah Association of Energy Users

Hatch, James & Dodge, P.C.

Gary A. Dodge – gdodge@hjdllaw.com

Phillip J. Russell – prussell@hjdllaw.com

Nucor Steel-Utah

Stone Mattheis Xenopoulous & Brew, P.C.

Peter J. Mattheis – pjm@smxblaw.com

Eric J. Lacey – ejl@smxblaw.com

Cohne Kinghorn

Jeremy R. Cook – jcook@cohnekinghorn.com

Interwest Energy Alliance

Manning Curtis Bradshaw & Bednar PLLC

Mitch M. Lonson – mlongson@mc2b.com

Tormoen Hickey LLC

Lisa Tormoen Hickey – lisahickey@newlawgroup.com

Utah Clean Energy

Sophie Hayes – sophie@utahcleanenergy.org


Kate Bowman – kate@utahcleanenergy.org

Western Resource Advocates

Jennifer E. Gardner – jennifer.gardner@westernresources.org

Nancy Kelly – nkelly@westernresources.org

Penny Anderson – penny.anderson@westernresources.org



Carol McCracken