

JUSTIN C. JETTER (#13257)
PATRICIA E. SCHMID (#4908)
Assistant Attorney Generals
Counsel for the DIVISION OF PUBLIC UTILITIES
SEAN D. REYES (#7969)
Attorney General of Utah
160 E 300 S, 5th Floor
P.O. Box 140857
Salt Lake City, UT 84114-0857
Telephone (801) 366-0335
jjetter@agutah.gov
Attorneys for the Utah Division of Public Utilities

STEVEN W. SNARR (#3022)
Special Assistant Attorney General
ROBERT J. MOORE (#5764)
Assistant Attorney General
160 East 300 South, 5th Floor
P.O. Box 140857
Salt Lake City, Utah 84114-0857
Telephone: (801) 366-0353
stevensnarr@agutah.gov
rmoore@agutah.gov
Attorneys for Utah Office of Consumer Services

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF A SIGNIFICANT ENERGY RESOURCE DECISION AND REQUEST TO CONSTRUCT WIND RESOURCE AND TRANSMISSION FACILITIES</p>	<p>Docket No. 17-035-40</p> <p>MOTION TO VACATE REMAINING SCHEDULE AND REQUEST FOR EXPEDITED TREATMENT</p>
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Pursuant to Utah Admin. Code r.746-100, the Division of Public Utilities (“Division”) and Office of Consumer Services (“Office”) (together the “Moving Parties”) file this Motion to Vacate Schedule and Request for Expedited Treatment. The Moving Parties request that the Commission vacate the remaining schedule set in the July 27, 2017 Scheduling Order and set a

scheduling conference. Rocky Mountain Power (“Company”) filed substantial new information, project selections, and analysis as part of its January 16, 2018 filing of Supplemental Direct and Rebuttal Testimony. Approval of two billion dollars of capital expenditures warrants a reasonable review that cannot be completed within the current schedule.

The Moving Parties cannot complete an analysis of the new testimony and project proposal changes in the time permitted under the current schedule. To provide some illustrative examples of the changes, the Company’s new testimony significantly changes the basis for approval of the Application. In its Application the Company described the proposed projects an “exciting opportunity for PacifiCorp’s customers” to save money.¹ Now the projects are presented as “necessary to meet an identified resource need and present no more risk than typical utility investments.”² What was once an “exciting opportunity” has morphed to “the issue is not *if* the Aeolus-to-Bridger/Anticline line will be constructed, but *when*.”³

Similarly, the Application sought approval of 860MW of new wind and a transmission line that were Company owned resources and “mutually dependent on one another.”⁴ In the new proposal there is a total of 1,170 MW of wind, that consists of 970 MW of Company owned wind and 200 MW of power purchase agreements. Not only has the project grown by over 36% from the original proposal, the new proposal also envisions a long-term power purchase agreement for a portion of one project. Additionally, one of the projects is not dependent on the new transmission line. And the transmission project that was initially considered necessary for

¹ Direct Testimony of Cindy Crane, line 27.

² Supplemental Direct Testimony of Cindy Crane, Lines 24-26.

³ *Id.* at lines 151-52 (emphasis in original).

⁴ Direct Testimony of Cindy Crane, lines 47-48.

eligibility for 100 percent PTC benefits in the Application is no longer required by 2020.⁵ Moreover, the Solar RFP process and selection is not even complete.

These examples do not attempt to capture the entire range of differences between the Application and the proposal presented in the Supplemental Direct and Rebuttal Testimony. They merely illustrate the significance of the changes in the project that the non-Company parties must now evaluate in less than a month's time. The review is not simply an updated analysis of the review of the projects proposed in the Application. More time is necessary for meaningful review and analysis of the new project proposal.

Due to the expedited schedule already in place with upcoming filing dates, the Moving Parties respectfully request that the Commission expedite the time for response and expedite its consideration of this Motion.

Submitted this 18th day of January 2018.

/s/ Justin C. Jetter

Justin C. Jetter
Assistant Attorney General
Utah Division of Public Utilities

/s/ Robert J. Moore

Robert J. Moore
Assistant Attorney General
Utah Office of Consumer Services

⁵ Compare Application at p. 6 (“Each of the Wind Projects can demonstrate eligibility for 100 percent of the PTC benefits if the Wind Projects (and the Transmission Projects discussed below) are commercially operational by December 31, 2020”) and Supplemental Direct and Rebuttal Testimony of Nikki L. Kobliha at lines 118-20 (“Wind Projects would still qualify if the Transmission Projects have facilitated synchronization to the transmission grid and commissioning of individual wind turbines...”).