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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| Application of Rocky Mountain Power for Approval of a Significant Energy Resource Decision and Request to Construct Wind Resource and Transmission Facilities | Docket No. 17-035-40 UIEC’s MEMORANDUM IN SUPPORT OF MOTION TO VACATE REMAINING SCHEDULE AND REQUEST FOR EXPEDITED TREATMENT |
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Pursuant to R746-1-301 of the Utah Administrative Code and the Notice Setting Deadlines to Respond to the Motion to Vacate Remaining Schedule issued by the Utah Public Service Commission (“PSC” or “Commission”) on January 19, 2018, the Utah Industrial Energy Consumers (“UIEC”) hereby file this Memorandum in Support of Motion to Vacate Remaining Schedule and Request for Expedited Treatment, stating as follows.

The UIEC agree with the Division of Public Utilities (“Division”) and the Office of Consumer Services (“Office”) that the Commission should expeditiously vacate the remaining schedule in the above captioned docket and convene a new scheduling conference. Rocky Mountain Power Company (“RMP” or the “Company”) has essentially submitted a new request to approve a Significant Energy Resource, identifying a different resource than originally proposed, and providing a different economic analysis in support of its new proposal. As a consequence, all of the parties, including the regulators, that have expended substantial resources over the past few months analyzing an imaginary resource, now must begin anew to address the new, actual proposal.

Furthermore, it appears that RMP's new filing is incomplete and does not meet the minimum informational requirements of the Energy Resource Procurement Act ("Act") and the Commission's associated Rule.¹ As a consequence, parties must engage in discovery before they can begin to evaluate the new proposal or understand its impact on the public interest.

Moreover, because the nature and economics of the resource have changed, there may be persons with an interest affected by the new filing who have not yet intervened. To avoid foreclosing such parties from participation, intervention should be reopened to allow all interested parties an opportunity to participate in the review of the new proposed resource.

CONCLUSION

The Commission should vacate the current schedule and set the matter for a scheduling conference, where a new schedule should be set that opens the matter for new interventions, and provides a reasonable time for parties to conduct discovery and to evaluate the Company's new \$2 billion proposal.

DATED this 24th day of January, 2018

/s/ Vicki M. Baldwin

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¹ Utah Admin. Code R746-430-2. The utility "shall include" the minimum informational requirements when it "files a request to approve a Significant Energy Resource pursuant to Section 54-17-302."

CERTIFICATE OF SERVICE

(Docket No. 17-035-40)

I hereby certify that on this 24th day of January, 2018, I caused to be e-mailed, a true and correct copy of the foregoing UTAH INDUSTRIAL ENERGY CONSUMERS' MEMORANDUM IN SUPPORT to:

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