

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

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>OBJECTION TO THE COMPLETENESS OF ROCKY MOUNTAIN POWER'S FILING.</p>
---	---

Pursuant to Utah Admin. Code r.746-100, the Division of Public Utilities (“Division”) Objection to The Completeness of Rocky Mountain Power’s Filing. On February 13, 2018 the Public Service Commission of Utah (“Commission”) issued an Order Granting Motion to Vacate Remaining Schedule and Amended Scheduling Order. In that Order the Commission directed parties to file any objections to the completeness of Rocky Mountain Power’s Filing.

The Commission further noted in footnote 1 that “The sole purpose for filing such an objection should be to notify the PSC that insufficient information exists upon which to proceed with the adjudication. All arguments on the merits should be and will be preserved for hearing. If a party files an objection to the completeness of RMP’s filing, the PSC will issue a briefing

schedule to address the objection.” Therefore, the Division will only provide details on what remains incomplete in RMP’s filing.

The Company has not provided complete, updated transmission analysis supporting the Application. A critical component of the Application is the increase in east-to-west transfer capability that is enabled by the Transmission Project, because this determines the amount of incremental wind generation that can be added. The benefits from the incremental wind generation are needed to offset the costs of the Transmission Project and are a necessary component of the Company’s net benefit claims. The Company’s Second Supplemental Testimony, filed February 16, 2018, disclosed for the first time that the Company had conducted new analysis finding that the Transmission Projects would increase this transfer capability, allowing 1,510 MW of incremental wind generation in eastern Wyoming, up from the 1,270 MW assumed in the original filing. The Company did not provide the transmission study supporting this conclusion in its supplemental testimony. The Company has only provided a preliminary draft with several areas noting that additional analysis is either underway or to be completed in the future. For example, the study does not include transient stability analysis, which is critical to ensuring that the Transmission Projects are sufficient to reliably integrate the assumed wind generation. The study notes that this analysis will be provided in a follow-on technical report.

Given the importance of this analysis, the Division cannot fully evaluate the Application without complete and final studies supporting the increase in east-to-west transfer capability and enabled incremental wind capacity. For this reason the Division objects to the completeness of the filing.

Submitted this 9th day of March 2018.

/s/ Justin C. Jetter

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