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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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 JOINT MOTION TO STRIKE MOTION TO STRIKE THE SURREBUTAL TESTIMONY OF ROCKY MOUNTAIN WITNESSES AND EXPEDITED TREATMENT
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The Utah Division of Public Utilities (“Division”), Utah Industrial Energy Consumers (“UIEC”) and the Utah Association of Energy Users (“UAE”) (collectively “Moving Parties”) through their respective counsel, and pursuant to Utah Administrative Code R746-1-109 and R746-1-301, respectfully request that the Utah Public Service Commission (“PSC” or “Commission”) strike certain portions of the surrebuttal testimony of Rocky Mountain Power’s (“RMP” or “Company”) witnesses Ms. Cindy Crane, Mr. Chad Teply, Mr. Rick Vail, Mr. Rick Link, and Ms. Joelle Steward filed on May 15, 2018 (collectively “RMP’s May 15 Surrebuttal Testimony”). Moving Parties further request argument, if necessary, on this request at the start of

the hearing currently scheduled to begin on May 29, 2018. Moving Parties make these requests for the following reasons:

RMP's Surrebuttal Testimony, totaling 427 pages, modified the project (removing one of the wind projects from the resource portfolio) and presented completely revised modeling and analysis to reflect the removal of the resource, new information concerning the status of the projects, and new analysis of solar resources. In these respects, the testimony is not rebutting testimony provided by other parties, but rather is new testimony changing RMP's project and analysis of competing resource options.

RMP's Application has shifted with every filing: It first sought 860MW of new wind and transmission line that were Company owned resources and "mutually depend on one another."¹ It then proposed 1,170 MW of wind comprising Company owned wind and power purchase agreements and a transmission project that no longer was conditioned on the wind projects.

In part due to RMP's concession that the Application was shifting and incomplete, the Commission vacated the initial scheduling order.² The February 13, 2018, Order Granting Motion to Vacate Remaining Schedule and Amended Scheduling Order was premised on RMP submitting a complete application on February 16, 2018.

RMP's February 16, 2018 filing was represented as being the final project that parties could rely upon and expend resources to review. It included a certification of the completeness of its Application.³ Its February 16 filing specified certain resources and increased the new wind resource to 1,311 MW. Now, a mere two weeks from the hearing, RMP's filing changed the resources again with RMP removing one of the "selected" resources, dropping the request to 1,150

¹ Direct Testimony of Cindy Crane lines 47-48, Utah P.S.C. Docket No. 17-035-40.

² Order, Utah P.S.C. Docket No. 17-035-40 (Feb. 13, 2018).

³ Second Supplemental Direct Testimony of Rick Link lines 666-671, Utah P.S.C. Docket No. 17-035-40.

MW of new wind. RMP attempts to justify its new portfolio with new analysis. It also presented entirely new analysis in an attempt to devalue solar resources.

The change in overall project is intertwined throughout nearly all of the economic analysis presented in RMP's Surrebuttal testimony. It is practically impossible to remove the effects of the changes in resource choice from the testimony. The Moving Parties have identified the most obvious examples in testimony for example, the following references are to portions of testimony that discuss, incorporate, or rely on new information including the removal of the resource and new or updated analysis:

- Ms. Cindy Crane: Uinta removal referenced or described in lines 10, 26-30, 34-39,40-62; New solar analysis described in lines 248-264.
- Mr. Chad Teply: Uinta removal in lines 22-26, 51-54, lines 116-122, lines 122-124 (including Table 1), 139-141.
- Mr. Rick Vail: Uinta removal in lines 22-23, 45-63
- Mr. Rick Link: Uinta removal in lines 9-10, 18-19, , 29-34, 95-107, 108-112, 113-181, 192-240, 403-407, 414-419, 432-433, 984-986, 1030-1031, 1384-1386, 1390-1395, 1400-1406 (including Figure 2-SR), 1742, 1763, and 2211-2213. Solar: 25-27, 58-60, 62-72, 73-88,1853-1855, 1877-1892 (solar IE report also included as Exhibit RTL-3SR), 1893-2167, 2191-2194, 2205-2207.
- Ms. Joelle Steward: Uinta removal in lines 38-40, 274-278 (including Table 1), 300-31, JRS-1SR.

RMP's ever shifting projects, modeling methods, and analysis have prevented the Moving Parties from having meaningful opportunity to evaluate the projects at each stage. The timing of the latest changes deprive Moving Parties of the opportunity to complete a review of the new information and analysis first presented in the new testimony. Accordingly, the Moving Parties request that the Commission strike testimony related to the removal of the resource, associated

analysis, and the solar valuation method. Due to the imminent hearing, the Moving Parties respectfully request that the Commission expedite its consideration, and if necessary, conduct argument at the start of the hearing.

Counsel for UIEC has obtained permission from counsel for the Division of Public Utilities and the Utah Association of Energy Users to sign and file this Joint Motion on their behalf.

DATED this 25th day of May 2018

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CERTIFICATE OF SERVICE
(Docket No. 17-035-40)

I hereby certify that on this 25th day of May, 2018, I filed by email to psc@utah.gov the foregoing **Joint Motion to Strike Surrebutal Testimony of Rocky Mountain Witnesses and Expedited Treatment** and caused to be delivered by e-mailed, a true and correct copy to the following:

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