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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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Application of Rocky Mountain Power for	)	Docket No. 17-035-40
Approval of a Significant Energy Resource	)	
Decision and Request to Construct Wind Resource	)	Partial Joinder of Joint Motion to
and Transmission Facilities	)	Strike Surrebuttal Testimony
	)	

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Pursuant to Utah Code § 54-10a-101 and Utah Admin. Code r. 746-1, the Utah Office of Consumers Services (“Office”) hereby joins the Joint Motion to Strike The Surrebuttal Testimony of Rocky Mountain Witnesses and for Expedited Treatment filed today by the Utah Industrial Energy Consumers, the Utah Division of Public Utilities and the Utah Association of Energy Users (“Joint Motion”) to the extent that the Joint Motion seeks to strike the portions of Mr. Rick Link’s May 15, 2018 Surrebuttal Testimony that seeks to introduce new analysis on the Solar RFP, i.e. lines 25-27, 58-60, 62-72, 73-88, 1816-2253, 2263-2271 and Exhibit RTL-3SR (“Solar Testimony”). The Office takes no position on the remainder of the Joint Motion.

This portion of Mr. Link’s testimony goes beyond true surrebuttal and provides substantial new analysis based on information that Rocky Mountain Power had access to at the time when the Company filed its January 16, 2018 Supplemental Direct and Rebuttal Testimony and therefore should have been provided in earlier phases of testimony. The Office is profoundly prejudiced by the submission of this new highly technical analysis just days before

the hearing because it does not have opportunity to provide rebuttal testimony and its own analysis. This testimony is critical if not dispositive to the approval the Combined Projects given that the Office's witness Phillip Hayet's testimony establishes that in the 2050 analysis the solar projects provide greater benefits than the Combined Projects. (Hayet Second Rebuttal, lines 492-585). Moreover, given the highly technical nature of this testimony this prejudice cannot be cured by cross examination or the ability to present live testimony.

Accordingly, if the Commission denies the Joint Motion, the Office nevertheless requests that the challenged Solar Testimony be stricken from the record and Rocky Mountain Power be prohibited from raising these new arguments during the hearing.

Respectfully submitted May 25, 2018,

/s/ Robert J. Moore  
*Attorney for the Office of Consumer Services*