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November 23, 2020

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

Re: **Docket No. 17-035-61**
Application of Rocky Mountain Power to Establish Export Credits for
Customer Generated Electricity
Comments on DPU's Action Request Response

In accordance with the Notice of Comment Period issued by the Public Service Commission of Utah ("Commission") on November 18, 2020, PacifiCorp, d.b.a. Rocky Mountain Power ("the Company"), hereby submits its Comments on the Division of Public Utilities' ("DPU") Action Request Response concerning the Company's November 10, 2020 tariff compliance filing.

The DPU notes the Company's inclusion of batteries as an eligible facility in Schedule 137. The Company introduced its proposal to include batteries in Schedule 137 on lines 200-220 of the rebuttal testimony of Robert M. Meredith that was filed in this docket on July 15, 2020. The Company's proposal to include batteries was in anticipation of the new Demand Side Management Battery Demand Response Program ("Battery Program"), through Schedule 114, which was approved by the Commission on September 30, 2020 in Docket No. 20-035-T07. As stated in Mr. Meredith's testimony at the hearing in this docket, batteries should be added to the list of eligible technologies on Schedule 137, so that customer-sited storage can be interconnected efficiently and safely and to facilitate the new Battery Program.

Questions may be directed to Jana Saba, Manager, State Regulatory Affairs, at (801) 220-2823.

Sincerely,


Joelle Steward
Vice President, Regulation

cc: Service List Docket No. 17-035-61

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2020, a true and correct copy of Rocky Mountain Power's **Comments on DPU's Action Request Response** in Docket No. 17-035-61 was served by email on the following Parties:

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