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Fwd: Docket No. 17-035-68 Expedited Hearing Process/Scheduling Order for RMP Application

1 message

From: **Kimberly Ceruti** <kimberly.ceruti@ehc-usa.com>
Date: Wed, Jan 3, 2018 at 4:31 PM
Subject: Docket No. 17-035-68 Expedited Hearing Process/Scheduling Order for RMP Application
To: michaelhammer@utah.gov

Dear Atty. Michael Hammer,

On July 9, 2013, Pacificorp, dba Rocky Mountain Power ("RMP") filed four Applications with the Utah Public Service Commission ("PSC"). The RMP Applications sought PSC approval of four Power Purchase Agreements ("PPA"s), Docket Nos. 13-035-115, 13-035-116, 13-035-117 and 13-035-118.

Attached are the Scheduling Orders issued by the PSC for each docket.

The PSC issued rulings on all of RMP's Applications, two (2) on Sep.10, 2013 and two (2) on Oct. 3, 2013.

Attached are the PSC Orders for each.

At a minimum, we ask that the PSC issue a Scheduling Order for Docket 17-035-68 consistent with the timelines identified in the above dockets.

The circumstances that bring us before the PSC, at this date, however, require we request the PSC expedite the dates of the hearing process/scheduling order for Docket 17-035-68 due to a variety of complications and concerns, including the two year delay resulting from the April 25, 2014 Order issued by the PSC dismissing our complaint regarding the subject project. On July 28 2016, the Utah Supreme Court overturned the PSC's April 25, 2014 ORDER clearing the way for the PPA Application submitted by RMP.

During this delay, substantive changes that could adversely affect the subject project have occurred, such as the handling of Production Tax Credits. In addition, unlike the four (4) projects above, our project was required to execute Large Generation Interconnection Agreements in order to facilitate the PPA negotiations.

These Pacificorp Agreements have "drop dead" milestone dates that must be complied with, some as early as late June early July 2018. Other required contract terms, and **other** contracts for additional overlaying project related production and project development include financial milestones that "come due" as early as June 2018.

Thus, the overlay of contractual obligations tied to the PSC's decision that affect the Monticello Wind Farm Projects, warrants expedited treatment of the Application submitted by RMP. We respectfully request the PSC issue an expedited hearing process/scheduling order.

Thank you in advance for your time and attention to this matter.

Kind Regards,
Kimberly Ceruti

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10 attachments

-  **2013.08.06 13-035-115 Scheduling Order.pdf**
21K
-  **2013.08.06 13-035-116 Scheduling Order.pdf**
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-  **2013.07.25 13-035-117 Scheduling Order.pdf**
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-  **2013.07.25 13-035-118 Scheduling Order.pdf**
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-  **2013.10.03 13-035-115 ORDER Approving PPA Blue Mtn Power Partners.pdf**
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-  **2013.10.03 13-035-116 ORDER Approving PPA Latigo.pdf**
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-  **2013.10.03 13-035-117 ORDER Confirming PSC Sep. 10, 2013 Bench Ruling Approving PPA.pdf**
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-  **2013.10.03 13-035-118 ORDER Confirming PSC Sep. 10, 2013 Bench Ruling Approving PPA.pdf**
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-  **2014.04.25 14-035-24 ORDER Dismissing EHC Complaint.pdf**
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-  **2016.07.28 20140616 SC ORDER Reversal from Utah Supreme Court of PSC Apr. 25, 2014 ORDER.pdf**
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