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April 5, 2018

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Secretary

RE: **Docket No. 17-035-68– In the Matter of the Application of Rocky Mountain Power for Approval of Power Purchase Agreement Between PacifiCorp and Monticello Wind Farm, LLC**

Rocky Mountain Power (the “Company”) hereby submits for filing its Response to Memorandums in Opposition to Motions for Summary Judgment in the above referenced matter.

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
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By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

Joelle Steward  
Vice President, Regulation

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Attorney for Rocky Mountain Power

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Monticello Wind Farm, LLC	)	DOCKET NO. 17-035-68
	)	Rocky Mountain Power’s Response to Memorandums in Opposition to Motions for Summary Judgment
	)	
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Comes now, PacifiCorp dba Rocky Mountain Power (“Rocky Mountain Power” or “Company”), and, pursuant to Utah Admin. Code R746-1-206 and the January 5, 2018, Scheduling Order and Notice of Hearing issued by the Public Service Commission of Utah (the “Commission”) in this Docket, files its Response to the Memorandums in Opposition filed by Monticello Wind Farm, LLC and Ellis-Hall Consultants, LLC to the Motions for Summary Judgment filed by the Utah Division of Public Utilities and Utah Office of Consumer Services. In support of its Response, Rocky Mountain Power states as follows:

1. On March 9, 2018, the Utah Division of Public Utilities and Utah Office of Consumer Services each filed Motions for Summary Judgment arguing that Commission should not approve the Application for approval of the power purchase agreement between the Company and Monticello Wind Farms, LLC (the “PPA”).

2. On March 26, 2018, Monticello Wind Farms, LLC and Ellis-Hall Consultants, LLC filed Joint Memorandums in Opposition to both Motions for Summary Judgment.

3. On April 2, 2018, Monticello Wind Farms, LLC and Ellis-Hall Consultants, LLC filed a Joint Errata to the Memorandums in Opposition.

4. Rocky Mountain Power takes no legal position on the Motions for Summary Judgment and the Memorandums in Opposition thereto. There are, however, statements in the Memorandums in Opposition filed by Monticello Wind Farms, LLC and Ellis-Hall Consultants, LLC that characterize the behavior of the Company as “illegal” or purport to describe motivation and intent to actions taken by the Company, misstate legal standards and requirements, and provide an inaccurate description of the facts and circumstances that resulted in the Company’s execution of the PPA.

5. Rocky Mountain Power does not believe that any of these statements by Monticello Wind Farms, LLC and Ellis-Hall Consultants, LLC in the Memorandums in Opposition are relevant to the consideration of the power purchase agreement or motions that are before the Commission, but the Company reserves the right to rebut these statements if necessary, either through pre-filed testimony, or at hearing.

DATED this 5<sup>th</sup> day of April, 2018.

Respectfully submitted,



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Daniel E. Solander  
Attorney for Rocky Mountain Power

**CERTIFICATE OF SERVICE**

Docket No. 17-035-68

I hereby certify that on April 5, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

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**Rocky Mountain Power**

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