



Yvonne R. Hogle
Assistant General Counsel
1407 West North Temple, Suite 320
Salt Lake City, UT 84116
801.220.4050
801.220.3299 Fax

April 25, 2017

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

Attn: Gary Widerburg
Commission Secretary

**RE: Request for Extension of Advice Filing - Schedule 37
Avoided Cost Purchases from Qualifying Facilities (QF)**

In its February 12, 2009 Order in Docket No. 08-035-78 on Net Metering Service, the Public Service Commission of Utah (the "Commission") directed Rocky Mountain Power (the "Company") to calculate and file Schedule 37 avoided costs annually in order to establish the value or credit for net excess generation of large commercial customers under Schedule 135 Net Metering Service. In its November 28, 2012 Order in Docket No. 12-035-T10, the Commission directed that future annual filings should be made within 30 days of filing the Company's Integrated Resource Plan ("IRP") or IRP Update, or by April 30 of each year, whichever occurs first.

The Company hereby seeks a 30-day extension of the Company's Schedule 37 annual filing to update its methodology for Schedule 37 avoided cost pricing. The Company's 2017 IRP preferred portfolio includes cost-effective wind and solar resources, but the deficiency period avoided costs under Schedule 37 are currently based on a proxy thermal resource and are, thus, outdated. The Company proposes to update the methodology for Schedule 37 consistent with the methodology used for Schedule 38, which does account for deferral of renewable resources in the preferred portfolio. The Company needs and respectfully requests an extension of 30 days to develop and prepare the filing as proposed.

Please feel free to contact Bob Lively at 801.220.4052 or Daniel MacNeil at 503.813.5523 if you have any questions.

Sincerely,

Yvonne R. Hogle
Assistant General Counsel
Rocky Mountain Power

CERTIFICATE OF SERVICE

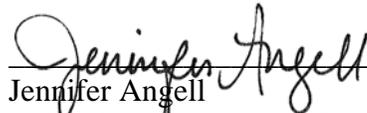
I hereby certify that on this 25th day of April 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck - mbeck@utah.gov

Division of Public Utilities

Chris Parker - ChrisParker@utah.gov


Jennifer Angell
Supervisor, Regulatory Operations