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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of Rocky Mountain Power’s Proposed Tariff Revisions to Electric Service Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities</p>	<p>DOCKET NO. 17-035-T07</p> <p>Utah Clean Energy Motion to Suspend Phase II Schedule and Consolidate with Docket No. 17-035-37</p>
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Pursuant to Utah Admin. Code R746-1-301, Utah Clean Energy hereby moves to suspend Phase II of the Schedule in Docket No. 17-035-T07 and to consolidate it with the schedule for comments or testimony in Docket No. 17-035-37 because the issues are materially similar, if not identical.

On May 30, 2017, Rocky Mountain Power (“RMP” or “the Company”) filed testimony accompanying its advice filing in Docket No. 17-035-T07 supporting changes in the Schedule 37 avoided cost pricing method in order to “update the methodology for Schedule 37 consistent with the methodology used for Schedule 38.” RMP application, page 1. On June 12, 2017, the Commission issued a schedule in Docket No. 17-035-T07 for evaluating the Company’s proposed changes to the Schedule 37 pricing method (“Phase II” issues), with direct testimony due on July 20, 2017. The Company’s proposed changes to Schedule 37 pricing include changes

to sufficiency and deficiency periods and associated avoided cost calculations, as well as REC ownership changes. *See, e.g., RMP Technical Conference Presentation*, page 10 (June 23, 2017).

On June 21, 2017, the Company filed its quarterly compliance filing in Docket No. 17-035-37 with routine and non-routine updates to avoided cost pricing for Schedule 38 qualifying facilities (“QFs”). On July 12, 2017, Utah Clean Energy and sPower each filed notice of challenge and request for scheduling conference in that docket. Utah Clean Energy and sPower provided notice of intention to challenge the Company’s changes regarding REC ownership; post-IRP resource expansion plan pricing; and IRP update changes, including sufficiency period, deficiency period, deferrable resources, and preferred portfolio. The Division of Public Utilities (“the Division”) also filed a request for a scheduling conference to address the issue of REC ownership.

The issues and pricing method changes to be addressed under Schedules 37 and 38 are materially similar. In the interests of regulatory efficiency and time management, Utah Clean Energy believes the dockets addressing Schedules 37 and 38 should be consolidated. Therefore, Utah Clean Energy respectfully requests that the Commission suspend the Phase II Schedule in Docket 17-035-T07 and consolidate it with the Schedule in Docket No. 17-035-37, which has yet to be scheduled.

Utah Clean Energy is authorized to represent that Office of Consumer Services and the Utah Association of Energy Users support this motion, and the Division does not oppose.

DATED 20th day of July, 2017.

Respectfully submitted,
Utah Clean Energy

A handwritten signature in blue ink, appearing to read "Sophie Hayes", written over a horizontal line.

/s/ _____
Sophie Hayes
Attorney for Utah Clean Energy