

Utah Clean Energy  
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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**In the Matter of Rocky Mountain Power’s  
2019 Q3 Avoided Cost Input Changes  
Quarterly Compliance Filing**

**DOCKET NO. 19-035-18  
Utah Clean Energy Notice of Challenge  
and Request for Scheduling Conference**

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On January 10, 2020, Rocky Mountain Power (the “Company”) filed its 2019 Q3 Avoided Cost Input Changes Quarterly Compliance Filing, containing routine and non-routine updates to Schedule 38 pricing. The routine updates include updates to the Official Forward Price Curve, to the Qualifying Facility Queue, to account for the extension of the Production Tax Credit, and to include 2019 IRP assumptions. The only non-routine update identified by the Company is a change to the proxy wind resource.

Utah Clean Energy respectfully requests a comment period or technical workshop in which Rocky Mountain Power can provide additional information about the avoided cost updates and answer questions from stakeholders. The prices in this update represent a significant departure from previous updates, and Utah Clean Energy does not believe that Rocky Mountain Power has adequately explained and supported the filing.

Utah Clean Energy also submits a notice of challenge to the proposed updates, pursuant to the Commission’s Order in Docket No. 14-035-140<sup>1</sup>. Proposed avoided cost price updates should not go into effect until the Division of Public Utilities and other stakeholders, including Utah Clean Energy, have had sufficient time to gather and consider information needed to

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<sup>1</sup> Docket No. 14-035-140, In the Matter of the Review of Electric Service Schedule No. 38, Qualifying Facilities Procedures, and Other Related Procedural Issues. Public Service Commission Order Approving Settlement Agreement on Schedule 38 Procedures, June 9 2015.

determine the reasonableness of the updates. UCE would like to preserve our right to challenge the following issues in the event that the comment period or technical workshop does not resolve our concerns:

- The “Utah Wind Resource Deferral” non-routine update. Utah Clean Energy believes there is insufficient information in the Company’s filing to make a determination of its reasonableness at this time.
- The impact of the 2019 IRP on the Proxy/PDDRR avoided cost method. Utah Clean Energy does not believe the Company has provided sufficient detail regarding the impact of the 2019 IRP on the avoided cost pricing method, including impact of changes to the preferred portfolio, regulation reserve requirements (integration cost), and energy storage dispatch, and the drivers behind negatively priced energy values beginning in 2024.
- Additional justification for the Company’s conclusion that tracking solar resources displace solar with storage resources from the IRP preferred portfolio.

Changes to the assumptions and inputs for the Company’s avoided cost update have resulted in a dramatic change to the Company’s proposed avoided cost price. Utah Clean Energy believes there is insufficient information in the Company’s filing to make a determination of its reasonableness at this time. We believe that further information from the Company and additional time to explore these issues is warranted.

To that end, Utah Clean Energy requests that the Commission hold a scheduling conference to set a reasonable schedule to address our challenges and request for an additional comment period or technical workshop. Utah Clean Energy appreciates the opportunity to provide feedback on the 2019 Q3 avoided cost input changes.

DATED 30<sup>th</sup> day of January, 2020.

Respectfully submitted,  
Utah Clean Energy

/s/ Kate Bowman  
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