

JUSTIN C. JETTER (#13257)
PATRICIA E. SCHMID (#4908)
Assistant Attorney Generals
Counsel for the DIVISION OF PUBLIC UTILITIES
SEAN D. REYES (#7969)
Attorney General of Utah
160 E 300 S, 5th Floor
P.O. Box 140857
Salt Lake City, UT 84114-0857
Telephone (801) 366-0335
jjetter@agutah.gov

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>Proposed Tariff Revisions to Electric Service Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities</p> <p>Rocky Mountain Power’s 2019 Avoided Cost Input Changes Quarterly Compliance Filing</p>	<p>Docket No. 20-035-T04</p> <p>Docket No. 19-035-18</p> <p>MOTION TO SUSPEND UPDATES TO SCHEDULE 37 WIND PRICING AND AMEND SCHEDULE TO ALIGN WITH DOCKET NO. 19-035-18</p>
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Pursuant to Utah Admin. Code r.746-1, the Division of Public Utilities (“Division”) files this Motion Suspend Updates to Schedule 37 Wind Pricing and Amend Schedule. The Division requests that the Public Service Commission (“Commission”) suspend the updates to the Schedule 37 wind resource pricing used for Electric Service Schedule No. 37 (“Schedule 37”) and amend the April 13, 2020 Notice of Filing and Comment Period or in the alternative issue a new scheduling order in this docket to align with the schedule in Docket No. 19-035-18.

On April 9, 2020 Rocky Mountain Power filed Advice No. 20-05, proposing revisions to Schedule 37. The filing included a similar non-routine Utah wind resource deferral update to the

avoided costs for wind generation as was included in its 2019 Q3 filing in Docket No. 19-035-18 that is under review before the Commission.¹ The Commission must address the same legal and factual questions that are before the Commission in Docket No. 19-035-18 in order to approve or deny the proposed pricing updates for Schedule 37 wind resources. Doing so in this Docket on the basis of limited comments and evidence would frustrate the purpose of the expanded review in Docket No. 19-035-18. Similarly, it is also unnecessary to provide a longer schedule in this Docket because the issues will be resolved in that Docket.

The Division is also seeking clarification from the Commission that the non-routine Utah wind resource deferral update to the avoided costs for wind generation found in the 2019 Q4 filing, which is the same non-routine update found in the 2019 Q3 filing, will also be stayed until the issues are resolved according the schedule in Docket No. 19-035-18. The 2019 Q4 filing in Docket 19-035-18 states: “[c]onsistent with the Company’s proposed nonroutine change, the wind QF resource would partially displaces [sic] summer and winter FOTs during 2020 – 2022 and the Utah wind resource in 2023.”² Implementing this non-routine update in the 2019 Q4 filing would similarly render the challenge to the non-routine update in the 2019 Q3 filing moot. For this reason, implementation of the non-routine Utah wind resource deferral update to the avoided costs for wind generation found in the 2019 Q4 filing should also be suspended until the issue is resolved in Docket No. 19-035-18.

The Utah proxy wind resource non-routine update does not affect the pricing calculations for the other Schedule 37 generation types. The Division therefore is seeking to suspend only the

¹ See Proposed Tariff Revisions to Electric Service Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities, Docket No. 20-035-T04, Direct Testimony of Daniel J. MacNeil at lines 21-26.

² See Rocky Mountain Power’s Quarterly Compliance Filing – 2019 Q4 Avoided Cost Input Changes, Docket No. 19-035-18, at page 2.

updates to Schedule 37 wind resource pricing until a final order is issued with respect to the non-routine update in Docket No. 19-035-18. The Division also requests that the Commission issue a scheduling order in this docket setting a matched schedule for comments and hearing or merging the two dockets for purposes of comments and hearing on the issue of the non-routine Utah wind proxy resource.

The Division has provided a copy of this Motion to the Office of Consumer Services, Rocky Mountain Power, and Utah Clean Energy and has been authorized to represent that each of the parties support it.

Submitted this 29th day of April 2020.

/s/ Justin C. Jetter

Justin C. Jetter
Assistant Attorney General
Utah Division of Public Utilities

CERTIFICATE OF SERVICE

I certify that on April 29, 2020, I caused a true and correct copy of the foregoing to be filed with the Public Service Commission and served by the Utah Division of Public Utilities to the following in Utah Dockets **20-035-T04 & 19-035-18** as indicated below:

BY Electronic-Mail:

Rocky Mountain Power

Jana Saba
Joelle Steward
Emily Wegener

datarequest@pacificorp.com
jana.saba@pacificorp.com
joelle.steward@pacificorp.com
emily.wegener@pacificorp.com

Utah Clean Energy

Hunter Holman
Kate Bowman

hunter@utahcleanenergy.org
kate@utahcleanenergy.org

Utah Attorney General's Office

Assistant Attorney Generals

Justin Jetter
Patricia Schmid
Robert Moore
Victor Copeland

jjetter@agutah.gov
pschmid@agutah.gov
rmoore@agutah.gov
vcopeland@agutah.gov

Office of Consumer Services

Cheryl Murray
Michelle Beck

cmurray@utah.gov
mbeck@utah.gov

/S/

Madison Galt, Legal Assistant
Utah Division of Public Utilities