

July 3, 2019

***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. 19-035-20 – In the Matter of the Application of Rocky Mountain Power for Approval of the Non-Generation and Renewable Energy Credit Supply Agreement Between PacifiCorp and Kennecott Utah Copper LLC**  
*Reply Comments*

On May 2, 2019, PacifiCorp dba Rocky Mountain Power (“Company”) filed an application with the Utah Public Service Commission (“Commission”) for approval of its Non-Generation and REC Supply Agreement (“Agreement”) with Kennecott Utah Copper LLC (“Kennecott”). The Agreement provides for, among other things, the sale of 1.5 million renewable energy certificates (“RECs”) annually, certification of those RECs under a Green-e program, payment for the RECs and the certification program, and an agreement by Kennecott to retire its Unit 4 generator.

In a scheduling order issued on May 16, 2019, the Commission set the date for comments on June 20, 2019, and reply comments on July 3, 2019. On June 10, 2019 the Division of Public Utilities (“Division”) filed initial comments in support of the Commission’s approval. On June 17, 2109, the Office of Consumer Services (“Office”) filed initial comments also in support of the Commission’s approval of the Company’s application, subject to the recommendation that the Company report on any shortfall in the 1.5 million annual RECs that the Company would otherwise sell to Kennecott under the Agreement.

The Company agrees with the Office’s recommendation and will report on any shortfall in the 1.5 million annual RECs that the Company would otherwise sell to Kennecott under the Agreement. If any shortfall occurs during the Agreement’s term the Company will provide a report to the Commission, the Division and the Office regarding such shortfall explaining how the shortfall was resolved; including the results of an RFP if issued.

The Company appreciates the opportunity to provide these reply comments in response to the comments from the Division and the Office, and again respectfully request approval of its application.

Sincerely,



Joelle Steward  
Vice President, Regulation

**CERTIFICATE OF SERVICE**

Docket No. 19-035-20

I hereby certify that on July 3, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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**Rocky Mountain Power**

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