

May 1, 2020

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: Docket No. 20-035-T04
Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 37,
Avoided Cost Purchases from Qualifying Facilities

On April 9, 2020, Rocky Mountain Power (the "Company") filed its proposed updates to Schedule 37 for qualifying facilities with the Public Service Commission ("Commission"). On April 24, 2020 the Division of Public Utilities ("DPU") filed comments recommending that the tariff be partially suspended and partially approved. While the Company generally supports the DPU's recommendation, it is filing these reply comments to clarify one point that may not have been made clear in the DPU's recommendation.

In its April 9, 2020 comments the DPU recommended "that the Commission suspend the wind prices in this Docket until after a final order in the 2019.Q3 Avoided Cost Input Changes Quarterly Compliance in Docket No. 19-035-18, but approve the prices for solar projects proposed in the application." Later in its comments the DPU states "the Division recommends the Commission approve the routine updates and the proposed prices for all qualifying Schedule 37 facilities except for wind facilities". Because the Company's proposed Schedule 37 updates includes prices for base load, wind, fixed tilt solar, and tracking solar the Company wants to note that any approval of the Commission should include approval of base load resources as well as solar. The Company supports the suspension of the updated wind pricing given the interplay between Schedule 37 and the proposed Schedule 38 non-routine update that is currently being considered by the Commission in Docket No. 19-035-18.

Beyond the above clarification, the Company has no further comments on the DPU's recommendation, other than to note that it appreciates the opportunity to provide these reply comments and DPU's attention to the requested updates. The Company looks forward to working with the DPU and other interested parties as the non-routine update to wind pricing is analyzed in Docket No. 19-035-18, which will also resolve any issues with the updated wind pricing in this docket.

Very truly yours,



Joelle Steward
Vice President, Regulation

CERTIFICATE OF SERVICE

Docket No. 20-035-T04

I hereby certify that on May 1, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Cheryl Murray cmurray@utah.gov

Michele Beck mbeck@utah.gov

Division of Public Utilities

dpudatarequest@utah.gov

Assistant Attorney General

Patricia Schmid pschmid@agutah.gov

Justin Jetter jjetter@agutah.gov

Robert Moore rmoore@agutah.gov

Victor Copeland vcopeland@agutah.gov

Rocky Mountain Power

Data Request Response Center datarequest@pacificorp.com

Jana Saba jana.saba@pacificorp.com

utahdockets@pacificorp.com



Katie Savarin
Coordinator, Regulatory Operations