



1407 W. North Temple
Salt Lake City, Utah 84116

August 31, 2021

VIA ELECTRONIC FILING

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

Attn: Gary Widerburg
Commission Administrator

Re: **Docket No. 21-035-52- Application of Rocky Mountain Power for Approval of Solicitation Process for 2022 All Source Request for Proposals**

Rocky Mountain Power (the "Company") files its Notice of Solicitation Process and Motion for Deviation from 60-Day Notice Rule regarding the Company's solicitation process for the 2022 All Source Request For Proposals.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding these filings be addressed to the following:

By E-mail (preferred) datarequest@pacificorp.com
 jana.saba@pacificorp.com
 emily.wegener@pacificorp.com

By Regular Mail Data Request Response Center
 PacifiCorp
 825 NE Multnomah, Suite 2000
 Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Very truly yours,

A handwritten signature in blue ink that reads "Joelle Steward". The signature is written in a cursive style with a large initial "J".

Joelle Steward
Vice President, Regulation

cc: Service List

Emily Wegener (12275)
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone: (801) 220-4526
Facsimile: (801) 220-3299
emily.wegener@pacificorp.com

Attorney for PacifiCorp

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF SOLICITATION PROCESS FOR 2022 ALL SOURCE REQUEST FOR PROPOSALS	Docket No. 21-035-52 NOTICE OF SOLICITATION PROCESS AND MOTION FOR DEVIATION FROM 60-DAY NOTICE RULE
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Pursuant to Utah Administrative Rule R746-420-1(3)(a) and Utah Code section 54-17-203, PacifiCorp dba Rocky Mountain Power (“RMP” or the “Company”) hereby notifies the Public Service Commission of Utah (the “Commission”) of its intent to seek approval of a solicitation process under Part 2 of the Energy Resource Procurement Act, Utah Code Ann. Title 54, Chapter 17. Pursuant to Utah Administrative Rule R746-420-1-109, the Company moves the Commission to deviate from the 60-day notice requirement of Rule R746-420-1(3)(a). The Company anticipates filing its application for approval of its all-source request for proposals (“2022 All Source RFP”) on October 20, 2021.

INFORMATION ABOUT THE 2022 ALL SOURCE RFP

The 2022 All Source RFP will solicit bids for approximately 1,345 megawatts of renewable and non-renewable resources plus approximately 600 megawatts of battery storage, all capable of delivering energy and capacity to PacifiCorp’s system for service on or before December 31, 2026.

The 2022 All Source RFP will permit qualified bidders to submit bids under power purchase agreements, build transfer agreements, and tolling agreements. The Company anticipates it will submit self-build (i.e., benchmark) bids or bids from PacifiCorp's affiliates.

MOTION TO DEVIATE FROM R746-420-1(3)(a)

The Company respectfully requests to be allowed to file the 2022 All-Source RFP on October 20, 2021, which is fifty days from the date of this filing, to ensure that selected bidders are able to enter PacifiCorp Transmission's annual cluster study by May 16, 2022. The Company will hold the pre-issuance bidders conference, as required by Rule R746-420(3)(b) in accordance with the rule.

Rule R746-420-1-109 allows the Commission to deviate from its rules when a party "demonstrate[s] that the rule imposes a hardship that outweighs the benefit(s) of the rule." The Company faces such a hardship here. The Company was unable to provide earlier notice of its intent to issue the 2022 All Source RFP because the 2021 Integrated Resource Plan ("2021 IRP") had not yet been completed. The 2021 IRP, which will be filed on September 1, 2021, identifies the need for the resources discussed above. Successful bidders to the 2022 All Source RFP may need to enter PacifiCorp Transmission's 2022 Cluster Study to receive an interconnection study and ensure that their projects can interconnect with the Company's system before the bidder's proposed commercial operation deadline.³

³ Either i) the expiration of federal tax credit on December 31, 2025 or ii) the 2022 All Source RFP's commercial operation date deadlines of December 31, 2026 for renewable resources and December 31, 2028 for long-lead resources such as nuclear or pumped hydro storage.

The window for entering the 2022 PacifiCorp Transmission Cluster Study closes on May 16, 2022. If the commission requires the full sixty (60) days prior to RFP filing in addition to another eighty (80) days to approve and record the RFP, the RFP issuance will be delayed, and therefore, successful bidders will not have been evaluated and selected in time to participate in the 2022 cluster study. If competitively priced bidders are unable to participate in the 2022 cluster study, the pool of bidders eligible for the 2022 All Source RFP could be limited to those bidders with signed large generator interconnection agreements (“LGIA”), which would result in a less robust RFP process. Further, if the bidders with executed LGIAs are not competitively priced, the Company could be forced to delay the 2022 RFP for an additional year until to accommodate the 2023 PacifiCorp Transmission Cluster Study. Such a delay could mean customers are unable to benefit from bid prices benefitting from federal tax credits as those credits are scheduled to expire at the end of 2025, resulting in higher prices. To allow for sufficient time for the Commission to evaluate and approve the 2022 All Source RFP and for the Company to issue the RFP with sufficient time to evaluate the bids prior to the close of the 2022 PacifiCorp Transmission Cluster Study Window, the Company respectfully moves the Commission to allow it to file its 2022 All Source RFP on October 20, 2021, fifty days after the filing of this notice.

DATED this 31st day of August 2021.

PACIFICORP

By: /s/ Emily Wegener

Attorney for PacifiCorp

CERTIFICATE OF SERVICE

Docket No. 21-035-52

I hereby certify that on August 31, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov
ocs@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
Emily Wegener emily.wegener@pacificorp.com


Katie Savarin
Coordinator, Regulatory Operations