

September 8, 2022

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Administrator

**Re: Docket No. 21-035-52**  
**In the Matter of Rocky Mountain Power's Application for Approval of a Solicitation**  
**Process for 2022 All Source Request for Proposals**  
*RMP Response Comments*

In accordance with Utah Admin. Code 746-1-301 PacifiCorp dba Rocky Mountain Power ("Company" or "RMP") hereby submits to the Public Service Commission of Utah its Response Comments addressing the comments filed by the Division of Public Utilities on August 29, 2022.

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

Sincerely,



Joelle Steward  
Senior Vice President, Regulation

cc: Service List Docket No. 21-035-52

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*Attorney for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<p><b>IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF SOLICITATION PROCESS FOR 2022 ALL SOURCE REQUEST FOR PROPOSALS</b></p>	<p>Docket No. 21-035-52</p> <p><b>ROCKY MOUNTAIN POWER’S RESPONSE COMMENTS REGARDING ITS MOTION FOR APPROVAL OF CHANGES TO APPENDIX O TO THE 2022 ALL SOURCE REQUEST FOR PROPOSALS</b></p>
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**I. INTRODUCTION**

In accordance with Utah Admin. Code R746-1-301, PacifiCorp d/b/a Rocky Mountain Power (“Rocky Mountain Power” or “Company”) submits these response comments to the Public Service Commission of Utah (“Commission”). The Company respectfully requests that the Commission issue an order approving the Company’s Motion for Approval of Changes to Appendix O to the 2022 All Source Request for Proposals (“2022AS RFP”), as modified to respond to the comments received from the Division of Public Utilities (“DPU” or “Division”).

## **II. BACKGROUND**

The Company's Motion requests that the Commission approve a revised Appendix O to the 2022AS RFP, which contains a list of the benchmark resources. The Company's Motion also requests the ability to subtract resources from the Amended Appendix O without Commission approval.

On August 29, 2022, the DPU filed comments stating they do not object to the requests in the Company's Motion on the condition that potential bidders, who are not party to this docket, be given notice and an opportunity to respond to the Motion. DPU further advocates for a requirement that the Company post any removal of resources from Appendix O to this docket and notify potential bidders of the changes via email.

## **III. RESPONSE**

The Company agrees to file a notice in this docket if resources are removed from the benchmark resource list in Appendix O. The Company notes that the notice, if necessary, would likely be filed close to the November 21, 2022 deadline since resources can appear to be falling through but then quickly revived due to changing factors.

The Company requests that the Commission decline to follow DPU's recommendation to extend the time to respond to the Company's Motion to permit potential bidders to weigh in. Such an extension is unprecedented and unnecessary. Potential bidders are sophisticated parties who should be aware of this proceeding. The Company's Motion is publicly available. Therefore, there is no need to offer potential bidders an additional opportunity to respond. Moreover, potential bidders are not party to this proceeding. The purpose of this proceeding is to ensure a fair, competitive bid process to achieve the least cost for customers. These purposes would not be advanced by allowing non-party potential bidders to weigh in on whether the Company should be allowed to amend Appendix O.

The Company also respectfully requests that the Commission decline to require the Company to send notifications to potential bidders through the “transmission mailing list” referenced by the DPU. Changes to Appendix O are unlikely to have any effect, positive or negative, on the price that potential bidders submit to the 2022AS RFP. Potential bidders who are interested in the status of this public regulatory proceeding are free to monitor the docket for any changes. Additionally, as part of the 2022AS RFP, the Company maintains a website that provides information about any changes or updates to the RFP, where the updated Appendix O has already been posted in redline. Potential bidders are not parties, notification would not improve the results of the 2022AS RFP, and, in any event, potential bidders have already been notified of changes through the Company’s 2022AS RFP website. Therefore, introducing additional notification requirements is not warranted. Instead of being required to send an email to the mailing list, the Company has already updated its RFP website with a redline version of Appendix O with a note that states the change is pending the Public Service Commission of Utah approval and commits to further updates should there be any further changes to Appendix O.

### **III. CONCLUSION**

PacifiCorp respectfully requests that the Commission issue an order approving the Motion, consistent with these reply comments.

DATED this 8th day of September, 2022.

Respectfully submitted,

ROCKY MOUNTAIN POWER



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**CERTIFICATE OF SERVICE**

Docket No. 21-035-52

I hereby certify that on September 8, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

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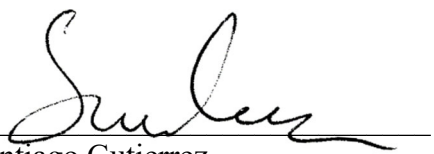
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