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November 9, 2023

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
PacifiCorp's Response to Motion for Order to Preserve Records

Rocky Mountain Power, a division of PacifiCorp, pursuant to the Public Service Commission Administrative Procedures Act Rule, R746-1-301, hereby files its Response to the Motion for Order to Preserve Records filed by the Division of Public Utilities in this matter on October 26, 2023.

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 fluid and cursive.

Joelle Steward
Senior Vice President, Regulation and Customer/Community Solutions

cc: Service List

CERTIFICATE OF SERVICE

Docket No. 21-035-52

I hereby certify that on November 9, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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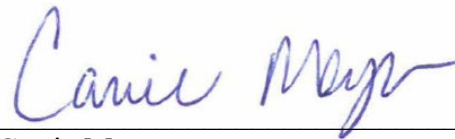
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Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of a Solicitation Process for 2022 All Source Request for Proposals	Docket No. 21-035-52 RESPONSE TO MOTION FOR ORDER TO PRESERVE RECORDS
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Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or the “Company”), pursuant to the Public Service Commission Administrative Procedures Act Rule, R746-1-301, hereby responds to the Motion for Order to Preserve Records filed by the Division of Public Utilities (“Division”) October 26, 2023 (“DPU Motion”). In support of its Response, the Company states as follows:

1. On April 22, 2022, the Public Service Commission of Utah (“Commission”) issued an order approving the solicitation process.
2. On April 29, 2022, PacifiCorp issued its 2022AS RFP to the market to solicit bids for resources that could interconnect or deliver with PacifiCorp’s transmission system and achieve a commercial operation date by December 31, 2027.¹
3. Benchmark bids were received on December 9, 2022, and market bids were received March 14, 2023.

¹ The 2022AS RFP indicated PacifiCorp’s preference for bids that could come online by the end of 2025 or during 2026, but also stated it would consider bids for long-lead time resources so long as commercial operation could be achieved by December 31, 2028.

4. On September 15 and 29, 2023, PacifiCorp filed notices informing the Commission and interested parties that its 2022AS RFP would be suspended to adapt to changing conditions while making critical decisions for the long-term benefit of its system.

5. On October 26, 2023, the Division filed the DPU Motion requesting the Commission issue an order requiring PacifiCorp to preserve all records related to bids the Company received in response to the 2022AS RFP, which the Division stated would “encompass any information that the Company would use to evaluate bids, determine a final shortlist, or otherwise determine which acquisitions are prudent, including: third-party bids; benchmark bids; resource commercial operation dates; prices; resource types; resource operating characteristics such as expected energy, supply curves, and capacity; bid terms; company communication with bidders; and internal information and communication regarding bids.”²

6. On November 3, 2023, the Office of Consumer Services filed a response in support of the DPU Motion.


7. The Company has no objection to preserving all records related to the 2022 AS RFP and, accordingly, supports the DPU Motion.

WHEREFORE, based on the foregoing, the Company respectfully requests the Commission issue an order approving the DPU Motion.

DATED this 9th day of November, 2023.

RESPECTFULLY SUBMITTED,

ROCKY MOUNTAIN POWER



Carla Scarsella
Deputy General Counsel

² Motion for Order to Preserve Records at 3.