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*Attorneys for US Magnesium LLC*

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of US Magnesium, LLC for Determination of Long-Term Rates, and Terms and Conditions of Interruptible/DSM Electric Service Between It and Rocky Mountain Power	DOCKET NO. 21-035-53
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**STIPULATED MOTION FOR EXTENSION  
AND REQUEST FOR EXPEDITED TREATMENT**

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Pursuant to Utah Admin Code R746-1, US Magnesium, LLC (“USMag”), Rocky Mountain Power (“RMP”), the Division of Public Utilities (“Division”) and the Office of Consumer Services (“Office”) file this stipulated motion for extension of case deadlines. USMag and RMP are engaged in meaningful settlement negotiations that may result in a settlement of the disputes in this Docket. Those negotiations will not be complete before the current surrebuttal deadline set forth in the Court’s October 13, 2021 Scheduling Order in this docket. All parties to this Stipulation believe that it would be preferable for USMag and RMP to reach a negotiated stipulation of their disputes rather than to engage in a contested hearing on those disputes. As such, and to facilitate further negotiations on a negotiated resolution, the parties respectfully request that the Commission revise the current Scheduling Order as follows:

### Surrebuttal Testimony

The current deadline for parties to file Surrebuttal testimony is May 20, 2022. The parties request that the Commission set a new deadline of June 17, 2022 for the parties to either file Surrebuttal testimony that responds to Rebuttal testimony filed on May 6, 2022 or to file testimony related to a settlement stipulation if one can be reached between now and that date.

### Phase 2 Hearing

The Scheduling Order sets May 25-26, 2022 as the Phase 2 Hearing in this matter. The parties request that the Commission set a new Phase 2 Hearing in this matter for June 22-23, 2022. On those dates, the parties will either hold a contested hearing or address a settlement stipulation if a negotiated resolution to this matter can be reached in the interim. The parties request that the Commission hold the current May 25, 2022 hearing date to address a separate stipulation, as set forth below.

### Hearing on Stipulation for Extension of Existing Agreements

Pursuant to a stipulation between the parties dated October 14, 2021, and an order of this Commission dated December 1, 2021, the current Electric Service Agreement (ESA) and Operating Reserve Interruption Agreement (ORIA) between USMag and RMP expires on June 30, 2022. To facilitate the above-referenced negotiations, USMag and RMP have entered into a further extension of the current ESA and ORIA to extend the terms of those agreements through July 31, 2022. If a settlement agreement can be reached between the parties, the terms of the new agreement would go into effect on July 1, 2022 and will replace the current agreement. The parties will present a stipulation to the extension of the current agreement to the Commission and request that the Commission address that Stipulation on May 25, 2022—the date currently set for the Phase 2 hearing.

Revision of Current Schedule

The Stipulated Motion before the Commission would revise the schedule as follows:

<b>Current Schedule</b>	<b>Date</b>
Surrebuttal Testimony	May 20, 2022
Phase 2 Hearing	May 25-26, 2022

<b>Revised Schedule</b>	<b>Date</b>
Hearing on Extension of ESA/ORIA	May 25, 2022
Surrebuttal or Stipulation Testimony	June 17, 2022
Phase 2 (or Stipulation) Hearing	June 22-23, 2022

Request for Expedited Treatment

The current May 20, 2022 deadline for filing surrebuttal testimony is fast approaching. As such, the parties respectfully request that the Commission address this stipulated motion on an expedited basis. A proposed order approved by all parties is submitted along with this Stipulated Motion for the Commission's convenience.

Respectfully submitted this 18th day of May 2022.

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ROCKY MOUNTAIN POWER

/s/ *Emily Wegener*

Emily Wegener  
Senior Attorney, PacifiCorp

US MAGNESIUM, LLC



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James Dodge Russell & Stephens, P.C.

UTAH DIVISION OF PUBLIC UTILITIES

/s/ *Patricia Schmid*

Patricia Schmid  
Assistant Attorney General

UTAH OFFICE OF CONSUMER SERVICES

/s/ *Robert Moore*

Robert Moore  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of May 2022, I served a true and correct copy of the foregoing via electronic mail to the following:

**ROCKY MOUNTAIN POWER**

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*Priscilla J. Russell*

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