

June 6, 2022

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

Re: Docket No. 22-035-30 – In the Matter of the Application of Rocky Mountain Power for Approval of an Amendment of a Renewable Energy Service Contract Between Rocky Mountain Power and Stadion LLC

Rocky Mountain Power (the “Company”) hereby submits for electronic filing an Application for Approval of an Amendment to the Renewable Energy Service Contract between the Company and Stadion LLC. The Company’s Application is supported by Confidential Direct Testimony of Mr. Craig M. Eller along with Confidential Exhibit RMP__(CME-1), Confidential Exhibit RMP__(CME-2) and one public workpaper.

Confidential information is provided in subject to R746-1-601–606 of the Utah Public Service Commission Rules.

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
utahdockets@pacificorp.com
jana.saba@pacificorp.com
emily.wegener@pacificorp.com
stephanie.barber-renteria@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Utah Public Service Commission

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

Sincerely,

A handwritten signature in blue ink that reads "Joelle Steward". The signature is written in a cursive, flowing style.

Joelle Steward

Senior Vice President, Regulation and Customer & Community Solutions

Enclosures

CC: Service List

Emily Wegener (12275)
Stephanie Barber-Renteria (8808)
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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 Third Amendment to Renewable Energy Service Contract between Rocky Mountain Power and Stadion LLC)	Docket No. 22-035-30
)	APPLICATION
)	
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Rocky Mountain Power, a division of PacifiCorp, (“Rocky Mountain Power” or the “Company”), hereby submits this application (“Application”) for an order from the Public Service Commission of Utah (“Commission”) approving the Third Amendment to the Renewable Energy Service Contract (“RESC Amendment”) between the Company and Stadion LLC (“Stadion”), dated effective March 28, 2022. With this Application, the Company also provides notice of an amendment to the Appaloosa Solar I-B Renewable Resource Appendix (“Resource Appendix Amendment”), which has been made for consistency with the RESC Amendment.

In support of this Application, the Company states as follows:

1. Rocky Mountain Power is an unincorporated division of PacifiCorp, an Oregon corporation, that provides electric service to customers in the states of Utah, Wyoming, and

Idaho. The Company is a public utility in the state of Utah and is subject to the jurisdiction of the Commission with respect to its rates and service.

2. Communications regarding this Application should be sent to:

Jana Saba
Utah Regulatory Affairs Manager
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, UT 84116
Email: jana.saba@pacificorp.com

Emily L. Wegener
Stephanie Barber-Renteria
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
E-mail: emily.wegener@pacificorp.com
stephanie.barber-renteria@pacificorp.com

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah St, Suite 2000
Portland, Oregon 97232

Informal inquiries related to this Application may be directed to Jana Saba, Utah Regulatory Affairs Manager, at (801) 220-2823.

BACKGROUND

3. Electric Service Schedule No. 34 Renewable Energy Purchases for Qualified Customers – 5,000 kW and Over (“Schedule 34”) allows customers within Rocky Mountain Power’s service territory who meet the tariff’s requirements to enter into a contract with the

Company under which the Company will purchase renewable energy on behalf of the customer. Schedule 34 contracts are subject to Commission approval.

4. Effective June 20, 2016, pursuant to the provisions of Schedule 34, Rocky Mountain Power and Facebook, Inc. (“Facebook” or “Customer”) entered into the Renewable Energy Service Contract (“RESC”). The Commission approved the RESC by Order Memorializing Bench Ruling Approving Renewable Energy Service Contract with Facebook (“Order”), dated August 29, 2016, in Docket No. 16-035-27.

5. The purpose of the RESC is to allow Customer to meet its goal of having 100 percent of the electric energy serving its Utah facilities generated by renewable energy. Because Customer’s goal could not be accomplished all at once, the RESC allows for the flexibility of a ramp-up period, during which time the Company will enter into agreements to procure renewable resources for Customer, while the Company serves Customer under Electric Service Schedule No. 9.

6. The RESC provides that the process by which the Company will procure renewable resources on behalf of Customer is through a separate agreement, the Renewable Resource Appendix, the form of which is attached to the RESC as Exhibit E.

7. The parties executed two amendments to the RESC, both of which extended the date for notice by Customer of its commitment to develop its Utah facilities. The amendments were dated February 24, 2017, and February 22, 2018, respectively. The Company filed notice of the amendments with the Commission on August 8, 2018.

8. On October 23, 2018, by that certain Assignment and Assumption of Renewable Energy Service Contract (“Assignment”), Facebook, as the original identified

Customer under the RESC, assigned all its rights under the RESC to Stadion LLC (“Stadion”). Following the Assignment, for all purposes, Stadion is now Customer.

9. Since the RESC was executed, the Company and Customer have entered into six Renewable Resource Appendix agreements for the Company to procure renewable energy on behalf of Customer, and the Company entered into corresponding power purchase agreements (“PPAs”) with resource providers. In correspondence dated September 9, 2019, August 13, 2020, and June 30, 2021, the Company provided courtesy notice to the Commission of all PPAs it executed on behalf of Customer.

RESC AMENDMENT

10. On March 28, 2022, the Company and Customer executed the RESC Amendment, which is described in the testimony of Mr. Craig M. Eller, and which is attached to Mr. Eller’s testimony as Confidential Exhibit RMP__(CME-1).

11. With the RESC Amendment, the parties made the following changes to the RESC:

- a. Added a limitation to the capacity contribution that will be allocated to resources procured in the future on Customer’s behalf.
- b. Included a calculation for transmission line losses in the measurement of the estimated renewable supply for future resources.
- c. Modified the calculation of the renewable supply charge to be on a calendar-year basis, rather than a contract-year basis, with an annual true-up adjustment.
- d. Revised the early termination payment calculation.

- e. Redefined the Administrative Fee and Use of System Facilities Charge and added a new System Facilities Capital Charge and a new Additional Capacity Charge.

12. The details of the provisions in the RESC Amendment are fully set forth in Mr. Eller's testimony.

RESOURCE APPENDIX AMENDMENT

13. On April 4, 2022, the Company and Customer executed the Resource Appendix Amendment.

14. The Resource Appendix Amendment revises the Appaloosa I-B Renewable Resource Appendix so its terms are consistent with the RESC Amendment. With this Application, the Company provides the Commission notice of the RESC Amendment.

CONCLUSION

15. The terms of the RESC Amendment are just and reasonable and in the public interest.

16. The Company seeks the Commission's approval of the RESC Amendment and acknowledgement of the notice of the Resource Appendix Amendment, and respectfully requests that the Commission hold a scheduling conference to establish a procedural schedule as soon as possible so that interested parties may comment on the Application.

WHEREFORE, the Company respectfully requests that the Commission issue an order by September 30, 2022, that:

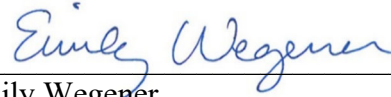
- a. finds that the terms and conditions of the RESC Amendment are just, reasonable and in the public interest,
- b. approves the RESC Amendment, and

c. acknowledges the notice of the Resource Appendix Amendment.

DATED this 6th day of June 2022.

Respectfully submitted,

ROCKY MOUNTAIN POWER



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CERTIFICATE OF SERVICE

Docket No. 22-035-30

I hereby certify that on June 6, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

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Division of Public Utilities

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Jennifer Angell
Regulatory Project Manager