



State of Utah

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Public Service Commission

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JOHN S. HARVEY, Ph.D.
Commissioner

April 30, 2024

Joelle Steward
Rocky Mountain Power
1407 W. North Temple, Ste. 330
Salt Lake City, Utah 84116

Re: *Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities; Docket No. 24-035-T04*

Dear Ms. Steward,

The Public Service Commission (PSC) reviewed your letter, dated April 26, 2024 ("Letter"), requesting the PSC extend the deadline for Rocky Mountain Power (RMP) to file its annual update concerning avoided costs for Electric Service Schedule No. 37 ("Schedule 37 Update"). Your Letter notes that RMP's avoided cost methodology has switched recently from GRID to the PLEXOS model and represents RMP has been working with diligence to incorporate the preferred portfolio reflected in RMP's 2023 IRP Update into avoided cost calculations under the PLEXOS model. The Letter represents these calculations have taken longer than RMP anticipated, and RMP will be unable to file its Schedule 37 Update by April 30, 2024. You further represent RMP does not have avoided cost results using the GRID model that incorporate the 2023 IRP Update and preparing such results would require significant time and resources.

The Letter asks the PSC extend the deadline for this year's Schedule 37 Update to May 15, 2024, to allow RMP sufficient time to prepare the most accurate filing possible, using PLEXOS and incorporating the 2023 IRP Update. As an alternative, the Letter offers to file tariff sheets that reflect the avoided cost pricing from RMP's March 26, 2024, filing in Docket No. 23-035-28, which does not incorporate the 2023 IRP Update.

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The PSC recognizes extenuating circumstances exist, given RMP's recent change from GRID to PLEXOS and the substantial changes the 2023 IRP Update made to the preferred portfolio identified in the 2023 IRP. The PSC further recognizes avoided cost pricing that incorporates the 2023 IRP Update is more likely to provide an accurate reflection of avoided costs than pricing calculated based on the preferred portfolio identified in the 2023 IRP.

Accordingly, the PSC grants RMP's request for a brief extension to file its Schedule 37 Update and directs RMP to file it on or before May 15, 2024.

Sincerely,

/s/ Gary L. Widerburg
PSC Secretary
DW#333583