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January 26, 2018

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. 17-035-40

Application for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of Resource Decision

In accordance with Utah Admin. Code R746-1-301(2), PacifiCorp d/b/a Rocky Mountain Power (“Rocky Mountain Power” or “Company”) hereby submits reply comments to the Utah Industrial Customers’ Memorandum in Support of Motion to Vacate Remaining Schedule and Request for Expedited Treatment and the Utah Association of Energy Users’ Comments in Support of Motion to Vacate Schedule, both filed on January 24, 2018.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

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By regular mail: Data Request Response Center
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Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

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Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of:</p> <p>THE APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF A SIGNIFICANT ENERGY RESOURCE DECISION AND VOLUNTARY REQUEST FOR APPROVAL OF RESOURCE DECISION</p>	<p>Docket No. 17-035-40</p> <p>ROCKY MOUNTAIN POWER’S REPLY TO UAE’S AND UIEC’S SUPPORT FOR MOTION TO VACATE SCHEDULE</p>
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In accordance with Utah Admin. Code R746-1-301(2), PacifiCorp d/b/a Rocky Mountain Power (“Rocky Mountain Power” or “Company”) submits this Reply to the Utah Industrial Customers’ (“UIEC”) Memorandum in Support of Motion to Vacate Remaining Schedule and Request for Expedited Treatment (“UIEC Memorandum”) and the Utah Association of Energy Users’ (“UAE”) Comments in Support of Motion to Vacate Schedule (“UAE Comments”), both filed on January 24, 2018.

UIEC and UAE argue that the Company's filing is incomplete and does not include all the information required by Utah Admin. Code R746-1-430-2.¹ To the contrary, as described in Attachment A to this reply,² the Company's supplemental direct testimony filed on January 16, 2018, together with the direct testimony filed on June 30, 2017, contains substantially all of the information required by the Commission's rules. Indeed, the only information that is outstanding relates to the 2017R request for proposal ("RFP") solicitation process.³ The Company will submit that information as available once interconnection studies for the 2017R RFP final shortlist projects are completed and the 2017R RFP has concluded. This is consistent with past requests for approval of a significant energy resource decision where the Company made supplemental filings related to the underlying RFP as that information became available.⁴

Since filing its response to the Motion to Vacate Schedule on January 25, 2018, Rocky Mountain Power has continued to work with the parties to establish a revised procedural schedule. The Company's proposed schedule provides additional time to review the 2017R RFP results, while preserving a target decision date that allows the Company to secure production tax credits from new wind facilities. The Company respectfully requests that the Commission deny the motion to vacate the schedule, set a new hearing date to begin either April 16, 2018 or April 24, 2018, reset the target decision date to June 1, 2018, and direct the parties to present a schedule with other necessary, mutually-agreeable milestones.

¹ UIEC Memorandum at 2; UAE Comments at 2.

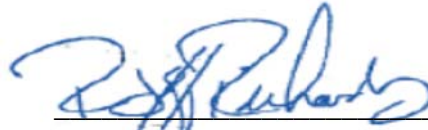
² Attachment A to this reply updates Attachment A to the Application for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of Resource Decision filed by the Company on June 30, 2017.

³ See Utah Admin. Code R746-1-430-2(c) (describing information related to the solicitation process that must be included with a request for approval of a significant energy resource decision).

⁴ See *In the Matter of the Application of Rocky Mountain Power for Approval of a Significant Energy Resource Decision Resulting from the All Source Request for Proposals*, Docket No. 10-035-126 (where the IE report and copies of the complete solicitation were filed after the application for approval).

DATED this 26th day of January, 2018.

Respectfully submitted,



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ATTACHMENT A

R746-430-2(a)-(i) Information Location Matrix for Wind Facilities

Paragraph	Filing Requirement	Testimony and Exhibits
(a)	Information to demonstrate the utility has complied with the requirements of the Energy Resource Procurement Act and Commission rules	<ol style="list-style-type: none"> 1. <i>Prefiling Public Notice of Intent to File a Voluntary Request for Approval of Significant Energy Resource Decision</i>, filed June 23, 2017; 2. Link Direct and Supplemental Direct and Rebuttal Testimony; 3. Tetry Direct and Supplemental Direct and Rebuttal Testimony.
(b)	Information to demonstrate whether approval of the selected Significant Energy Resource is in the public interest	<ol style="list-style-type: none"> 1. Link Direct and Supplemental Direct and Rebuttal Testimony; 2. Tetry Direct and Supplemental Direct and Rebuttal Testimony.
(c)	<p>Information regarding the solicitation process, if the Significant Energy Resource was solicited through a solicitation process, including, but not limited to:</p> <ol style="list-style-type: none"> (i) Summaries of all bids received; (ii) Summaries of the Affected Utility's rankings and evaluations of bids; (iii) Copies of all reports relating to the solicitation process made by an independent evaluator who may have been involved with the solicitation process; (iv) A copy of the complete Commission approved Solicitation with appendices, attachments and drafts, if applicable; and (v) A signed acknowledgment from a utility officer involved in the solicitation that to the best of his or her knowledge, the utility fully observed and complied with the requirements of the Commission's rules or statutes applicable to the solicitation process 	<ol style="list-style-type: none"> 1. Link Supplemental Direct and Rebuttal Testimony; 2. The bid summaries and rankings are highly confidential and commercially sensitive and are therefore available for review at the Company's offices; 3. The IE has yet to complete its final report, but that report will be filed when received by the Company; 4. The complete Commission-approved solicitation, with appendices, attachments, and drafts, will be filed once the 2017R RFP has concluded (the information is currently available at the following: http://www.pacificorp.com/sup/rfps/2017-rfp.html) ; and 5. The signed acknowledgment will be filed once the 2017R RFP has concluded.

(d)	Identification of all information, data, models and analyses used by the Affected Utility to evaluate the acquisition of the Significant Energy Resource if the acquisition is pursuant to Section 54-17-201(3), or to evaluate and rank bids and the selected resource, if the acquisition is by a solicitation process pursuant to Section 54-17-201(2)	1. Link Direct and Supplemental Direct and Rebuttal Testimony.
(e)	Contracts proposed for execution or use in connection with the acquisition of the Significant Energy Resource and identification of matters for which contracts are being negotiated or remain to be negotiated	1. Teply Direct, Supplemental Direct and Rebuttal Testimony. .
(f)	Information on the estimated costs for the Significant Energy Resource, including but not limited to engineering studies, data, and models used in the analysis, and any other costs which the utility considers recoverable pursuant to Section 54-17-303;	1. Teply Direct and Supplemental Direct and Rebuttal Testimony; 2. Link Direct and Supplemental Direct and Rebuttal Testimony; and 3. Larsen Direct Testimony and Steward Supplemental Direct and Rebuttal Testimony.
(g)	An analysis of the estimated effects the Significant Energy Resource will have on the Affected Utility's revenue requirement	1. Link Direct and Supplemental Direct and Rebuttal Testimony; and 2. Larsen Direct Testimony and Steward Supplemental Direct and Rebuttal Testimony.
(h)	Financial information demonstrating adequate financial capability to obtain the Significant Energy Resource pursuant to the proposed acquisition	Crane Direct Testimony
(i)	Identification of all other relevant information in support of the requested approval	1. Crane Direct and Supplemental Direct and Rebuttal Testimony; 2. Teply Direct and Supplemental Direct and Rebuttal Testimony; 3. Vail Direct and Supplemental Direct and Rebuttal Testimony; 4. Link Direct and Supplemental Direct and Rebuttal Testimony; and 5. Larsen Direct Testimony and Steward Supplemental Direct and Rebuttal Testimony.

R746-440-1(1)(a)-(k) Information Location Matrix for Transmission Facilities

Paragraph	Filing Requirement	Testimony and Exhibits
(a)	A description of the Resource decision	Vail Direct and Supplemental Direct and Rebuttal Testimony.
(b)	Information to demonstrate that the Energy utility has complied with the applicable requirements of the Act and Commission rules	1. <i>Prefiling Public Notice of Intent to File a Voluntary Request for Approval of Significant Energy Resource Decision</i> , filed June 23, 2017; 2. Vail Direct and Supplemental Direct and Rebuttal Testimony; 3. Link Direct and Supplemental Direct and Rebuttal Testimony; and 4. Larsen Direct Testimony and Steward Supplemental Direct and Rebuttal Testimony.
(c)	The purposes and reasons for the Resource decision	Vail Direct and Supplemental Direct and Rebuttal Testimony.
(d)	An analysis of the estimated or projected costs of the Resource decision, including the engineering studies, data, information and models used in the Energy utility's analysis	1. Vail Direct and Supplemental Direct and Rebuttal Testimony; and 2. Link Direct and Supplemental Direct and Rebuttal Testimony.
(e)	Descriptions and comparisons of other resources or alternatives evaluated or considered by the Energy utility, in lieu of the proposed Resource decision	Link Direct and Supplemental Direct and Rebuttal Testimony.
(f)	Sufficient data, information, spreadsheets, and models to permit an analysis and verification of the conclusions reached and models used by the Energy utility	Link Direct and Supplemental Direct and Rebuttal Testimony.
(g)	An analysis of the estimated effect of the Resource decision on the Energy utility's revenue requirement	1. Link Direct and Supplemental Direct and Rebuttal Testimony; and 5. Larsen Direct Testimony and Steward Supplemental Direct and Rebuttal Testimony.
(h)	Financial information demonstrating adequate financial capability to implement the Resource decision	Crane Direct Testimony.
(i)	Major contracts, if any, proposed for execution or use in connection with the Resource decision	Vail Direct and Supplemental Direct and Rebuttal Testimony.

(j)	Information to show that the Energy utility has or will obtain any required authorization from the appropriate governmental bodies for the Resource decision	Vail Direct and Supplemental Direct and Rebuttal Testimony.
(k)	Other information as the Commission may require	No other information has currently been requested.

CERTIFICATE OF SERVICE

Docket No. 17-035-40

I hereby certify that on January 26, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

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