

August 31, 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**  
*Compliance Filing*

In accordance with the order issued by the Public Service Commission of Utah (“Commission”) June 22, 2018, in the above-referenced docket (“Order”), Rocky Mountain Power (“Company”) submits a compliance filing presenting its proposed reporting requirements.

**Background**

In Section 3.e. of the Order, the Commission conditioned its approval for the new wind and transmission projects (“Combined Projects”) on the Company filing a report with the following information (“Required Information”):

- (i) final project costs for each specific project that comprises the Wind Projects and the Transmission Projects;
- (ii) realized PTC benefits from the Combined Projects;
- (iii) realized energy benefits from the Combined Projects;
- (iv) transmission costs of the Transmission Projects that are actually offset by revenues derived from wholesale transmission customers;
- (v) payments for any damages, including liquidated damages, paid to PacifiCorp related to the Combined Projects;
- (vi) contribution to the 230 kV Network Upgrades’ total cost from interconnection customers;
- (vii) annual revenue requirement associated with the Aeolus to Bridger/Anticline Line and the incremental transmission revenue resulting from the construction of the line;
- (viii) wind operations and maintenance costs associated with the Wind Projects that PacifiCorp owns;
- (ix) realized value of RECs sold associated with the generation from the Wind Projects;

- and  
 (x) other information PacifiCorp deems necessary or appropriate.

Specifically, the Order requires the Company to propose a reporting system that includes the start date, frequency, duration, level of granularity and confidentiality of the Required Information by September 1, 2018.

### Proposed Reporting System

Table 1 below summarizes the Company’s proposed reporting system for the Required Information along with the additional details requested by the Commission (start date, frequency, duration, and confidentiality), with the proposed level of granularity shown in Attachment A. The Company’s general proposal is described below, and any items that vary from the general proposal are identified and explained.

Table 1 Proposed Reporting Requirements of the Combine Projects (Docket No. 17-035-40)				
Required Information	Start Date	Frequency	Duration	Confidentiality
(i) final project costs for each specific project	12 ME CY 2020, due 4/30/2021	annually	3 years	First Report - Conf All subsequent reports - non-Conf
(ii) realized PTC benefits	12 ME CY 2020, due 4/30/2021	annually	3 years	Non-confidential
(iii) realized energy benefits	12 ME CY 2020, due 4/30/2021	annually	3 years	Non-confidential
(iv) transmission costs of the Transmission Projects that are actually offset by revenues derived from wholesale transmission customers	12 ME CY 2020, due 4/30/2022	annually	2 years	Non-confidential
(v) payments for any damages, including liquidated damages	Included in annual reports, as applicable	annually	3 years	Confidential
(vi) contribution to the 230 kV Network Upgrades’ total cost from interconnection customers	12 ME CY 2020, due 4/30/2022	annually	2 years	Non-confidential
(vii) annual revenue requirement associated with the Aeolus to Bridger/Anticline Line and the incremental transmission revenue resulting from the construction of the line	12 ME CY 2020, due 4/30/2022	annually	2 years	Non-confidential
(viii) wind operations and maintenance costs associated with the Wind Projects that PacifiCorp owns	12 ME CY 2020, due 4/30/2021	annually	3 years	Non-confidential
(ix) realized value of RECs sold	12 ME CY 2020, due 4/30/2021	annually	3 years	Confidential

#### *Start Date*

As described in the Company’s filing in Docket No. 17-035-40, the Combined Projects are scheduled to be online by the end of 2020. Therefore, the Company proposes that its first report reflect the applicable Required Information, as of December 31, 2020. The Company proposes a due date for the annual calendar year report, of April 30 of the following year. The first report would be filed on or before April 30, 2021, and would include all of the calendar year 2020 Required Information, except:

- **(iv) transmission costs of the Transmission Projects that are actually offset by revenues derived from wholesale transmission customers; (vi) contribution to the 230 kV Network Upgrades’ total cost from interconnection customers; and (vii) annual revenue requirement associated with the Aeolus to Bridger/Anticline**

**Line and the incremental transmission revenue resulting from the construction of the line**

- The reason for the exception is because meaningful information would not be available until the projects approved in this docket are placed into service, energized, and FERC formula rates are updated using actual data. Each May 15, as part of the annual update of PacifiCorp's FERC-approved transmission formula rate, PacifiCorp calculates a true-up rate for the prior calendar year and a projected rate for June of the current year through May of the following year that includes a limited forecast of transmission capital. PacifiCorp proposes to begin its reporting using actual data used in the calculation of true-up rates after the projects approved in this docket are in service and energized. Thus, PacifiCorp's first report including these items would be in April 2022, incorporating data from the 2020 true-up rate calculated in May 2021.
- **(v) payments for any damages, including liquidated damages**
  - This information would be included if applicable.

The Company also notes that for the first filed report, the amounts related to the final project costs for each specific project will be mostly known at the time of the filing, but some true-ups could occur in the final close out and transfer process that could change the final amounts. Any amounts that change from the first report filed will be identified.

*Frequency and Duration of Reports*

The Company recommends reports be filed annually for a total of three years. After the third report is filed, it could then be determined if additional reports are needed. Under this proposal the reports filed would be:

- 12 months ended CY December 2020, filed April 30, 2021 ("First Report")
- 12 months ended CY December 2021, filed April 30, 2022 ("Second Report")
- 12 months ended CY December 2022, filed April 30, 2023 ("Third Report")

*Level of Granularity*

For the majority of the Required Information, the Company recommends reporting the information on a project-level basis. To illustrate the level of granularity proposed, Attachment A shows the level of detail for the Required Information along with the format used to report the information. The Company proposes to use Attachment A as a template to prepare the reports.

*Confidentiality*

At this time, the Company anticipates that the majority of the report will contain information that is non-confidential with the exception of the following items:

- **(i) final project costs for each specific project**
  - This information will be confidential (in the First Report only) because the information would still be considered proprietary to the Company's vendors at the time.

- **(v) payments for any damages, including liquidated damages**
  - Any liquidated damages amounts received by the Company would be considered confidential.
- **(ix) realized value of RECs sold**
  - The company maintains its individual facility REC volume, price, and revenue on a confidential basis to protect individual project performance data and not influence market conditions.

It is possible that at the time the reports are filed, additional information will be identified as confidential that was not contemplated at the time of this compliance filing. If additional information is marked confidential, the Company will provide justification for that treatment.

The Company appreciates the opportunity to present its proposed reporting requirements and looks forward to working with parties and the Commission.

Rocky Mountain Power 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](mailto:datarequest@pacificorp.com)  
[jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)

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

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

Sincerely,



Joelle Steward  
Vice President, Regulation

**Docket No. 17-035-40**

**Attachment A**

**Proposed Reporting System for the Combined Projects**

**August 31, 2018**

**Final Project Costs**  
**12 Months Ended December 31, 20XX**

<b>Project</b>	<b>Final Project Cost:</b>	<b>Note:</b>
Cedar Springs (BTA)*	-	Comparable to amount in Confidential Exhibit RMP_(RTL-1SS) cell F9
Ekola Flats	-	Comparable to amount in Confidential Exhibit RMP_(RTL-1SS) cell F10
TB Flats	-	Comparable to amount in Confidential Exhibit RMP_(RTL-1SS) cell F11
230kv Network Upgrades	-	Comparable to amount May 15, 2018 Surrebuttal Testimony of Rick A. Vail at page 3, line 6:
Aeolus to Bridger/Anticline Line	-	Comparable to amount in Confidential Exhibit RMP_(RTL-1SS) cell C55

\*The purchased power agreement portion of the Cedar Springs project would be reflected in the Energy Benefits (NPC)

**Production Tax Credit Benefits**  
**12 Months Ended December 31, 20XX**

<b>Project</b>	<b>KWh Generation</b>	<b>Expiration</b>	<b>Factor (inflated tax per unit)</b>	<b>Federal Income Tax Credit</b>
Cedar Springs (BTA)	-	xx/xx/20xx	0.024	-
Ekola Flats	-	xx/xx/20xx	0.024	-
TB Flats	-	xx/xx/20xx	0.024	-
<b>Total Federal Renewable Energy Tax Credit</b>	<b>-</b>			<b>-</b>

**Energy Benefits (NPC)**  
**12 Months Ended December 31, 20XX**

**Cedar Springs (BTA)**

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	Heavy Load Hour (HLH) Incremental Generation (MWh)	HLH Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	HLH Energy Benefits (a) x ((b) - (c)) (\$1,000)	Light Load Hour (LLH) Incremental Generation (MWh)	LHL Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	LLH Energy Benefits (e) x ((f) - (g)) (\$1,000)	Total Energy Benefits (d) + (h) (\$1,000)
Nov-20				-				-	-
Dec-20				-				-	-
	12 Months Ended December 31, 2020			-	12 Months Ended December 31, 2020			-	-
Jan-21				-				-	-
Feb-21				-				-	-
Mar-21				-				-	-
Apr-21				-				-	-
May-21				-				-	-
Jun-21				-				-	-
Jul-21				-				-	-
Aug-21				-				-	-
Sep-21				-				-	-
Oct-21				-				-	-
Nov-21				-				-	-
Dec-21				-				-	-
	12 Months Ended December 31, 2021			-	12 Months Ended December 31, 2021			-	-
Jan-22				-				-	-
Feb-22				-				-	-
Mar-22				-				-	-
Apr-22				-				-	-
May-22				-				-	-
Jun-22				-				-	-
Jul-22				-				-	-
Aug-22				-				-	-
Sep-22				-				-	-
Oct-22				-				-	-
Nov-22				-				-	-
Dec-22				-				-	-
	12 Months Ended December 31, 2022			-	12 Months Ended December 31, 2022			-	-
Jan-23				-				-	-
Feb-23				-				-	-
Mar-23				-				-	-
Apr-23				-				-	-
May-23				-				-	-
Jun-23				-				-	-
Jul-23				-				-	-
Aug-23				-				-	-
Sep-23				-				-	-
Oct-23				-				-	-
Nov-23				-				-	-
Dec-23				-				-	-
	12 Months Ended December 31, 2023			-	12 Months Ended December 31, 2023			-	-

*Incremental Generation = Wind Plant Generation MWh – Base Wind Plant Generation MWh*  
*NPC Incremental Savings*  

$$= [Incremental Gen_{HLH} \times (Monthly Market Price_{HLH} - Integration Costs)] + [Incremental Gen_{LLH} \times (Monthly Market Price_{LLH} - Integration Costs)]$$
*NPC Benefit = NPC Incremental Savings × EBA Sharing Band, if applicable*

Where:

*Incremental Generation = The increase in generation at the wind plants due to the Wind Projects*  
*Wind Plant Generation MWh = The wind plant generation associated with the Wind Projects*  
*Base Wind Plant Generation MWh = The wind plant generation associated with the Wind Projects that is included in base rates.*  
*Incremental Gen<sub>HLH</sub> = The increase in generation at the wind plant due to the Wind Projects during heavy load hours*  
*Incremental Gen<sub>LLH</sub> = The increase in generation at the wind plant due to Wind Projects during light load hours*  
*Monthly Market Price<sub>HLH</sub> = Heavy load hour monthly market price*  
*Monthly Market Price<sub>LLH</sub> = Light load hour monthly market price*  
*Integration Costs = Wind integration costs from the most recent IRP*



**Ekola Flats**

	(a) Heavy Load Hour (HLH) Incremental Generation (MWh)	(b) HLH Monthly Market Price (\$/MWh)	(c) Integration Cost (\$/MWh)	(d) HLH Energy Benefits (a) x ((b) - (c)) (\$1,000)	(e) Light Load Hour (LLH) Incremental Generation (MWh)	(f) LHL Monthly Market Price (\$/MWh)	(g) Integration Cost (\$/MWh)	(h) LLH Energy Benefits (e) x ((f) - (g)) (\$1,000)	(i) Total Energy Benefits (d) + (h) (\$1,000)
Nov-20				-				-	-
Dec-20				-				-	-
	12 Months Ended December 31, 2020			-	12 Months Ended December 31, 2020			-	-
Jan-21				-				-	-
Feb-21				-				-	-
Mar-21				-				-	-
Apr-21				-				-	-
May-21				-				-	-
Jun-21				-				-	-
Jul-21				-				-	-
Aug-21				-				-	-
Sep-21				-				-	-
Oct-21				-				-	-
Nov-21				-				-	-
Dec-21				-				-	-
	12 Months Ended December 31, 2021			-	12 Months Ended December 31, 2021			-	-
Jan-22				-				-	-
Feb-22				-				-	-
Mar-22				-				-	-
Apr-22				-				-	-
May-22				-				-	-
Jun-22				-				-	-
Jul-22				-				-	-
Aug-22				-				-	-
Sep-22				-				-	-
Oct-22				-				-	-
Nov-22				-				-	-
Dec-22				-				-	-
	12 Months Ended December 31, 2022			-	12 Months Ended December 31, 2022			-	-
Jan-23				-				-	-
Feb-23				-				-	-
Mar-23				-				-	-
Apr-23				-				-	-
May-23				-				-	-
Jun-23				-				-	-
Jul-23				-				-	-
Aug-23				-				-	-
Sep-23				-				-	-
Oct-23				-				-	-
Nov-23				-				-	-
Dec-23				-				-	-
	12 Months Ended December 31, 2023			-	12 Months Ended December 31, 2023			-	-

**TB Flats**

	(a) Heavy Load Hour (HLH) Incremental Generation (MWh)	(b) HLH Monthly Market Price (\$/MWh)	(c) Integration Cost (\$/MWh)	(d) HLH Energy Benefits (a) x ((b) - (c)) (\$1,000)	(e) Light Load Hour (LLH) Incremental Generation (MWh)	(f) LHL Monthly Market Price (\$/MWh)	(g) Integration Cost (\$/MWh)	(h) LLH Energy Benefits (e) x ((f) - (g)) (\$1,000)	(i) Total Energy Benefits (d) + (h) (\$1,000)
Nov-20				-				-	-
Dec-20				-				-	-
	12 Months Ended December 31, 2020			-	12 Months Ended December 31, 2020			-	-
Jan-21				-				-	-
Feb-21				-				-	-
Mar-21				-				-	-
Apr-21				-				-	-
May-21				-				-	-
Jun-21				-				-	-
Jul-21				-				-	-
Aug-21				-				-	-
Sep-21				-				-	-
Oct-21				-				-	-
Nov-21				-				-	-
Dec-21				-				-	-
	12 Months Ended December 31, 2021			-	12 Months Ended December 31, 2021			-	-
Jan-22				-				-	-
Feb-22				-				-	-
Mar-22				-				-	-
Apr-22				-				-	-
May-22				-				-	-
Jun-22				-				-	-
Jul-22				-				-	-
Aug-22				-				-	-
Sep-22				-				-	-
Oct-22				-				-	-
Nov-22				-				-	-
Dec-22				-				-	-
	12 Months Ended December 31, 2022			-	12 Months Ended December 31, 2022			-	-
Jan-23				-				-	-
Feb-23				-				-	-
Mar-23				-				-	-
Apr-23				-				-	-
May-23				-				-	-
Jun-23				-				-	-
Jul-23				-				-	-
Aug-23				-				-	-
Sep-23				-				-	-
Oct-23				-				-	-
Nov-23				-				-	-
Dec-23				-				-	-
	12 Months Ended December 31, 2023			-	12 Months Ended December 31, 2023			-	-

**Transmission Costs**  
**12 Months Ended December 31, 20XX**

Line	Description/Source	Calculation	CY 20XX
1	<b>Annual Transmission Revenue Requirement:</b> Formula rate Appendix A, Line 169 (Net Zonal Revenue Req.)		-
2	<b>12 CP Monthly Peak (MW):</b> Formula rate Appendix A, Line 170		-
3	<b>Rate (\$/MW-year)</b>	[Line 1 / Line 2]	-
4	(\$/MW-month)	[Line 3 / 12]	-
5	<b>Total PacifiCorp ESM Network Load volume plus Behind-The-Meter:</b> Formula rate Attachment 9b, cols. 'e' and 'Behind-the-Meter'		-
6	<b>Total Revenue from PacifiCorp ESM Network Load</b>	[Line 5 x Line 4]	-
7	As percent of all network and long-term point-to-point	[Line 6 / Line 1]	0.0%
8	<b>PacifiCorp ESM long-term point-to-point volume:</b> Formula rate Attachment 9b, column 'g1'		-
9	<b>Loss rate:</b> PacifiCorp OATT Schedule 10		0.00%
10	<b>PacifiCorp ESM long-term point-to-point volume with losses:</b>	[Line 8 x (1 + Line 9)]	-
11	<b>Total Revenue from PacifiCorp ESM long-term point-to-point (with losses)</b>	[Line 10 x Line 4]	-
12	As percent of all network and long-term point-to-point	[Line 11 / Line 1]	0.0%
13	ESM network and LT PTP as percent of total network and LT PTP	[Line 7 + Line 12]	0.0%
14	<b>Percentage of revenues from third party wholesale transmission customers</b>	[1 - Line 13]	<b>0.0%</b>

Adapted from the attachment included in PacifiCorp's response to data request DPU 11.6 in Docket No. 17-035-40. Formula rate references refer to the true-up.

**Liquidated Damages**  
**12 Months Ended December 31, 20XX**

<b>Resource</b>	<b>FERC Account</b>	<b>Liquidated Damages (\$)</b>
<b>TOTAL</b>		

**230 kV Network Upgrades**  
**12 Months Ended December 31, 20XX**

**Project**

Material	\$	-
Internal Labor	\$	-
External Contract Services	\$	-
Other	\$	-
Capital Surcharge	\$	-
AFUDC	\$	-
<b>TOTAL</b>	<b>\$</b>	<b>-</b>

Annual Revenue Requirement - Aeolus to Bridger/Anticline Line and Incremental Transmission Revenue  
12 Months Ended December 31, 20XX

Line No.	Reference	(a) (b) (c) (d)				(e) (f) (g) (h)				(i) (j) (k) (l)				(m) (n) (o) (p)				
		2020 Energy Gateway				2021 Energy Gateway				2022 Energy Gateway				2023 Energy Gateway				
		Total Company	Factor	Factor %	Utah Allocated	Total Company	Factor	Factor %	Utah Allocated	Total Company	Factor	Factor %	Utah Allocated	Total Company	Factor	Factor %	Utah Allocated	
<b>\$-Thousands</b>																		
<b>Plant Revenue Requirement</b>																		
1	Capital Investment	Footnote 1	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	
2	Depreciation Reserve	Footnote 1	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	
3	Accumulated DIT Balance	Footnote 1	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	
4	Net Rate Base	sum of lines 1-3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Pre-Tax Rate of Return	line 29	0.000%	-	0.000%	0.000%	-	0.000%	-	0.000%	-	0.000%	-	0.000%	-	0.000%	-	
6	Pre-Tax Return on Rate Base	line 4 * line 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Wholesale Wheeling Revenue	Footnote 2	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
8	Operation & Maintenance		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
9	Depreciation		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
10	Property Taxes	line 30 * prev. yr-end net plant	-	GPS	0.0000%	-	-	GPS	0.0000%	-	-	GPS	0.0000%	-	-	GPS	0.0000%	-
11	Wind Tax		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
12	<b>Total Plant Revenue Requirement</b>	sum of lines 6-11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
<b>Net Power Cost</b>																		
13	NPC Incremental Savings		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
<b>PTC Benefit</b>																		
14	PTC Benefit		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	(88,062)	SG	0.0000%	-
15	PTC Benefit in Base Rates		-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-	-	SG	0.0000%	-
16	Net PTC		-	-	-	-	-	-	-	-	-	-	-	(88,062)	-	-	-	
17	Gross- up for taxes	line 16 * (line 28 - 1)	-	-	-	-	-	-	-	-	-	-	-	88,062	-	-	-	
18	PTC Revenue Requirement	sum of lines 16 and 17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	<b>Rev. Requirement</b>	sum of lines 12, 13, 18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
<b>Adjustment for EBA Pass-through</b>																		
20	Wholesale Wheeling Revenue	line 7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
21	Percentage included in EBA (100%)	UT EBA Sharing %	-	-	100%	-	-	-	100%	-	-	-	-	100%	-	-	100%	
22	EBA Pass-through	line 20 * line 21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	NPC Incremental Savings	line 13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Percentage included in EBA (100%)	UT EBA Sharing %	-	-	100%	-	-	-	100%	-	-	-	-	100%	-	-	100%	
25	EBA Pass-through	line 23 * line 24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	<b>Rev. Reqt. after EBA Pass-through</b>	line 19 - line 22 - line 25	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Federal/State Combined Tax Rate		0.000%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Net to Gross Bump up Factor = (1/(1-tax rate))		0.0000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Pretax Return		0.000%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Property Tax Rate		0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Utah SG Factor		0.0000%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Utah GPS Factor		0.0000%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Footnotes:  
1) Average Balances  
2) Wholesale Wheeling Revenue = percentage of third-party transmission revenues from tab (iv) Transmission Costs, line 14 \* Aeolus to Bridger/Anticline line revenue requirement

**Wind O&M Costs for PacifiCorp Owned Projects  
12 Months Ended December 31, 20XX**

<b>Resource</b>	<b>Total O&amp;M</b>
Cedar Springs (BTA)	
Ekola Flats	
TB Flats	
<b>TOTAL</b>	

**REC Revenue from Wind Projects**  
**12 Months Ended December 31, 20XX**

<b>Resource</b>	<b># sold</b>	<b>Vintage</b>	<b>Price</b>	<b>Revenue</b>
Cedar Springs (BTA)				
Ekola Flats				
TB Flats				
<b>TOTAL</b>				



**CERTIFICATE OF SERVICE**

Docket No. 17-035-40

I hereby certify that on August 31, 2018, 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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