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Attorneys for Rocky Mountain Power

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF ROCKY MOUNTAIN POWER FOR)	
APPROVAL OF SCHEDULE 37 STANDARD)	Docket No. 20000-518-EA-17
RATES FOR PURCHASES OF POWER FROM)	(Record No. 14736)
QUALIFYING FACILITIES)	

**ROCKY MOUNTAIN POWER’S SUMMARY OF REMAINING ISSUES OF FACT AND
LAW**

Comes now, Rocky Mountain Power (the “Company”), by and through its counsel, and hereby files its Summary of Remaining Issues of Fact and Law for Determination by the Commission, in accordance with Paragraph 5(b) of the Scheduling Order, issued by the Wyoming Public Service Commission (“Commission”) on August 31, 2017.

1. The Company’s position is set forth in its Application, the pre-filed direct testimony and exhibits of Mr. Daniel J. MacNeil, Resource and Commercial Strategy Advisor, the proposed tariffs included with the Application, and the rebuttal testimony filed by Mr. MacNeil. The Company believes that the remaining issue for the Commission to determine is whether the Company’s proposed update to Schedule 37, Avoided Cost Purchases from Qualifying Facilities, as described in the Application and supporting testimony is just, reasonable, and in the public interest.

2. The Company believes that the proposed changes to Schedule 37 as contained in the Application are in compliance with Chapter 3, Section 35 of the Commission’s Rules;

specifically Chapter 3, Section 35(c)(i), which requires system data from which avoided costs may be derived to be filed not less often than every two years.

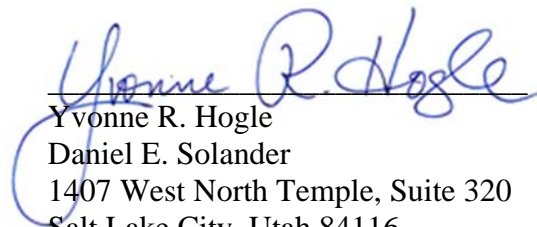
3. The Company is not proposing a change to its Commission-approved avoided cost methodology.

4. The direct testimony and exhibits of Mr. MacNeil, and his rebuttal testimony adequately support and explain the Application and the Company's proposals therein.

5. Adoption of the proposed tariff changes set forth in the Application and as described in the testimony of Mr. MacNeil would be just, reasonable and in the public interest.

6. The Company responds, in general, to other parties' issues with the Company's Application in its Updated Summary of Contentions, filed simultaneously herewith.

Respectfully submitted this 18th day of December 2017.


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CERTIFICATE OF SERVICE

Docket No. 20000-518-EA-17

I hereby certify that on this 18th day of December, 2017, I caused to be served via E-mail, a true and correct copy of Rocky Mountain Power's **Summary of Remaining Issues of Fact and Law** to the following:

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