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Attorneys for Utah Red Hills Renewable Park, LLC

Submitted February 7, 2014

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Power Purchase Agreement Between PacifiCorp and Utah Red Hills Renewable Park, LLC)	Docket No. 13-035-197
)	COMMENTS OF UTAH RED HILLS RENEWABLE PARK, LLC
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Pursuant to the scheduling order issued by the Commission on December 19, 2013, Utah Red Hills Renewable Park, LLC (“Red Hills”) submits its Comments in this proceeding seeking Commission approval of a power purchase agreement (“PPA”) between Rocky Mountain Power and Red Hills.

BACKGROUND

Red Hills has been in the process of developing a solar-powered electric generation project in Iron County, Utah (the “Red Hills Project”) since 2007. Red Hills has expended significant resources on project-development activities by, among other things, participating in pro-

ceedings before this Commission.

Rocky Mountain Power is a “purchasing utility” under Utah Code Ann. § 54-12-2, and the Red Hills Project is a “qualifying facility” under the terms of the Public Utility Regulatory Policies Act of 1978, Utah Code Ann. § 54-12-1 *et seq.* and related Commission orders. Red Hills and Rocky Mountain Power have negotiated a PPA for the purchase and sale of electric power from the Red Hills Project. Red Hills also has two interconnection queue positions for delivering power to Rocky Mountain Power’s transmission system.

On December 10, 2013, Rocky Mountain Power submitted an application for Commission approval of the PPA between Rocky Mountain Power and Red Hills in connection with the Red Hills Project.

THE APPROVAL PROCESS

PPA approval procedure before the Commission is set forth under the terms of the Commission’s prior orders and Rocky Mountain Power’s applicable tariff provisions.

Pursuant to the procedures set forth in Electric Service Schedule No. 38 of Rocky Mountain Power Company’s P.S.C.U. Tariff No. 49, Red Hills negotiated and executed a PPA, dated December 5, 2013, with Rocky Mountain Power under Part I of that Schedule. The purchase prices set forth in the PPA were calculated using the Commission-approved methodology approved in Docket No. 12-035-100. Rocky Mountain Power represented that the PPA conforms to the requirements established by the Commission in Docket No. 12-035-100 for avoided-cost PPAs with a qualifying-facility project.¹

With respect to interconnection, Red Hills has two queue positions with Rocky Mountain Power for 40 MW ac each (queue #324 and #525). Red Hills anticipates combining both queue

¹Dkt. No. 13-035-197, Rocky Mountain Power App. ¶ 5.

positions into its existing interconnection agreement, if possible, and expects to finalize its interconnection agreement or agreements within the next several weeks. Rocky Mountain Power has affirmed that the Red Hills project will be “fully integrated with the Rocky Mountain Power system.”²

The parties have satisfied the relevant requirements of Schedule No. 38 and complied with existing Commission orders and guidance.

WHEREFORE, Utah Red Hills Renewable Park, LLC respectfully urges the Commission to issue its order approving the Utah Red Hills – Rocky Mountain Power PPA under § I.B.7 of Schedule No. 38.

RESPECTFULLY SUBMITTED this 7th day of February 2014.

Ballard Spahr LLP

/s/ Theresa A. Foxley

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²*Id.* ¶ 6.

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of February, 2014, an original and ten (10) true and correct copies of the foregoing **COMMENTS OF UTAH RED HILLS RENEWABLE**

PARK, LLC were hand-delivered to:

Gary L. Widerburg
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, UT 84111
psc@utah.gov
Rocky Mountain Power:

and true and correct copies were electronically mailed to the addresses below:

Data Request Response Center	datarequest@pacificorp.com
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/s/ Theresa A. Foxley _____