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Attorneys for Renewable Energy Coalition

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION)	
OF ROCKY MOUNTAIN POWER FOR)	
MODIFICATION OF CONTRACT TERM)	Docket No. 20000-481-EA-15
OF PURPA POWER PURCHASE)	(Record No. 14220)
AGREEMENTS WITH QUALIFYING)	
FACILITIES)	

**RENEWABLE ENERGY COALITION'S
SUMMARY OF ISSUES**

Renewable Energy Coalition, pursuant to Section 113 of the Rules of the Wyoming Public Service Commission ("PSC" or "Commission"), and the PSC's October 22, 2015 "Scheduling Order," hereby respectfully files this Summary of Factual and Legal Issues in the above-captioned matter. The issues remaining to be decided in this matter are specifically summarized in the Renewable Energy Coalition's Summary of Contentions and include:

1. Whether QFs have a right to enter into long-term contracts?

2. Whether Rocky Mountain Power's proposal to lower contract terms to three years would prevent Wyoming QFs from entering into long-term contracts?

3. Whether QFs have a right to be paid for the capacity they provide to the utility that purchases their power?

4. Whether contract terms shorter than Rocky Mountain Power's resource sufficiency period would prevent some QFs from being paid for capacity?

5. Whether contract terms shorter than Rocky Mountain Power's twenty-year planning horizon would prevent QFs from receiving capacity payments for the full value of the resources they cause Rocky Mountain Power to avoid?

6. Whether Rocky Mountain Power's current methodology for paying existing QFs should be revised so that QFs entering into contract renewals should be paid for capacity during all contract years?

7. Whether QFs have a right to a minimum contract term that is sufficient to allow both new and existing QFs an ability to obtain financing and continue to operate?

8. Whether Rocky Mountain Power's three-year contract terms will prevent economic new and existing QFs from obtaining financing and operating?

9. If the Commission lowers contract terms, whether baseload hydro and existing QFs should be excluded from any contract term changes, if any.

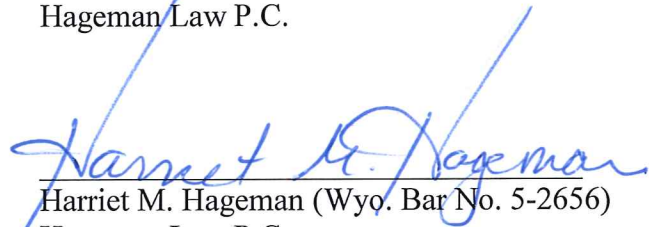
10. Whether three year contact terms will harm QFs and ratepayers by increasing risks and costs, providing Rocky Mountain Power with another opportunity to raise obstacles to shut down existing projects, and harm QFs ability to make long-term plans that rely upon stable prices necessary for all aspects of operations?

11. Whether three-year contract terms are consistent with the Public Utility

Regulatory Policies Act, the Federal Energy Regulatory Commission's regulations and policies,
Wyoming law, and the WPSC policies?

Dated this 4th day of March, 2015.

Respectfully Submitted
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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2016 an original and seven (7) copies of the foregoing **RENEWABLE ENERGY COALITION'S SUMMARY OF ISSUES**, along with an electronic version, were filed with the Wyoming Public Service Commission, and a true and correct copy was sent via electronic mail addressed to the following:

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