

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

**IN THE MATTER OF THE APPLICATION)
OF ROCKY MOUNTAIN POWER FOR)
APPROVAL OF SCHEDULE 37 STANDARD)
RATES FOR PURCHASES OF POWER)
FROM QUALIFYING FACILITIES)**

**DOCKET NO. 20000-518-EA-17
(Record No. 14736)**

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

The Renewable Energy Coalition (the “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 Rocky Mountain Power’s Schedule 37 eligibility should be expanded to remove the capacity factor limitation for standard prices up to 10 MW?
2. Whether Rocky Mountain Power’s Schedule 37 limit stating that published prices are only available until 10 MW of system resources are acquired should be removed?
3. Whether Rocky Mountain Power’s Schedule 37 infringes on qualifying facilities’ right to establish a legally enforceable obligation?
4. Whether there is an adequate basis for a separate renewable avoided cost rate?
5. Whether Rocky Mountain Power should offer a separate renewable and non-renewable avoided cost price streams?
6. Whether Rocky Mountain Power’s Wyoming wind resource is a deferrable resource, and whether it should be included in the current avoided cost calculations.

Respectfully submitted this 18th day of December, 2017.



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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of December, 2017 an original and seven copies of the foregoing **SUMMARY OF ISSUES** was e-filed with the Wyoming Public Service Commission and a copy was served via electronic mail addressed to the following:

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