

The Commission issued an interlocutory order on September 1, 2020. The order directed the Company to file the amended PPA by September 15, 2020. The Commission also granted persons until September 22, 2020 to file written comments on the amended PPA and set a September 29, 2020 reply comment deadline for the Company. Order No. 34768.

The Company did not file the amended PPA until November 3, 2020, because amending the PPA took longer than the Company initially expected.

STAFF ANALYSIS

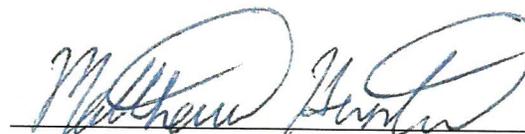
In its comments filed on August 10, 2020, Staff recommended the parties file an amended PPA that includes the following updates: (1) update Exhibit A to include correct monthly estimate information; (2) incorporate the 82.4% discount for purposes of converting firm market prices to non-firm market prices throughout the PPA; and (3) correct mistakes and errors in Exhibit K.

Staff reviewed the amended PPA and believes that it has incorporated the recommendations made by Staff in its comments filed on August 10, 2020.

STAFF RECOMMENDATION

Staff recommends approval of the amended PPA between Rocky Mountain Power and Birch Hydro Company. Staff also recommends that the Commission declare that the avoided cost rates set forth in the amended PPA are just and reasonable, in the public interest, and that the Company's incurrence of such costs are legitimate expenses.

Respectfully submitted this 3rd day of December 2020.



Matt Hunter
Deputy Attorney General

Technical Staff: Yao Yin

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 3RD DAY OF DECEMBER 2020, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF TO AMENDED APPLICATION**, IN CASE NO. PAC-E-20-07, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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SECRETARY