

December 7, 2016

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

**RE: In the Matter of Potential Amendments to R746-100-3
In the Matter of Potential Amendments to Utah Administrative Code R746-100**

Dear Mr. Widerburg:

Pursuant to Request for Final Comments Regarding Proposed Rule R746-100 issued on November 8, 2016, in the above-referenced matter, PacifiCorp dba Rocky Mountain Power (the "Company") submits the following comments.

- The Company requests that the Commission's proposed SFTP server be set up to provide a confirmation of receipt with a time and date stamp to confirm that filing has taken place.
- The Company requests that confidential and highly confidential documents be encrypted at all times, including during transfer to the SFTP server, while stored on the SFTP server, during transfer from the SFTP server to the internal server, and while stored on the internal server as the Company has discussed in further detail with the Utah Department of Technology Services.

The Company further requests that the the R746-100 Clean Version included with the November 8, 2016 Request for Final Comments be changed as follows.

- Modify lines 148-149 to read:
 - (a) Be presented as a functional and searchable electronic portable document file (pdf), word processing or spreadsheet document.

- Modify lines 155-156 to read:

(c) be identified by an electronic file name that includes the following information or an abbreviation thereof, as applicable, in the following order.

- Add the following to R746-1-203:

(6) If the Commission's SFTP server is unable to receive documents at any time on the due date, the Commission will declare the SFTP server to be in technical failure. If a party is prevented from E-filing a document on its due date because of a technical failure, the document will be considered timely filed if it is filed by 5:00 p.m. on the next business day.

- Modify line 300 to read:

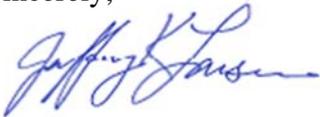
(a) placing the information on a document with a yellow background, and clearly designate the confidential information (e.g., by highlighting text with no more than twenty percent grey shading, outlining the confidential information in a box or border, or setting the text off with asterisks) highlighting the information in yellow;

- Modify line 325 to read:

(i) place the information on a document with a pink background, and clearly designate the highly confidential information (e.g., by highlighting text with no more than twenty percent grey shading, outlining the confidential information in a box or border, or setting the text off with asterisks) highlight the information in pink;

Please contact me if you have any questions concerning the forgoing.

Sincerely,



Jeffrey K. Larsen
Vice President, Regulation

CERTIFICATE OF SERVICE
Docket No. 16-R100-01

I hereby certify that on this 7th day December 2016, a true and correct copy of Rocky Mountain Power's Comments was served upon the following persons via electronic mail at the email addresses shown below:

OFFICE OF CONSUMER SERVICES

Michele Beck – mbeck@utah.gov

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UTAH DIVISION OF PUBLIC UTILITIES

Erika Tedder – etedder@utah.gov

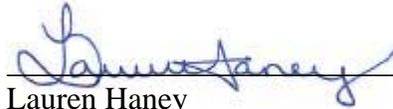
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Lauren Haney

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