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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Acknowledgment of PacifiCorp Integrated Resource Plan 2007))))))	DOCKET NO. 07-2035-01 RESPONSE AND OBJECTION
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**RESPONSE AND OBJECTION TO UTAH COMMITTEE
OF CONSUMER SERVICES' REQUEST FOR HEARING
OR IN THE ALTERNATIVE TO REOPEN DOCKET FOR COMMENTS**

PacifiCorp, by and through its Rocky Mountain Power division (referred to herein as "Rocky Mountain Power" or the "Company"), hereby responds to the Utah Committee of Consumer Services' request for hearing or, in the alternative, to reopen the docket for comments that was filed with the Public Service Commission of Utah (the "Commission") January 2, 2008.

1. The Utah Committee of Consumer Services' ("Committee") request for hearing or, in the alternative, request to reopen the docket for comments should be denied because, despite the Committee's contentions, no interested party has been prejudiced by the Company's filings, the Commission is under no obligation to conduct a hearing on the Company's 2007 Integrated Resource Plan ("2007 IRP"), and the best use of administrative resources does not support the Committee's request.

2. Rocky Mountain Power filed a request January 17, 2007 with the Commission requesting an extension of time to file its 2007 Integrated Resource Plan (“2007 IRP”). The Company then filed its 2007 IRP with the Commission May 31, 2007.

3. The Commission issued an order June 4, 2007 requesting interested parties to file comments prior to July 27, 2007, which was later extended to August 31, 2007.

4. The Committee asserts that the Company filed “supplemental information and additional support” for its 2007 IRP and that interested parties did not have an opportunity to comment upon the utility’s additional and new information. This is not entirely true. While the Company did file supplemental information with the Commission September 27, 2007, the information was actually provided to all the interested parties August 9, 2007, three weeks prior to when their comments were due. (*See Attachment A.*) As such, parties had sufficient time to review and comment on the supplemental information that was filed by the Company September 27, 2007.

5. Furthermore, the Company did not file new information October 17, 2007 in support of its 2007 IRP, as alleged by the Committee. Rather, the Company simply responded to the various comments that had been filed with the Commission by interested parties in response to the Company’s 2007 IRP. The response consisted of no new substantive information, but instead, summarized the interested parties’ comments and presented argument by the Company as to why the comments were not sufficient to deter the Commission from acknowledging the 2007 IRP.

6. The Committee’s reliance upon Utah Code §63-46b-8 and Utah Administrative Rule R746-100-10 for purposes of requesting a hearing or, in the alternative, to reopen the docket for additional comments is misplaced. Utah Code §63-46b-8 and R746-100-10 pertain to

hearing procedures, inter alia, conduct of the hearing, receipt of evidence, exhibits, cross-examination, etc., and do not specifically provide the Commission authority to grant a request for hearing. Furthermore, the Commission's Standards and Guidelines for Integrated Resource Planning that are set forth in the Commission's Report and Order June 18, 1992 in Docket No. 90-2035-01 does not require the Commission to conduct a hearing on Rocky Mountain Power's 2007 IRP. Furthermore, the Committee contends that the rationale for the Questar report and order equally applies to Rocky Mountain Power's 2007 IRP, yet the Commission never held a hearing on the Questar integrated resource plan or prolonged the issuance of the order by entertaining an open ended request for additional comments. Accordingly, contrary to the committee's assertions, a hearing on the 2007 IRP is not required or necessary for the Commission to render a decision on the 2007 IRP.

7. Rocky Mountain Power filed its 2007 IRP in accordance with the Commission's standards and guidelines. It did not request a hearing at the time of filing, it does not believe a hearing is necessary or required, as the Commission's standards and guidelines do not require a hearing, and the Company submits that a hearing would not be an efficient use of administrative resources.

8. The reality is the Company is presently working on an update to its 2007 IRP and its 2008 integrated resource plan filing. If the Commission grants the Committee's request, this proceeding will likely be prolonged an additional 3-6 months, if not longer. Soliciting additional comments from parties and/or holding a formal adjudicative hearing on the 2007 IRP that will be supplemented and superseded with the update to the 2007 IRP and the 2008 integrated resource plan filing cannot be an efficient use of administrative resources.

9. The Committee's reliance upon the argument that recent Company filings indicate that circumstances as they exist now are different than they were when the Company was preparing and filing its 2007 IRP is insufficient justification to support the Committee's request. As noted by the Company in its reply comments filed October 17, 2007, acknowledgement in Utah generally means that the Company followed the guidelines set out by the Commission in its June 18, 1992 Report and Order in Docket No. 90-2035-01, and that the plan is deemed reasonable at the time it is presented. The integrated resource plan is by design a snapshot in time that is updated biennially. Granting the Committee's request does nothing more than unnecessarily complicates and delays the issuance of a decision in this proceeding.

WHEREFORE, Based upon the foregoing and contrary to the Committee's contentions, no interested party has been prejudiced by the actions of the Company and the Commission should simply proceed with issuing its decision on the Company's 2007 IRP. Rocky Mountain Power respectfully requests that the Commission deny the Committee's request.

DATED this ____ day of January 2008.

Respectfully submitted,

ROCKY MOUNTAIN POWER

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CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of January 2008, a true copy of the foregoing **Response and Objection to Utah Committee of Consumer Services' Request for Hearing or in the Alternative To Reopen Docket for Comments** was transmitted via electronic mail to the following:

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