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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

**RESPONSE OF UIEC, AN INTERVENTION GROUP, TO THE REQUESTS FOR CLARIFICATION**

Docket No. 08-035-38

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The “Utah Industrial Energy Consumers” (“UIEC”), by and through their counsel, respectfully submit this response to the Division of Public Utilities’ (“Division” or “DPU”) request for clarification filed in the above-captioned matter on November 3, 2008, as well as the request submitted by the Committee of Consumer Services (“CCS”) on November 4. The DPU requested that the Utah Public Service Commission (“Commission”) clarify what it meant when it ordered Rocky Mountain Power (“RMP”) “to provide revised base case and test year information to reflect the test year selection.” The CCS requested that the Commission clarify that the “revised base case and test year information” to be filed by December 1, includes updates and amendments to responses to the master data requests.

RMP filed its case in this docket based on a 2007 base case. Based on the current economy, argument of the parties, and the testimony and evidence presented at the hearing of

October 28, it is apparent that the base case of 2007, with escalations, is not reflective of the conditions that RMP will encounter during the period when the rates will be in effect. Instead of using the base case of 2007, which was a period of rising capital costs, easy credit, and a healthier economy, the Company should use available information from a period close in time that is more likely to reflect the loads and costs of the rate effective period. Therefore, RMP should revise its base case to be that of November 2007 through October 2008, subject to information availability.

In addition, the “revised base case and test year information” to be filed December 1 should include updates and/or amendments to all data requests, including the master data requests, to reflect the new base year.

Accordingly, the UIEC joins in the requests that the Commission clarify its Order on Motion for Approval of Test Period to provide that the base case to be used in this docket should be November 2007 through October 2008 (subject to information availability), and that the information to be filed December 1 includes updates and/or amendments to all data requests, including the master data requests.

DATED this 4th day of November, 2008.

/s/ Vicki M. Baldwin  
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## CERTIFICATE OF SERVICE

(Docket No. 08-035-38)

I hereby certify that on this 4th day of November 2008, I caused to be e-mailed, a true and correct copy of the foregoing **RESPONSE OF UIEC, AN INTERVENTION GROUP, TO THE REQUESTS FOR CLARIFICATION** to:

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