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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of the Utah Industrial Energy Consumers for a Deferred Accounting Order Directing Rocky Mountain Power to Defer Incremental REC Revenue for Later Ratemaking Treatment.

MOTION FOR EXTENSION IN UIEC'S DIRECT TESTIMONY FILING DATE

Docket No. 11-035-46

The Utah Industrial Energy Consumers ("UIEC") intervention group hereby submits this motion for an extension until September 8, 2011, to file direct testimony in the above-captioned case. UIEC's direct testimony on these issues is currently due on Thursday, July 21, 2011. UIEC needs additional time to prepare direct testimony.

UIEC's witness, Kevin Higgins, is also a witness in the current general rate case, Docket No. 10-035-124. He is in the midst of preparing surrebuttal in that case on several issues, which is due Tuesday, July 19, 2011—two days prior to the date UIEC's direct testimony is due in this case. Mr. Higgins has also been involved in the settlement negotiations and calculations for the cost of service portion of the general rate case. Hearings on the revenue requirement portion of the general rate case, in which Mr. Higgins will participate, are set to begin July 27 and run

through August 10, excluding Fridays. Mr. Higgins is also involved in matters outside the state

of Utah.

The only parties to the case besides UIEC and Rocky Mountain Power ("RMP" or the

"Company") are the Division of Public Utilities ("Division"), the Office of Consumer Services

("Office"), and the Utah Association of Energy Users ("UAE"). UIEC contacted all the parties

on the morning of July 13 and has received agreement for the extension from all except the

Company.

UIEC asked the Company for the extension by email on the morning of July 13. On the

morning of July 14, the Company responded by email saying merely that it would object to any

extension. UIEC followed-up with a telephone call, but was still denied the extension.

WHEREFORE, UIEC respectfully moves for an extension until September 8, 2011, to

file direct testimony in this case. If the extension is granted, UIEC will work with the parties for

alternative dates for the remainder of the schedule and file an updated schedule.

DATED this 14th day of July, 2011.

/s/ Vicki M. Baldwin

F. ROBERT REEDER

WILLIAM J. EVANS

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PARSONS BEHLE & LATIMER

Attorneys for UIEC, an Intervention Group

CERTIFICATE OF SERVICE

(Docket No. 11-035-46)

I hereby certify that on this 14th day of July 2011, I caused to be emailed, a true and correct copy of the foregoing MOTION FOR EXTENSION IN UIEC'S DIRECT TESTIMONY FILING DATE to:

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