Mary Anne Q. Wood (3539) Stephen Q. Wood (12403) WOOD BALMFORTH LLC 60 E. South Temple, Suite 500 Salt Lake City, UT 84111 Telephone: (801) 366-6060 Facsimile: (801) 366-6061 E-mail: mawood@woodbalmforth.com swood@woodbalmforth.com

Attorneys for Ellis-Hall Consultants, LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF POWER PURCHASE AGREEMENT BETWEEN PACIFICORP AND BLUE MOUNTAIN POWER PARTNERS, LLC Docket No. 13-035-115

MOTION FOR LEAVE TO FILE OVER-LENGTH PETITION FOR REVIEW OR REHEARING OBJECTING TO APPROVAL OF BLUE MOUNTAIN POWER PURCHASE AGREEMENT

Pursuant to Utah R. Civ. P. 7(c)(2), Ellis-Hall Consultants, by and through the undersigned counsel, hereby respectfully requests leave to file an over-length Petition for Review or Rehearing Objecting to Approval of Blue Mountain Power Purchase Agreement ("Petition"). Ellis-Hall is entitled to ten pages of argument under Utah R. Civ. P. 7(c), which is not sufficient to address Ellis-Hall's objections. Ellis-Hall needs an additional 22 pages of argument to fully address the issues contained in its Petition.

Ellis-Hall therefore requests that the Commission grant it leave to file an over-length Petition for Review or Rehearing Objecting to Approval of Blue Mountain Power Purchase Agreement not to exceed 32 pages of argument. DATED this 4th day of November, 2013.

WOOD BALMFORTH LLC

/s/ Stephen Q. Wood Mary Anne Q. Wood Stephen Q. Wood 60 E. South Temple, Suite 500 Salt Lake City, UT 84111 Telephone: (801) 366-6060 Facsimile: (801) 366-6061 E-mail: mawood@woodbalmforth.com <u>swood@woodbalmforth.com</u> Attorneys for Ellis-Hall Consultants, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of November, 2013, a true and correct copy of the

forgoing was served via U.S. Mail, postage prepaid, to the following:

Division of Public Utilities Patricia Schmid Justin Jetter Chris Parker William Powell 160 East 300 South, 4th Floor Salt Lake City, UT 84111

Office of Consumer Services Utah Department of Commerce Brent Coleman Michele Beck Cheryl Murray P. O. Box 146782 Salt Lake City, UT 84114-6782 Rocky Mountain Power Daniel E. Solander 201 S. Main Street, Suite 2300 Salt Lake City, UT 84111

Gary A. Dodge Hatch, James & Dodge 10 W. Broadway, Suite 400 Salt Lake City, UT 84101 *Attorney for Blue Mountain Power Partners, LLC*

Utah Public Service Commission Commission Chairman Ron Allen Commissioner David Clark Commissioner Thad LeVar 160 East 300 South Salt Lake City, UT 84114

/s/ Stephen Q. Wood