



We Partner to Build the New Clean Energy Economy

UTAH PUBLIC SERVICE COMMISSION  
Heber M. Wells Building  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, Utah 84111

March 30, 2016

**RE: Docket No. 15-035-51 – In the Matter of PacifiCorp’s Financial Reports –  
Results of Operations**

Dear Public Service Commission,

Utah Clean Energy submits these comments pursuant to the Commission’s Action Request (January 7, 2016) to the Division of Public Utilities, with an extended deadline of March 30, in docket No. 15-035-51 (In the matter of PacifiCorp’s Financial Reports – Results of Operations). In the Action Request, the Commission requests a general investigation of and recommendations on the Company’s Annual Cost of Service Study filing (initially filed on June 15, 2015, then corrected on June 26, 2015). The Commission also asks some specific questions about different adjustments to account for revenues. Since the Commission issued its action request, PacifiCorp also filed its “Cost of Service Model for Year End 2014 Results of Operations” (January 12, 2016) in the same docket.

Utah Clean Energy files these comments to request an informational meeting or technical conference in which PacifiCorp and the Commission explain how the Cost of Service Model and the Integrated Allocation Model<sup>1</sup> work in order to help parties, such as Utah Clean Energy, who are new to or unfamiliar with the models, understand their mechanics, and to facilitate increased comprehension and use of the models. Utah Clean Energy is additionally interested in exploring the following related issues:

- How do the Company’s and Commission’s cost of service models differ from one another?

---

<sup>1</sup> The Commission’s Integrated Allocation Model was made available most recently in Docket No. 13-035-184, *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*, on December 2, 2014.

- In what types of filings does PacifiCorp utilize its cost of service model (or annual Results of Operations)?
- How do GRID, net power costs, and the Jurisdictional Allocation Model interact with and feed into the cost of service models?

Thank you for the opportunity to submit comments in this matter. Utah Clean Energy looks forward to hearing from the Commission further about these issues.

With best regards,

---

Sophie Hayes, Staff Attorney  
Utah Clean Energy