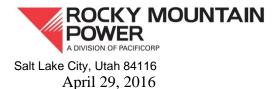
1407 W North Temple, Suite 310



## VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

Utah Public Service Commission Heber M. Wells Building, 4<sup>th</sup> Floor 160 East 300 South Salt Lake City UT 84111

Attention:	Gary Widerburg
	Commission Secretary

Re: Docket No. 06-999-03 Rocky Mountain Power's Fossil Fuel Energy Efficiency Standard Plan

On August 10, 2007, the Public Service Commission of Utah issued its Determination Concerning the PURPA Fossil Fuel Generation Efficiency Standard and adopted the PURPA Fossil Fuel Generation Efficiency Standard with a due date of March 31 each year. On November 25, 2010, the Commission modified the filing schedule to May 1 each year.

Enclosed for filing is the 2016 Rocky Mountain Power Fossil Fuel Heat Rate Improvement Plan. Also included is the summary of the 2015 FERC Form 1 data. The 2016 plan describes the overall heat rate objective to minimize heat rate losses in our operating plants by:

- seeking areas of design changes to improve unit heat rate
- focusing on plant areas of principle heat rate effects
- providing additional training for plant engineers regarding heat rate
- adding new generation resources that have improved heat rates

Pursuant to the direction of the Commission in its letter of July 21, 2015 the company met with interested parties and agreed to enhancements to be included in the 2016 Fossil Fuel Heat Rate Improvement Plan. The enhancements were outlined in a letter to the Commission dated April 12, 2016, as follows:

- An expanded discussion of specific factors that affect heat rate in CCCTs and measures taken to improve those units. (Discussed in the Power Plant Cycles section and the Factors Effecting Optimum Heat Rate section of the 2016 plan.)
- An expanded discussion identifying PacifiCorp's coal and gas units with the best heat rates, discussing the availability of those units, and indicating actions that will be taken to improve the availability of those units in the future. (Discussed in Appendix B of the 2016 plan.)
- An expanded discussion of the controllable Heat Rate Management and Improvement parameters identified on page 11 of the 2014 HRIP. (Discussed in the System Losses due to Controllable Parameters section and the Heat Rate Management and Improvement section short term.)

Rocky Mountain Power has developed the attached plan which is intended to provide useful information focused on key heat rate improvement initiatives. The Improvement Plan filed in years prior to 2014 included coal fired plants only, starting in 2014 the plan includes Company owned and operated combined cycle gas plants.

It is respectfully requested that all formal correspondence and staff requests regarding this filing be addressed to:

By e-mail (preferred):	datarequest@pacificorp.com bob.lively@pacificorp.com
By regular mail:	Data Request Response Center PacifiCorp 825 NE Multnomah, Suite 2000 Portland, Oregon, 97232

Informal questions should be directed to Bob Lively at (801)-220-4052.

Sincerely,

Jeffrey K. Larsen Vice President, Regulation

cc: Division of Public Utilities Office of Consumer Services