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April 27, 2020

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attn: Gary Widerburg
Commission Administrator

Re: **Docket 20-035-12 – In the Matter of the Division of Public Utilities’ Audit of PacifiCorp’s Fuel Inventory Policies and Practices**
Comments on the DPU’s Audit Report

On March 31, 2020, the Division of Public Utilities (“DPU”) filed a report on its findings with respect to its annual audit of PacifiCorp’s fuel inventory policies and practices. In accordance with the Notice of Filing and Comment Period issued April 2, 2020 by the Public Service Commission of Utah, PacifiCorp (d/b/a Rocky Mountain Power) respectfully submits its comments on the DPU’s audit report to briefly address one recommendation.

In response to changing dynamics in the electric industry, the DPU recommends that the Company contract with a consultant to obtain a third-party study to assess the Company’s fuel inventory policies and procedures and/or target inventory levels maintained at each plant. The DPU recommends that the Company complete this task by the end of 2020 or first quarter of 2021. Due to the uncertainty in electric consumption and the economy caused by the COVID-19 public health emergency, the Company recommends waiting to engage a third party for a study until the middle of 2021 when it is believed that significantly less volatility will exist. The Company suggests this issue be discussed at the next annual fuel audit, which will be conducted in the spring of 2021.

Questions may be directed to Jana Saba at (801) 220-2823.

Very truly yours,

Joelle Steward
Vice President, Regulation

cc: Service List (Docket No. 20-035-12)

CERTIFICATE OF SERVICE

Docket No. 20-035-12

I hereby certify that on April 27, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

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