



**ROCKY MOUNTAIN
POWER**
A DIVISION OF PACIFICORP

1407 W. North Temple, Suite 310
Salt Lake City, UT 84116

October 1, 2015

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

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

Attention: Gary Widerburg
Commission Secretary

RE: NOTICE OF PROPOSED RULE AMENDMENT
State Admin Rule Filing Key: 156510

Dear Mr. Widerburg:

PacifiCorp dba Rocky Mountain Power (“Rocky Mountain Power” or “the Company”) hereby submits its comments in the above referenced Notice of Proposed Rule Amendment.

The Company supports the proposed rule change to reduce the amount of paperwork when filing non-confidential versions of confidential or highly confidential information with the Public Service Commission of Utah (“Commission”). The Company believes the proposal to eliminate the requirement for paper copies when such information is filed with the Commission will result in a more streamlined and efficient filing process.

Notably the proposed rule change would be a departure from rules R746-100-3(C) and R746-100-4(A) requiring paper copies for filings. The Company suggests that further efficiencies could be achieved by eliminating the requirement for paper copies for filings not involving confidential information. The Company also suggests that efficiencies could be achieved by a revision to R746-100-3(C)(6) to allow filings to be complete on the day of electronic delivery, contingent upon paper copy delivery the following day. The Company respectfully requests that the Commission open a proposed rule amendment proceeding to address further efficiencies in the filing process.

The Company respectfully requests that inquiries concerning the Company’s proposal be directed to Bob Lively at (801) 220-4052.

Sincerely,



Jeffrey K. Larsen
Vice President, Regulation