

October 27, 2008

Ms. Julie Orchard  
Utah Public Service Commission  
Commission Administrator  
Utah Public Service Commission  
4<sup>th</sup> Floor, 160 East 300 South  
Salt Lake City, UT 84114

Re: Draft Report and Order – Rocky Mountain Power, Docket No. 07-035-93

Dear Ms. Orchard,

Thank you for the additional time to review Rocky Mountain Power's counsel's draft report and order pertaining on the Cost of Service, Rate Spread, and Rate Design stipulation. The Division agrees with the Committee of Consumer Service's concerns regarding Draft Section II, deleting that section because it is inconsistent with prior stipulation orders and is duplicative of a later section in the Stipulation. Furthermore, the Division recommends that the Draft Order be rewritten to conform to prior orders approving stipulations, such as Docket No. 07-057-13 and Docket No. 06-35-2 and then circulated to the parties.

Thank you for the opportunity to submit these comments.

Sincerely,

/s/

Patricia E. Schmid  
Assistant Attorney General  
for the Division of Public Utilities

CC: All parties