



201 South Main, Suite 2300
Salt Lake City, Utah 84111

December 20, 2007

***VIA OVERNIGHT DELIVERY AND
ELECTRONIC MAIL***

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

Attention: Julie P. Orchard
Commission Secretary

RE: Request to eliminate Rocky Mountain Power's requirement to file the Utah State version of the FERC Form No. 1

On April 18 each year, Rocky Mountain Power is required by the Federal Energy Regulatory Commission ("FERC") to file a FERC Form No. 1 detailing financial and operating results for the preceding calendar year. At the same time each year the company also files with the Commission a Utah annual report, which is a Utah allocated condensed version of the FERC Form 1.

In addition, Rocky Mountain Power also files its more detailed regulated results of operations with the Commission twice each year. These results of operations reports include calculations of the Company's revenue requirement as allocated to its Utah jurisdiction. The calendar year results of operations report is filed with the Commission no later than April 30 the following year. The results of operations report is used extensively by the Commission staff, Division of Public Utilities, and Committee of Consumers.

From our discussion with representatives of above agencies they seldom, if ever, rely on the less detailed state version of the FERC Form 1. In reviewing the report's requirements, the Company found no Utah statute, administrative rule, or Commission order requiring this report to be prepared or filed. Therefore, Rocky Mountain Power now respectfully requests that it no longer be required to prepare and file the FERC Form 1 based, Utah annual report.

If the Commission determines that filing the Utah-allocated FERC Form 1 report is still required, Rocky Mountain Power respectfully requests the Commission grant the Company a permanent extension of the filing deadline for this annual report to May 31 each year, one month after the calendar year results of operations are filed. This will to allow the jurisdictional results of operations, which serves and the basis for the state allocations, to be finalized and filed subsequent to the preparation and filing of the state Form 1. As the Company is unable to prepare the state-allocated annual report by April 18, in the past, the Company has requested temporary deadline extensions to complete and file its annual report.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com

By Fax: (503) 813-6060

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Dave Taylor at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation

cc: Division of Public Utilities
Committee of Consumer Services