

hereinafter referred to as the “Parties”. In support of this Motion, Rocky Mountain Power states as follows:

1. On July 17, 2008, Rocky Mountain Power filed an application, together with revenue requirement, cost of service, rate spread and rate design testimony, requesting approval of an increase in its retail electric utility service rates in Utah in the amount of \$160.6 million above the then-currently effective rates (without reference to revenue increases requested in the Company’s 2007 rate case (Docket No. 07-035-93)) for a total revenue requirement in the approximate amount of \$1.592 billion. On September 10, 2008, Rocky Mountain Power filed supplemental testimony to reflect the Commission’s revenue requirement order in Docket No. 07-035-93, adjust net power costs, introduce an amended cost of service study, and update the proposed rate spread.

2. On August 1, 2008, the Commission issued an order establishing the procedural schedule for this case. On August 26, 2008, September 29, 2008, and September 30, 2008, the Commission issued orders amending the schedule. On October 14, 2008, the Commission issued an additional scheduling order for the Revenue Requirement and Cost of Service/Rate Design portion of this case. On October 30, 2008 and November 6, 2008, the Commission issued orders modifying the Revenue Requirement and Cost of Service/Rate Design procedural schedule. On January 27, 2009, the Commission issued a scheduling order amending the schedule for the Rate Design/Cost of Service phase of this case.

3. On October 28, 2008, the Commission held a hearing on Rocky Mountain Power’s Motion to Determine Test Year wherein Rocky Mountain Power sought approval to use a test period ending June 2009. On October 30, 2009, the Commission

issued an order approving a test period ending December 2009, using average rate base. Rocky Mountain Power subsequently filed supplemental direct testimony and exhibits with the Commission on December 8, 2008, which included a revised revenue increase request of \$116.1 million, a cost of capital request of 8.69% and return on equity of 11.0% with a 51.5% common equity component.

4. On February 4 and 9, 2009, certain Parties held settlement conferences to discuss cost of capital issues in the 2008 General Rate Case.

5. As a result of the settlement negotiations, certain Parties reached a compromise on cost of capital at issue in this case. The settlement resulted in a return on equity of 10.61 percent and a capital structure with a 51.0 percent common equity component. The Commission held hearings on March 12, 2009 and approved the cost of capital stipulation from the bench.

6. On March 17 and 18, 2009, the Parties held settlement conferences to discuss revenue requirement issues in the 2008 General Rate Case. On March 18, 2009, notice was provided to all intervenors advising all parties who filed revenue requirement testimony and others that the parties had reached an agreement in principle, and that a draft stipulation would be circulated. On March 19, 2009 a copy of the draft stipulation was circulated to all intervenors.

7. As a result of the settlement negotiations, the Parties have agreed to the revenue requirement in this case and other matters specified in the Stipulation, which necessitates that the Commission (1) stay the procedural schedule as it relates to Phase II Revenue Requirement sur-rebuttal testimony and joint issues list, due March 23, 2009;

(2) hold the hearing for approval of the Stipulation on Tuesday, March 31, 2009 at 2:00 (MST), and hold public witness hearing on the same date at 4:00 (MST).

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission (1) stay the procedural schedule as it relates to Phase II Revenue Requirement sur-rebuttal testimony and joint issues list, due March 23, 2009; (2) hold the hearing for approval of the Stipulation on Tuesday, March 31, 2009 at 2:00 (MST), and hold public witness hearing on the same date at 4:00 (MST); and (3) direct any parties that wish to oppose the Stipulation to notify the Parties at least five days prior to the hearing so the Parties can arrange for technical witnesses to be present at the hearing.

DATED: March 23, 2009.

Respectfully submitted,

Mark C. Moench
Yvonne R. Hogle
Rocky Mountain Power

I hereby certify that on this 23rd day of March, 2009, I caused to be emailed a true and correct copy of the foregoing **MOTION TO SUSPEND SURREBUTTAL TESTIMONY AND JOINT ISSUES LIST AND TO SET STIPULATION HEARING DATE** in Docket No. 08-035-38 to the following:

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