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Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of)	
ROCKY MOUNTAIN POWER)	
for Approval of a Partial Requirement)	DOCKET NO. _____
Electric Service Agreement Between)	
PacifiCorp and Tesoro Refining and)	
Marketing Company)	PETITION FOR APPROVAL
)	AND PROTECTIVE ORDER
)	

Pursuant to Utah Code Ann. § 54-12-2, PacifiCorp, doing business in Utah as Rocky Mountain Power (“Rocky Mountain Power” or “Company”) hereby applies for an order approving the Partial Requirement Electric Service Agreement (“Agreement”) between PacifiCorp and Tesoro Refining and Marketing Company (“Tesoro”) dated November 23, 2009. The Company is including the Prefiled Direct Testimony of Paul H. Clements with this filing in support of the Petition. Rocky Mountain Power also requests that the Commission enter a protective order to protect confidential information in the contract from disclosure. In support of its Petition for Approval, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a division of PacifiCorp. PacifiCorp is an Oregon corporation that provides electric service to retail customers through its Rocky

Mountain Power division in the states of Utah, Wyoming, and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington.

2. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately 770,000 customers and has approximately 2,400 employees in Utah. Rocky Mountain Power's principal place of business in Utah is 201 South Main Street, Suite 2300, Salt Lake City, Utah 84111.

3. Communications regarding this Application should be addressed to:

Paul Clements
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
Telephone: (801) 220-4470
Facsimile: (801) 220-2798
Email: paul.clements@pacificorp.com

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In addition, Rocky Mountain Power requests that all data requests regarding the Application be sent in Microsoft Word or plain text format to the following:

By email (preferred): datarequest@pacificorp.com

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

Informal questions may be directed to Dave Taylor, Utah Regulatory Affairs Manager at (801) 220-2923.

4. The Company currently provides full requirements electric service to Tesoro through an Electric Service Agreement which is scheduled to expire on December 31, 2009.

5. The Company and Tesoro have reached a settlement on a new ESA, and request that the Commission establish a hearing date as soon as practicably possible to ensure approval of that agreement prior to the expiration of the current contract. The terms of the contract require it to be confidential, so Rocky Mountain Power is filing the contract under seal, and requesting that the Commission enter a protective order in substantially the same form as the attached proposed protective order.

6. Rocky Mountain Power respectfully requests that the Commission approve the attached Agreement between the Company and Tesoro as establishing just and reasonable rates, terms and conditions for back-up and supplemental electric service to be supplied by the Company to Tesoro on and after January 1, 2010. Rocky Mountain Power is also submitting with this Application the pre-filed direct testimony of Paul H. Clements in support of the Application.

Requested Relief

7. Rocky Mountain Power respectfully requests the Commission to promptly enter a protective order to facilitate the exchange of confidential information, and set dates for plenary hearings that will enable the Commission to approve the Agreement entered into by and between the Company and Tesoro as establishing long-term rates and

conditions for partial requirement service to Tesoro that are just, reasonable and in the public interest.

RESPECTFULLY SUBMITTED this ___th day of November, 2009

Daniel E. Solander
Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of November, 2009, I caused to be served via electronic mail, a true and correct copy of the foregoing Petition for Approval and Protective Order of Rocky Mountain Power to the following:

Michael Ginsberg
Trisha Schmid
Assistant Attorney General
Division of Public Utilities
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160 East 300 South
Salt Lake City, UT 84111

Reed Warnick
Paul Proctor
Assistant Attorney General
Committee of Consumer Services
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