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*Attorneys for Rocky Mountain Power*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Application of Rocky  
Mountain Power for Approval of its Proposed  
Energy Cost Adjustment Mechanism

DOCKET NO. 09-035-15

**MOTION FOR A DEFERRED  
ACCOUNTING ORDER**

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Rocky Mountain Power, a division of PacifiCorp, (“Rocky Mountain Power” or the “Company”), hereby moves the Public Service Commission of Utah (“Commission”) for entry of a deferred accounting order to allow the Company to defer, on a monthly basis, the difference between the net power costs (“NPC”) allowed by the Commission’s final order in the Company’s 2009 General Rate Case in Docket No. 09-035-23 (the “2009 General Rate Case”) and the actual net power costs incurred until the Commission

issues a final order in Phase II of this Energy Cost Adjustment Mechanism (“ECAM”) proceeding. In support of its motion, 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. 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 800,000 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.

2. Rocky Mountain Power files this motion pursuant to Utah Code Ann. §54-4-1 and §54-4-23 which provide the Commission with general jurisdiction to supervise and regulate, and the power to establish a system of accounts to be kept by, public utilities subject to its jurisdiction.

3. Communications regarding this filing should be addressed to:

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

By email (preferred): [datarequest@pacificorp.com](mailto: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. On March 16, 2009, the Company filed with the Commission an application for a proposed ECAM in this docket because it does not have a reasonable opportunity to recover its actual and prudently incurred NPC for service in Utah under the current ratemaking mechanisms.

5. As described in the testimony filed with the application, the proposed ECAM is a mechanism that would allow the Company to recover its prudently incurred NPC consistent with the Commission's statutory responsibility to set rates that are just and reasonable. In its original request, Rocky Mountain Power requested that the ECAM proceeding conclude and a mechanism be implemented concurrently with the final revenue requirement order in its 2009 General Rate Case, which is expected to be issued on or before February 18, 2010.

6. On January 12, 2010, the Commission concluded hearings on Phase I of this proceeding. On February 8, 2010, the Commission issued its Report and Order concluding it “will proceed to Phase II of this docket to consider [the Company’s] proposed ECAM and any modifications or alternatives which parties might propose.”

7. Based on the conclusion in the Commission’s Report and Order, the Company requests that it be allowed to begin deferring the difference between NPC approved in the 2009 General Rate Case, and actual NPC incurred. The amount deferred would be calculated as described in the Company’s application and testimony in this docket, and deferral would begin coincident with the effective date of new rates from the 2009 General Rate Case.

8. Phase II of this proceeding is expected to take several months, and allowing the Company to defer the difference in NPC on a monthly basis will protect both the Company and its customers, and will eliminate time pressures associated with Phase II of this proceeding because costs will be preserved for possible future recovery until the Commission approves an ECAM. All types of costs and amounts deferred will ultimately be trued-up to align with the Commission’s final order in this docket prior to any future recovery or refund.

WHEREFORE, Rocky Mountain Power respectfully requests an accounting order authorizing it to record in FERC Account 182 the difference between NPC ordered in its 2009 General Rate Case and actual NPC incurred on a monthly basis until the Commission approves an ECAM.

DATED: February \_\_, 2010.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 9th day of February, 2010, on the following:

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