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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations	Docket No. 09-035-23 **ROCKY MOUNTAIN POWER'S PETITION FOR CLARIFICATION OR RECONSIDERATION OF NOVEMBER 9, 2009 ORDER**

Rocky Mountain Power, a division of PacifiCorp ("Rocky Mountain Power" or "Company"), pursuant to Utah Code Ann. §§ 54-7-15, 63G-4-302, and Utah Administrative Code R746-100-11.F, hereby respectfully requests that the Commission clarify its Order Staying October 19, 2009 Order, which was issued November 9, 2009 in this docket ("Stay Order"). Rocky Mountain Power sincerely appreciates the Commission's issuance of the Stay Order. Nevertheless, the Company respectfully requests that the Commission clarify that the Stay Order vacates the Order issued October 19, 2009 in this docket ("Inter-jurisdictional Allocation Order"

or “IA Order”) and that the future rate change referenced in the Stay Order refers to the Company’s next general rate case. If the Commission determines that it cannot clarify the Stay Order as requested, Rocky Mountain Power respectfully requests that the Commission reconsider the Stay Order and specify that consideration of changes to inter-jurisdictional allocation will be considered in the Company’s next general rate case.

I. INTRODUCTION

A. MSP and 2004 Stipulation

The Company filed its application to initiate investigation of inter-jurisdictional issues in Docket No. 02-035-04 on March 5, 2002. On April 4, 2002, the Commission initiated the investigation and the Multi-State Process (“MSP”). Other state commissions also approved the MSP. During the next two years, monthly multi-day meetings and numerous teleconferences were held in which Commission staffs and other interested parties from five of the Company’s jurisdictions participated under the direction of an independent facilitator approved by all state Commissions.[1]

On September 30, 2003, the Company filed a motion and supporting testimony requesting that the Commission ratify an inter-jurisdictional cost allocation protocol. Numerous technical conferences were held on the motion and protocol in Docket No. 02-035-04. In addition, further MSP meetings were held on the protocol. On May 21, 2004, the Company filed supplemental testimony and a revised protocol for inter-jurisdictional allocations (“Revised Protocol”). On July 28, 2004, the Company, Division of Public Utilities (“Division”), Committee of Consumer Services (now the Office of Consumer Services or “Office”), UAE Intervention Group (“UAE”), Salt Lake Community Action Program, Crossroads Urban Center, AARP and the Federal Executive Agencies filed a stipulation supporting adoption of the Revised

Protocol in conjunction with rate mitigation measures ("2004 Stipulation"). Following the filing of additional testimony and a hearing, the Commission issued a Report and Order on December 14, 2004, approving the 2004 Stipulation. The Commissions in Idaho, Oregon and Wyoming likewise approved the Revised Protocol and, although not formally approved, the Revised Protocol is used in California as well.

The Revised Protocol established the MSP Standing Committee to review issues arising under the Revised Protocol. The Revised Protocol provides that:

> Prior to departing from the terms of the Protocol, consistent with their legal obligations, Commissions and parties will endeavor to cause their concerns to be presented at meetings of the MSP Standing Committee and interested parties from all States in an attempt to achieve consensus on a proposed resolution of those concerns.

Revised Protocol at 14. In approving the 2004 Stipulation, which adopted the Revised Protocol with rate mitigation measures, the Commission effectively accepted this agreement.

B. Current Review of Inter-jurisdictional Allocation Concerns in the MSP

Consistent with the agreement in the Revised Protocol, the Commission initiated the current MSP review of inter-jurisdictional allocation concerns at the MSP Commissioners Forum on November 6, 2008. At that time, it was agreed that the Company would undertake to update its 2004 analysis of the effects of the Revised Protocol with the Commissioners expressing "their desire to have such a review completed in the next year" with the results presented at the next Commissioners Forum.[2]

Pursuant to that request, the Company provided an updated preliminary forecast comparing the Utah revenue requirement under the Revised Protocol and the Rolled-In method ("2009 Preliminary Forecast") to the MSP Standing Committee work group on August 17, 2009.

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[1] California monitored the MSP, but did not actively participate.

[2] The next Commissioners Forum is March 9, 2010.

Thereafter, on September 10, 2009, in response to the 2009 Preliminary Forecast, the Commission, Division and Office ("Utah Parties") submitted a proposal to the MSP Standing Committee to consider whether it remained in the interests of Utah customers to continue to use the Revised Protocol. The Utah Parties provided a more detailed proposal during the September 29, 2009 MSP Standing Committee conference call. This included a "Strawman Solution" to move to Rolled-In allocation method.[3] The Utah Parties also proposed a schedule for developing possible solutions to their concern to be completed by November 30, 2009.

The MSP Standing Committee held a conference call on the issue on October 13, 2009. During this call, Oregon expressed its intent to propose an alternative to the Utah strawman proposal. In addition, the Company agreed to develop a concept paper that identifies the various elements of the Revised Protocol that drive the differences between Rolled-In and Revised Protocol allocations. This would allow states to consider possible consensus modifications to the Revised Protocol. The Standing Committee agreed that Oregon's proposal and the Company concept paper would be circulated by October 26, 2009 and would be discussed on a conference call on October 29, 2009. Additional conferences were tentatively set for November 19 and December 9, 2009, and, as noted above, the next Commissioners Forum is scheduled for March 9, 2010.

This process was delayed as a result of the issuance of the IA Order. It has now recommenced. The Oregon alternative and the Company's concept paper were discussed on the November 19, 2009 conference call. In addition, time has been reserved on calendars for conference calls of the Standing Committee workgroup on January 7, February 11 and February 25, 2010.

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[3] The Rolled-In method was adopted by the Commission in the Company's 1997 general rate case, Docket No. 97-035-04, and used in subsequent general rate cases prior to the 2004 Stipulation.

C. IA Order and Stay Order

The issue of possible change in inter-jurisdictional allocation method first arose in this docket when the Commission issued the IA Order on October 19, 2009. The IA Order directed the Division and invited other parties to provide testimony on two questions: (1) "Are the continued use of the 2004 Stipulation terms for the development of the Utah revenue requirement in this case in the public interest?" and (2) "Whether there are alternatives, such as the use of the Rolled-In method without the revenue requirement adjustments contained in the 2004 Stipulation terms, which would be just and reasonable in this case." IA Order at 3.

The Company filed a Petition for Immediate Stay and Reconsideration of the IA Order ("First Petition") on October 22, 2009. The First Petition sought an immediate stay of the IA Order because, as long as the order was in place, the MSP Standing Committee could not continue its consideration of the same issue. The Petition also sought reconsideration and vacation of the IA Order because: (1) there was insufficient time to accord the parties due process in considering the issue in the context of the schedule in this case, (2) the analysis that was the basis for the IA Order was preliminary and would not be sponsored in evidence by any party, and (3) proceeding with consideration of the issue in this docket would undermine and might destroy the MSP.

The Division, Utah Industrial Energy Consumers ("UIEC"), Office and UAE filed responses to the First Petition, agreeing that there was insufficient time to consider the issue in the context of the rate case and that the issue could be better addressed at least initially in the MSP. The Division and UAE also acknowledged that they were required by the 2004 Stipulation to seek in good faith to address inter-jurisdictional allocation concerns with the MSP Standing

Committee to attempt to reach multi-state consensus before advocating a departure from the 2004 Stipulation.[4]

The Commission issued the Stay Order on November 9, 2009. Rocky Mountain Power appreciates the Commission doing so because the Stay Order has allowed the MSP Standing Committee to resume consideration of the inter-jurisdictional allocation concern raised by the Utah Parties at least temporarily and because the Stay Order clarifies that parties need not file testimony on the issue on November 12, 2009. However, although the Stay Order stays the IA Order, it does not vacate it. In addition, the Stay Order states that the Commission "intend[s] to have inter-jurisdictional allocation issues addressed and the reasonableness of any allocation established prior to our approval of any future change in RMP's rates." Stay Order at 2. As discussed below, these aspects of the Stay Order may give rise to confusion. Accordingly, the Company requests that the Commission clarify the Stay Order to make clear that the IA Order is vacated and that the "future change in RMP's rates" referenced in the Stay Order refers to the Company's next general rate case.

If the Commission determines that it cannot clarify the Stay Order, the Company requests that the Commission reconsider the Stay Order and modify it to specify that consideration of changes to inter-jurisdictional allocation will be considered in the Company's next general rate case.

II. ARGUMENT

A. The Commission Should Clarify that the Stay Order Vacates the IA Order.

A stay of an order operates to temporarily stay the operation or effectiveness of the order pending some other action. For example, an order may be stayed pending reconsideration or

[4] Although not mentioned in its response, the Office is also bound by the 2004 Stipulation.

appeal or may be stayed for a period of time to allow some event to occur before it becomes effective.[5] Vacating an order, on the other hand, undoes the order and eliminates its pendency.[6]

Rocky Mountain Power understands that the Commission does not intend to reinstate the IA Order later in this docket. The only operative provision of the IA Order directed the Division and invited other parties to file testimony on inter-jurisdictional allocation issues by November 12, 2009. The Stay Order clearly provides that parties need not address inter-jurisdictional allocation issues in that testimony. Thus, the operative provision of the IA Order has been nullified by the Stay Order.

Despite this relatively clear intent, it is possible that the Stay Order may be misconstrued because it only *stays* the IA Order and because it states the Commission's intention to address the reasonableness of inter-jurisdictional allocations "prior to our approval of *any* future change in RMP's rates." Stay Order at 2 (emphasis added). There will be a future change in the Company's rates at the conclusion of this case. Therefore, it is possible that the Stay Order may be construed to allow reintroduction of the inter-jurisdictional allocation issue later in this case and consideration and a decision on it before "any" change is made in the Company's rates in this case. Such a construction would be inconsistent with the rate change going into effect within 240 days of the filing of the application (Utah Code Ann. § 54-7-12(3)) and might hamper further consideration of inter-jurisdictional allocation issues by the MSP Standing Committee

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[5] *See, e.g. United States v. Boal*, 534 F.3d 965, 968 (8th Cir. 2008) (acknowledging that district court stayed its order pending appeal); *Conner v. United States*, 434 F.3d 676, 680 (4th Cir. 2006) (noting that district court stayed the effect of its final order pending appeal); *Batavia, Naperville, etc. v. Federal Energy Regulatory Comm'n*, 672 F.2d 64, 78 (D.C. Cir. 1982) (noting that order had been stayed pending reconsideration).

[6] *Bryan v. BellSouth Communs., Inc.,* 492 F.3d 231, 241 (4th Cir. 2007) (**"**To say that when an order is vacated it is as if the order never existed is a convenient way of describing the effect of the vacatur."); *State v. Jackson*, 2006 Del. Super. LEXIS 147 at *9, n.20 (Del. Super. Ct. Apr. 5, 2006) ("The word 'vacate' is defined as 'to nullify or cancel; make void; invalidate.' Black's Law Dictionary 1546 (7th

based on a concern that the stay may be lifted before consideration of the inter-jurisdictional allocation issue raised by the Utah Parties in the MSP is completed. This potential ambiguity may be resolved simply by clarifying that the Stay Order vacates the IA Order.

B. The Commission Should Clarify that the Reference to "Any Future Change in Rates" in the Stay Order Refers to the Company's Next General Rate Case.

The Stay Order apparently intends to vacate the IA Order for purposes of this docket, but leaves open the possibility that the Commission may consider inter-jurisdictional allocations in the next case in which the Company proposes any rate change regardless of the scope of the case. For example, the parties have stipulated in this case that the Company may file a major plant addition case on or after February 1, 2010 to deal with certain major plant additions currently scheduled to go into service in May and June of 2010.[7] Consistent with the purpose of section 54-7-13.4, this application will seek rate changes based solely on the impact on revenue requirement of these major plant additions. It would be inappropriate to consider inter-jurisdictional allocation issues in this major plant addition case for several reasons.

First, section 54-7-13.4 was a part of Senate Bill 75 passed in the 2009 General Session of the Utah Legislature. Everyone involved with SB 75 knows that the purpose of this section is to confirm that a gas or electric utility may file a single-item rate case for recovery of the costs of a major plant addition rather than being required to file a general rate case to obtain recovery of those costs. It would be manifestly contrary to that intent and purpose to introduce the complex issue of inter-jurisdictional allocations into this otherwise limited case.

Second, failure to consider this issue in the major plant addition case is not a dereliction of the Commission's duty to determine just and reasonable rates because it would make no

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ed. 1999). Thus, a vacation of an order is a nullification of the order. A 'stay', however, has been defined as "the postponement or halting of a proceeding, judgment, or the like. *Id* at 1425.").

[7] Test Period Stipulation, Docket No. 09-035-23 (May 14, 2009) ¶ 10.a.

difference in rates determined in that case. For each of the major plant additions that will be the subject of single-item rate cases between this case and the next general rate case, the allocation of the costs of the plant additions would be essentially identical under either the Revised Protocol or Rolled-In methods. Under the terms of the Revised Protocol, all transmission resources and all new generation resources are allocated system-wide based on the same System Generation ("SG") and System Energy ("SE") factors that would be applied under a Rolled-In allocation methodology. As a result, there cannot be harm to Utah customers if consideration of the allocation issue is delayed until the next general rate case.

Third, as all parties responding to the Company's First Petition have acknowledged, consideration of difficult and complex inter-jurisdictional allocation issues cannot be reasonably accomplished within the 122 days between the IA Order and the expiration of the 240-day period in this case.[8] Section 54-7-13.4 contemplates that major plant addition cases will be completed within 150 days if the major plant addition was not reviewed and approved under the Energy Resource Procurement Act, Utah Code Ann. § 54-17-101, *et seq*. The major plant additions that will be the subject of the February 2010 application were not reviewed and approved under the Act. Therefore, the time frame for the major plant addition case will be 150 days. This is only 28 days more than the 122 days that the parties agreed was unreasonable to consider complex inter-jurisdictional allocation issues in this case. There will not be sufficient time to reasonably address the issues in the February major plant addition case. This is particularly the case because the February application will be the first major plant addition case under the new statute.

Fourth, introducing the issue in the February major plant addition case could undermine and might destroy the MSP. Even before the delay in the MSP review of the issue occasioned by

[8] There are 122 days between October 19, 2009, the date the IA Order was issued, and February 18, 2010, the last day of the 240-day period in this rate case.

the IA Order, it was not contemplated that the states could reach consensus on the issue prior to the potential resolution being presented to the Commissioners of the four participating states at the Commissioners Forum on March 9, 2010. In fact, given the nearly two-year process necessary to develop the Revised Protocol, it is reasonable to anticipate that the MSP may still be engaged in productive consideration of the issue for some reasonable period of time after March 9, 2010, based on input received at the Commissioners Forum. Consideration of the issue in an adjudicative proceeding commencing in February of 2010 prior to the next Commissioners Forum on March 9, 2010 would likely require suspension once again of MSP consideration of the issue. The MSP cannot consider the issue and attempt to reach consensus on it if the issue is currently being unilaterally litigated before the Commission both because communications with the Commission or its staff regarding the issue in the MSP would be illegal ex parte communications and because it is impractical for the MSP to fairly consider the issue if the Commission is already in the process of ruling on it.

The MSP is critical to the Company and its customers for several reasons. First, the Company's ability to invest in resources and infrastructure necessary to provide reliable service to customers, and particularly the growing customer base in Utah, will be severely damaged if the Company is not allowed a reasonable opportunity to earn a return on those investments. Second, if the entire investment of the Company in facilities required to provide safe, reliable and adequate service to its customers is not allocated among the states, the Company will be financially damaged. As the Commission is well aware, customers are the ultimate losers when credit ratings decline or consistent underearnings occur. Third, the likely alternative to a consensus approach to allocation is some sort of division of the Company. The Commission has consistently opposed this result because it would eliminate the benefit of integrated system-wide planning and operations. The Commission should not risk upsetting the delicate balance that has

allowed the MSP to work providing benefits to all concerned parties by prematurely considering departing from the 2004 Stipulation.

Fifth, interested parties specifically negotiated the rate mitigation measures in the 2004 Stipulation as part of the package of compromises and considerations that allowed the parties in Utah and in other states to reach agreement in the MSP. These rate mitigation measures, which were specifically designed to protect customers in the event the Revised Protocol resulted in higher rates than the Rolled-In method through March 31, 2014, were supported by the parties and adopted by the Commission. Although parties reserved the right to challenge the application of the 2004 Stipulation in future rate cases, the Office recommended that the Commission should open a docket to consider whether the Revised Protocol resulted in just and reasonable rates if *after 2014*, the Utah revenue requirement under the Revised Protocol exceeds that under the Rolled-In method by one percent.[9] The Commission acknowledged this recommendation in approving the 2004 Stipulation.[10] Consideration of changes to the 2004 Stipulation in the Company's next general rate case will be prior to the time contemplated in the 2004 Stipulation.

The Company's application for an Energy Cost Adjustment Mechanism ("ECAM") is pending in Docket No. 09-035-15 and will be resolved prior to the Company's next general rate case. Approval of the ECAM, however, will not initially result in any change in rates, but will instead establish a mechanism under which differences between Net Power Costs included in base rates in this docket and Net Power Costs actually incurred will be deferred for later collection or refund in a 2011 rate change. Consideration of the inter-jurisdictional allocation issues in an ECAM proceeding would not be necessary in 2011 since the Company would include an affirmative case on allocations in its rate case to be filed on or after January 1, 2011.

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[9] Report and Order, Docket No. 02-035-04 (Utah PSC Dec. 14, 2004) at 17.

[10] *Id.* at 38.

For these reasons and other reasons discussed above, the ECAM docket would likewise be an inappropriate case to consider the complex issue of changes in the 2004 Stipulation.

For all of the foregoing reasons, the Commission should clarify that the reference in the Stay Order to a future change in the Company's rates applies to the Company's next general rate case that may not be filed earlier than January 1, 2011.[11]

C. If the Commission Determines that It Cannot Clarify the Stay Order, the Commission Should Reconsider the Stay Order and Rule that Changes to the 2004 Stipulation Will be Considered in the Company's Next General Rate Case.

If the Commission determines that it cannot clarify the Stay Order to provide that it vacates the IA Order and that the reference in the Stay Order to a future change in the Company's rates refers to the Company's next general rate case, the Company requests that the Commission reconsider the Stay Order. Based on the foregoing analysis, the Stay Order should be modified to specify that changes to the inter-jurisdictional allocation method provided by the 2004 Stipulation will be considered in the Company's next general rate case.

III. CONCLUSION

Rocky Mountain Power sincerely appreciates the Commission's issuance of the Stay Order. The Stay Order has averted a crisis that threatened to undermine if not destroy the MSP and has allowed this rate case to proceed in an orderly manner, focusing on the issues raised by the parties in their direct testimony. Nonetheless, the Company respectfully requests that the Commission clarify that the Stay Order vacates the IA Order and that the future rate change referenced in the Stay Order refers to the Company's next general rate case. If the Commission determines that it cannot clarify the Stay Order as requested, the Company respectfully requests that the Commission reconsider the Stay Order and order that consideration of changes to inter-jurisdictional allocation will be considered in the Company's next general rate case.

DATED: November 19, 2009.

Respectfully submitted,

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[11] Test Period Stipulation, *supra*, ¶ 12.

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **ROCKY MOUNTAIN POWER'S PETITION FOR CLARIFICATION OR RECONSIDERATION OF NOVEMBER 9, 2009 ORDER** to be served upon the following by electronic mail to the addresses shown below on November 19, 2009:

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