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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Pending Application of Rocky Mountain Power for a Certificate of Public Convenience and Necessity Authorizing Construction of Mona – Oquirrh new 500 kV double circuit line</p>	<p>Docket No. 09-035-__</p> <p>ROCKY MOUNTAIN POWER’S NOTICE OF INTENT TO FILE APPLICATION FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY</p>
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Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or the “Company”), notifies the Public Service Commission of Utah (“Commission”), the Division of Public Utilities (“DPU”), and the Office of Consumer Services (“OCS”) of its intent to file a formal Application for a certificate of public convenience and necessity (“CPCN”) authorizing the construction of a 500 kV transmission line, known as the Mona - Oquirrh Transmission Line (“Mona-Oquirrh Line” or “Project”), in Juab, Utah,

Tooele, and Salt Lake Counties. Given the tight time frames under which the Company will be operating once it is able to file its Application, this Notice contains most of the information that would typically be included in the Application itself—the Company is doing so in order that the DPU, OCS, or other intervening parties may begin their analysis of the planned transmission line in the light of the standards set by the Commission for the granting of a CPCN.

1. Rocky Mountain Power is an electrical corporation and public utility subject to the jurisdiction of the Commission. In addition to providing retail electric service in the state of Utah, Rocky Mountain Power provides retail electric service in Idaho and Wyoming.

2. Communications, including all pleadings or other filings, regarding this Notice should be addressed to:

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The Company also respectfully requests that all formal correspondence and data requests regarding this filing be sent to:

By e-mail (**preferred**) to: datarequest@pacificorp.com

By regular mail to: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite

Portland, OR 97232

By fax to: (503) 813-6060

3. The Company recognizes that the procedure that it is suggesting herein is somewhat unusual. But for the following reasons, it is important that a docket be opened and for discovery to commence even prior to the filing of the formal Application.

a. One of the key reasons that Rocky Mountain Power cannot yet file its formal Application is that it currently in the process of obtaining federal approval for the Project pursuant to the National Environmental Protection Act. Accordingly, Rocky Mountain Power is in the process of obtaining an Environmental Impact Statement (“EIS”) for the Project. The purpose of the federal permitting process is to ensure the Project and its route is consistent with state and local governmental actions and authorities. The EIS process will identify significant environmental impacts and shall inform local decision makers and the public of reasonable alternatives, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality. The federal process is intended to encourage the resolution of potential concerns or problems prior to issuing a final statement and approval of a final route. The Company is confident that the route it has chosen and its plans as to the manner of construction of the Project will comply in all respects with all applicable environmental laws and regulations.

b. In past orders, the Commission has ruled that the issues of approval of the location and routing of a transmission line is beyond the scope of the CPCN process. However, as a condition of approval the Company must “file

in the office of the commission evidence as required by the commission to show that the applicant has received or is in the process of obtaining the required consent, franchise, or permit of the proper county, city, municipal, or other public authority” (Utah Code Ann. § 54-4-25(4)(a)(i)).

c. Until the EIS process has been completed in about late July 2009, the routing and location of the transmission line and the scope of the project remain uncertain. Issuance of a final EIS will then determine the route of the transmission line and the scope of the project. The Company will then file applications with each appropriate municipality and county for the appropriate consent, permit, or certification for the transmission line within 30-60 days thereafter.

d. As will be explained more fully in the Company’s Application to be filed after issuance of the EIS, the Mona-Oquirrh Line is a critical part of the Company’s overall plans to improve its transmission capacity to serve customers in Utah, and to improve its grid for the benefit of customers in Utah and in the other states the Company serves. The Company’s current plans are to commence construction of the Mona-Oquirrh line in January 2010, which leaves a relatively short period of time between the date the Application for the CPCN is filed with the commission and the time in which approval of the CPCN is needed.

e. Given the situation described above, the Company desires to work with the Commission and other parties on procedures that will allow full inquiry into the matter, but which will also allow an expedited hearing following the Company’s filing of its formal Application. For example, the Company is willing

to agree to the immediate commencement of discovery. Recognizing that some questions may not be answerable at this time, the Company is committed to answering all relevant questions that it can answer at this time and, as to those that it cannot answer, immediately update its answers when the information necessary to answer such questions becomes available to the Company. The Company is also willing, in advance of filing of the Application, to file all of the testimony it possibly can (subject, of course, to the right to supplement that testimony to reflect new facts or any changes in Company plans). For example, the Company is willing, prior to filing its Application to file testimony as the Company's ability to finance the project, testimony addressing specific aspects of the project and the benefit that will accrue to customers from its construction. The Company will file Preliminary Direct testimony within one week of the date of this Notice. Certain specific aspects of the project that will only be available once the EIS is issued may not be addressed immediately, but the Company will either supplement existing testimony with those details or file additional testimony from other witnesses on an expedited basis so that the Commission and other parties may have the opportunity to review and respond to it in a timely manner.

f. Recognizing that the Company is proposing an approach to this docket that is out of the ordinary, the Company requests that the Commission issue an order making this matter a formal docket, that it enter a protective order (the Company will file a motion for such an order within the next few days), that its order allow parties (other than the DPU and OCS, who are already considered

parties) to intervene in this matter subject to the standards of intervention, and that the order allow the parties hereto to immediately engage in discovery.

g. Under the Company's current plans it is essential that this matter be analyzed by the other parties, that hearings be held (if necessary), and that a CPCN be issued no later than December 15, 2009. This will allow the contracting process to move forward so that the project can be completed in a timely manner. That is the reasons that the Company has proposed the innovative procedure in this notice that will allow intervention and discovery to proceed before the Application is filed.

4. Even though this Notice is not the Company's formal Application, the Company is in a position at this time to provide the following general information about the Mona-Oquirrh Line project.

5. The Project is planned as a system improvement and expansion project to: (1) meet the projected shortfalls in electrical supply in the Wasatch Front area of Utah, (2) improve operational flexibility and reliability of the high-voltage transmission system and service to the Wasatch Front, (3) allow increased economical power transfers, sales, and purchases into and throughout Utah in the short- and long-term including access to renewables, and (4) integrate facilities with short-term and long-range planning efforts on federal, state, and private lands.

6. The proposed project is an overhead transmission line from the Mona Annex Substation near the City of Mona in Juab County, Utah to a new substation facility in the Tooele Valley (the "Limber Substation") and expanded facilities within the

existing Oquirrh Substation property located in West Jordan, Utah and the Terminal Substation located in Salt Lake City, Utah.

7. The Project does not involve any construction that will cross state boundaries.

8. Rocky Mountain Power will comply with all relevant environmental laws and restrictions applicable to construction of the Project.

9. The Project is not driven by any commitment made to any regulatory agency but is driven by the need to provide current and future service in an efficient and reliable manner to customers.

10. As will be further described in testimony to be filed on behalf of the Company, the Mona-Oquirrh Line will:

a. Meet Rocky Mountain Power's need to provide safe, reliable, and cost-effective electric transmission service to its retail customers and other users of the transmission system;

b. Provide additional capacity to meet projected load demand by 2012 and add much-needed import capacity into the Wasatch Front and beyond from the desert areas southwest of the Wasatch Front or new generation resources in central/southern Utah. The project is designed to leverage net power cost savings by optimizing market purchase or cheaper energy resources outside of the Wasatch Front. Savings, which benefit both the Company and its customers, are derived from the difference between constructing new generation resources locally and importing energy.

11. Currently, a majority of the electricity serving the northern Utah area is generated at Rocky Mountain Power facilities in Carbon, Juab, and Emery counties and is delivered on existing transmission lines that enter the Wasatch Front area from the south. These southern Utah generating facilities include the Carbon, Hunter, Huntington, and Carrant Creek power plants. The Rocky Mountain Power transmission system that provides electrical service to this area from southern Utah presently consists of two 345kV lines from the Huntington and Castle Dale (Emery Substation) areas to the Spanish Fork and Camp Williams substations, four 345kV lines from the Mona area to the Camp Williams Substation, and two smaller 138kV lines from the Helper area (Carbon Substation) to the Spanish Fork Substation. These transmission lines are also used to meet other Rocky Mountain Power transmission commitments required between Arizona or Nevada and northern Utah. Reliability benefits would be provided by utilizing a separate corridor than the Mona – Camp Williams corridor in case of unscheduled outages or planned outages. Combined with back-up transmission capacity from the north, the Project transmission line can mitigate loss of load service due to outages occurring in the Mona – Camp Williams corridor or north of the Wasatch Front.

12. As northern Utah's electrical usage continues to grow, existing transmission lines will not have sufficient capacity to serve this projected load and ensure an adequate and reliable electric supply to northern Utah. While the addition of new generation facilities in northern Utah, such as the Lake Side generating plant, will relieve some potential stress on transmission lines between northern and southern Utah, the addition of such a generating plant in a highly-populated area may experience operating

restrictions due to environmental restrictions, such as those designed to regulate air quality standards.

13. Alternatives to constructing a new transmission line have been given serious consideration by the Company, but none were found that met the purpose and need of the Project. These included: (1) electric load and demand-side management and energy conservation, (2) new generation facilities within the Wasatch Front, (3) providing increased supply by adding additional capacity to existing transmission lines and alternative transmission technologies.

14. The Mona-Oquirrh transmission upgrade has been identified in the 2008 IRP as part of the Energy Gateway Transmission Expansion Project. For the 2007 IRP, the Mona-Oquirrh upgrade was incorporated as part of a transmission expansion option included in the IRP capacity expansion optimization model. The transmission expansion option was selected by the model under various input scenarios, and was subsequently included as part of the 2007 IRP preferred portfolio of resources.

15. The Project is part of a larger project entitled the “Energy Gateway Transmission Expansion Project,” which includes Gateway West, Gateway South, and Gateway Central. The recently approved Populus-to-Terminal transmission project (approved in Report and Order, Docket No. 08-035-42, September 4, 2008) was part of the Gateway Central Part of this project. The Mona-Oquirrh project is part of Gateway Central. These coordinated projects represent a long-term effort by the Company to deliver network resources to loads, to support retail load growth, and improve reliability of the power grid, all of which is beneficial to Rocky Mountain Power customers as a whole.

16. The Mona–Oquirrh Project is included in the regional Western Electric Coordinating Council planning and ratings process as part of the Energy Gateway Transmission Expansion Project.

17. Even though the country is in the midst of an economic recession at this time, all long-range forecasts for the Wasatch Front demonstrate that Utah and the Wasatch Front will continue to grow at a rapid pace. As Dr. Zenger indicated her testimony in the Populus-to-Terminal case, there are less than three million Utah residents right now; however, estimates from the Governor’s Office of Planning and Budget indicate that by 2017 there will be 3.5 million Utah residents growing to 4.3 million by 2030. (Zenger Direct, at 24). Despite conservation efforts by the Company and the public, it is clear that additional transmission capacity is necessary for the Company to meet the load growth over the foreseeable future.

18. Rocky Mountain Power has the capability to finance the Mona - Oquirrh and has a debt-to-equity ratio which provides for financial stability.

19. The Company will demonstrate that the present and future public convenience requires the construction of the Mona-Oquirrh line as described herein as and as will be described in greater detail in testimony. The proposed line does not constitute an extension into the certificated service territory of any existing public electric utilities.

WHEREFORE, Rocky Mountain Power requests:

- a. The Commission enter an order opening a docket for the Application to be filed in the future by the Company for a CPCN to construct the Mona-Oquirrh line, that its order allow interested parties to intervene in this

matter subject to the standards of intervention, and that the order allow the parties hereto to immediately engage in discovery.

b. The Commission enter a protective order (the Company will file a motion for such an order within the next few days).

RESPECTFULLY SUBMITTED: June 30, 2009.

R. Jeff Richards
Rocky Mountain Power

Ted D. Smith
Stoel Rives LLP

Attorneys for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **ROCKY MOUNTAIN POWER'S NOTICE OF INTENT TO FILE APPLICATION FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY** was served upon the following persons by email at the addresses shown below on June 30, 2009:

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