



201 South Main, Suite 2300
Salt Lake City, Utah 84111

August 11, 2009

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Attention: Julie P. Orchard
Commission Secretary

Re: Advice No. 09-14 – Stipulation in Docket No. 08-035-38
Low Income Lifeline Program

Pursuant to the Rate Design Stipulation in Docket No. 08-035-38, Rocky Mountain Power hereby submits for filing an original and ten copies of proposed Schedules 3 and 91 of Tariff P.S.C.U. No. 47.

Second Revision of Sheet No. 3.2	Schedule 3	Low Income Lifeline Program
First Revision of Sheet No. 3.3	Schedule 3	Low Income Lifeline Program
First Revision of Sheet No. 3.4	Schedule 3	Low Income Lifeline Program
Third Revision of Sheet No. 91	Schedule 91	Surcharge to Fund Low Income Lifeline Program

The reference in the rate design stipulation in Docket 08-035-38 related to the Low Income Lifeline Program is as follows:

17. Schedule 3. The Company agrees to hold discussions with Parties concerning a proposal to increase the Schedule 3 low income lifeline credit by at least an amount equal to the increase in the residential customer charge stipulated herein. The Company agrees to file an application with the Commission for approval for such proposal within 60 days from the date the Commission issues an order approving this Stipulation, if approval is granted.

In accordance with the Stipulation, Rocky Mountain Power representatives met with interested parties to discuss an increase to Schedule 3 on July 13, 2009 and a follow-up conference call was held on August 5, 2009. The Company requests an increase in the monthly Schedule 3 credit to \$11 per month, based on these discussions. This is an increase in the credit of \$3 per month, greater than the \$1 increase to the residential customer charge effective June 16, 2009.

Attached is a table that summarizes the proposed revisions by schedule to the Schedule 91 Surcharge. The proposed surcharge amounts are estimated to collect \$4,088,056

annually which includes a payment of up to \$50,000 to the Utah Department of Community and Culture to cover their actual costs incurred in qualifying households as income eligible. Column 4 illustrates the current monthly surcharge by schedule and column 6 shows the proposed monthly surcharge. The collection rate is calculated using projected calendar year 2010 recipients of energy assistance from the Utah Home Energy Assistance Target (HEAT) Program. The estimate of recipients is based on anticipated eligibility for households with incomes at or below 150% of federal poverty guidelines.

The recently passed SB 75 gives the Commission the authority to approve a low income assistance program. Section (5)(c)(i) of the bill states that the surcharge “shall be calculated as an equal percentage of revenues from all rate schedules.” Further, paragraph (5)(c)(ii) indicates that the monthly surcharge “may not exceed \$50 per month for any customer, adjusted periodically as the commission determines appropriate for inflation.” The proposed surcharge was calculated as described above and includes a monthly customer cap of \$50.

The proposed revisions to Schedule 3 include:

1. An increase in the maximum monthly lifeline credit to \$11.00.
2. A revision to paragraph 1 under Special Conditions to allow income eligibility to mirror the income guidelines used for the Utah HEAT Program which are determined by the Utah Department of Community and Culture.
3. The correction of a typographical error in paragraph 6 under Special Conditions. The Commission Rule referenced should be R746-200-7(D).

Rocky Mountain Power submits that the proposed Schedule 3 and Schedule 91 be effective November 1, 2009. This date coincides with the launch of the 2009/2010 HEAT Program period.

It is respectfully requested that all formal correspondence and Staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 800
Portland, OR 97232

Informal inquiries may be directed to Dave Taylor at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation