



State of Utah
Department of Commerce
Division of Public Utilities

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MEMORANDUM

To: Utah Public Service Commission

From: Division of Public Utilities
Philip Powlick, Director
Artie Powell, Manager, Energy Section
Joni Zenger, Technical Consultant

Subject: Correspondence from Rocky Mountain Power in the Matter of the Acknowledgment of PacifiCorp's Integrated Resource Plan, Docket No. 09-2035-01.

Date: March 25, 2009

Rocky Mountain Power (Company) notified the Utah Public Service Commission (Commission) on March 19, 2009 that the Company will file its next Integrated Resource Plan (IRP) on May 29, 2009. In a cover letter dated June 11, 2008, the Company had originally informed the Commission that the 2008 IRP would be filed on March 31, 2008.

At a March 19 teleconference (referenced by the Company as "a discussion with the Division"), the Division did indicate that it would need at least 30 days to provide informal comments to the Company. However, the Division recommended that the Company file its 2008 IRP on March 31, 2009 as planned, in that the Company's load forecast and other data used in the IRP would be out-of-date should the Company delay the filing. At that time, the Company told the Division, the Commission staff, and the Committee (all of whom were represented at the teleconference) that it would be filing its draft 2008 IRP on April 6, 2009. Again, the Division expressed its preference to have the IRP filed by the March 31 deadline and shorten or eliminate

the time for parties to review and provide informal comments to the Company on the draft before the formal IRP filing with the Commission.

A consensus between the Division and Committee emerged to waive the informal comment period and have the Company file the IRP with the Commission as soon as possible. The Commission could then establish a procedural schedule to solicit formal comments from the Utah Parties. This position was communicated to the Company in the above-referenced phone conference on March 19. Therefore, the Division recommends that the Commission order a procedural schedule consistent with this position. Namely, the Division recommends forgoing the informal comment period proposed by the Company and require the Company to file the IRP with the Commission on April 6, 2009, for formal review. The Division also recommends that the Commission establish a formal comment period of at least 30 days from the filing date.

The Company's proposed schedule is, in the Division's opinion, unreasonable. Under the Company's proposed schedule, a Commission order on the IRP would not be forthcoming before July, seven months into 2009 when, according to past Commission orders, the Company should be preparing its IRP update. By the time the Commission's order is issued under the Company's schedule, the IRP will be outdated. Thus, similar to the Division's recommendation with the 2007 IRP when it too was delayed, the Division recommends moving on to the IRP Update so that it can be filed in a timely manner.

On a related issue, in its March 19, 2009 letter to the Commission, the Company stated that it "still intends to keep March 31 of each odd-numbered year as the permanent filing date for its IRP." The Division opposes this filing schedule for the IRP and, supposedly, for the off-year IRP Updates. As the Division has previously stated, we recommend that the Company be required to file its IRP and subsequent updates no later than January 1. For example, the 2008 IRP update, which the Company should be working on now, should be filed no later than January 1, 2010. The 2010 IRP should be filed no later than January 1, 2011. This schedule will help

ensure that the IRP and its updates are timely and beneficial to the Company, regulators and other interested parties.

cc: Michele Beck, Committee of Consumer Services
Dave Taylor, PacifiCorp