

PAUL H. PROCTOR (#2657)
Assistant Attorney General
Utah Office of Consumer Services
Mark L. Shurtleff (#4666)
Attorney General
160 East 300 South
P.O. Box 140857
Salt Lake City, Utah 84114-0857
Telephone (801) 366-0552

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Electric Service Agreement between Rocky Mountain Power and Milford Wind Corridor Phase I, LLC.	Docket No. 09-035-55
In the Matter of the Application of ROCKY MOUNTAIN POWER for Approval of Electric Service Agreement Between Rocky Mountain Power and Milford Wind Corridor II, LLC.	Docket No. 11-035-17

UTAH OFFICE OF CONSUMER SERVICES' APPEARANCE, REQUEST FOR NOTICE and RESPONSE TO MILFORD WIND CORRIDOR PHASE I, LLC AND MILFORD WIND CORRIDOR PHASE II, LLC MOTIONS FOR INTERIM ORDERS OR ALTERNATIVE RELIEF

I. APPEARANCE.

Pursuant to Utah Code 54-10a-301 and Administrative Rule R746-100-5, the Utah Office of Consumer Services enters its appearance in this docket. The Office requests that the Commission and all parties provide copies of all pleadings, filings and correspondence with other parties and the Commission, and notice of all matters, hearings or conferences in this docket to:

Paul H. Proctor
Assistant Attorney General
160 East 300 South, 5th Floor
P.O. Box 140857
Salt Lake City, Utah 84114-0857
Telephone (801) 366-0552
pproctor@utah.gov

and

Michele Beck
Cheryl Murray
Utah Office of Consumer Services
160 East 300 South, Suite 200
PO Box 146782
Salt Lake City, UT 84114-6782
Telephone (801) 530-6957
mbeck@utah.gov
cmurray@utah.gov.

The Office and Assistant Attorney General request service of any and all documents or notices by electronic mail to the e-mail address provided above, in accordance with Rule 5, Utah Rules of Civil Procedure, as provided by Utah Admin. Code R. 746-100-1 (C).

II. RESPONSE TO MOTIONS.

The Office has reviewed Rocky Mountain Power's motion for approval of an amendment to the electric service agreement that was approved in Docket No. 09-035-55. The Office has reviewed Rocky Mountain Power's application for approval of a second electric service agreement in Docket No. 11-035-17. The Office has also reviewed and with counsel for Milford Wind, discussed Milford Wind's motions for interim relief or in the alternative, expedited hearings upon the motion to amend and application for approval.

The Office and its assigned Assistant Attorney General are not available to as participate at the January 26, 2011 hearing on Milford Wind's motions. However, from the motions and information provided by Milford Wind's counsel, the Office has concluded that Milford Wind is entitled to expedited consideration of the motions for interim relief. Further, the Office has concluded that granting Milford Wind interim relief as requested is in the public interest. The Office has not identified within the pleadings filed by Milford Wind and Rocky Mountain Power, any substantial grounds for opposing interim relief.

The Office's position upon interim relief is conditioned upon the Commission considering the merits of Rocky Mountain Power's motion for approval of an amendment to the electric service agreement in Docket No. 09-035-55, and application for approval of a second electric service agreement in Docket No. 11-035-17, only in regular proceedings to be scheduled and conducted in accordance with the Commission's procedures and practices.

DATED this 26th day of January 2011.

Paul H. Proctor
Assistant Attorney General
Utah Office of Consumer Services

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January 2011, I caused to be sent by electronic mail, a true and correct copy of the foregoing Appearance and Response to Milford Wind Corridor Phase I and II Motions to:

William J. Evans
Parsons Behle & Latimer
One Utah Center
201 South Main Street, Suite 1800
Salt Lake City, UT 84111

Patricia Schmid
Felise Thorpe Moll
ASSISTANT ATTORNEY GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov
fthorpemoll@utah.gov

Mark Moench
Barbara Ishimatsu
Daniel E. Solander
ROCKY MOUNTAIN POWER
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
Mark.Moench@PacifiCorp.com
Barbara.ishimatsu@pacificorp.com
Daniel.Solander@pacificorp.com

Paul H. Proctor
Assistant Attorney General