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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp's 2011 Integrated Resource Plan	DOCKET NO. 11-2035-01 Response of Western Resource Advocates and Utah Clean Energy to Rocky Mountain Power's filing and withdrawal of its 2011 IRP Revised Action Plan
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On January 31, 2012, PacifiCorp, as Rocky Mountain Power (“the Company”), filed a revision to the 2011 Integrated Resource Action Plan. The cover letter asked the Commission to acknowledge the 2011 Integrated Resource Plan (IRP) based on the Revised Action Plan. Pursuant to R746-430-1(2)(a), this Commission published notice of a scheduling conference to establish a comment period. On February 2 the Company filed a second letter indicating that it had filed the Revised Action Plan “for informational purposes only” and requested that the Commission “continue to consider acknowledgment of the 2011 IRP based on the original Action Plan filed within the 2011 IRP.” The following day, February 3, PacifiCorp filed a letter

withdrawing the Revised Action Plan for consideration, noting its intent to re-submit the Plan as part of its 2011 IRP Update and reiterating its request that the Commission consider acknowledgment of the 2011 IRP based on the originally-filed Action Plan. On February 6, the Commission canceled the previously noticed scheduling conference.

The Revised Action Plan contains some significant changes to the 2011 IRP Action Plan. Action Items 1 through 11 all contain substantive changes. Some of the significant changes include the following: the creation of an independent Technical Review Committee to oversee the next wind integration study; a study of grid flexibility for accommodating variable energy resources; the re-evaluation and potential deferral of a 2016 combined cycle combustion turbine natural gas resource; enhancements to the detail of DSM resource action items; and an extensive list of commitments with regard to coal plant utilization/retirement analysis, including an updated Coal Replacement Study. The revisions contained in the Revised Action Plan should have been incorporated into the 2011 IRP as filed in March of 2011.

These changes appear to address issues raised throughout the public input process as well as some of the issues Western Resource Advocates (“WRA”) and Utah Clean Energy (“UCE”) specifically presented in Comments on the filed 2011 IRP. Because the changes articulated in the Revised Action Plan address some concerns WRA, UCE, and others made in comments on the 2011 IRP, the content of the Company’s Revised Action Plan reinforces our position that the Commission should not acknowledge that 2011 IRP.

Although the Company withdrew its Revised Action Plan filing, WRA and UCE hereby request that the Commission take notice of the Revised Action Plan to the extent that it demonstrates the weaknesses of the 2011 IRP Action Plan, and provides support for *not* acknowledging PacifiCorp’s 2011 IRP.

RESPECTUFULLY SUBMITTED this 20th day of March, 2012.

WESTERN RESOURCE ADVOCATES

/s/ _____

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 20th day of March, 2012, on the following:

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