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*Attorney for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Rocky Mountain Power for Approval of an Electric Service Agreement between Rocky Mountain Power and Kennecott Utah Copper LLC.	DOCKET NO. 12-035-94
In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Kennecott Utah Copper LLC	<b>REPLY COMMENTS OF ROCKY MOUNTAIN POWER</b>
In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Kennecott Utah Copper LLC	DOCKET NO. 12-035-95
	<b>REPLY COMMENTS OF ROCKY MOUNTAIN POWER</b>
	DOCKET NO. 12-035-96
	<b>REPLY COMMENTS OF ROCKY MOUNTAIN POWER</b>

Pursuant to the Scheduling Order in this Docket issued by the Public Service Commission of Utah (“Commission”) September 20, 2012, Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or the “Company”), hereby respectfully submits these reply comments.

**Comments**

1. On October 29, 2012, the Utah Division of Public Utilities (“DPU”) filed comments in Docket No. 12-035-94, Docket No. 12-035-95 and Docket No. 12-035-96. In their memos addressing the Power Purchase Agreement (Smelter) and the Power Purchase Agreement

(Refinery), the DPU recommended the Commission approve the power purchase agreements subject to correction of Exhibit E in each agreement. On November 15, 2012, the Company and Kennecott Utah Copper LLC entered into amendments to the respective power purchase agreements in which Exhibit E is corrected in each agreement consistent with the DPU's recommendation.

2. On October 29, 2012, the Office of Consumer Services ("OCS") filed comments in Docket No. 12-035-94. In their memo, the OCS recommends the Electric Service Agreement be approved provided the parties make a minor revision to the contract clarifying how certain charges would be applied to Kennecott. On November 15, 2012, the Company and Kennecott Utah Copper LLC entered into an amendment to the Electric Service Agreement in which the Electric Service Agreement is revised consistent with the recommendation of the OCS.

3. All issues raised by the DPU and OCS in their memos have been resolved through execution of amendments to the Electric Service Agreement, the Power Purchase Agreement (Smelter), and the Power Purchase Agreement (Refinery).

In conclusion, the Company recommends that the Commission approve the 1) Electric Service Agreement as amended, 2) Power Purchase Agreement (Smelter) as amended, and 3) Power Purchase Agreement (Refinery) as amended.

DATED: November 20, 2012

Respectfully submitted,

ROCKY MOUNTAIN POWER

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Daniel E. Solander  
Rocky Mountain Power

## CERTIFICATE OF SERVICE

I hereby certify that on this 20<sup>th</sup> day of November, 2012, I caused to be served via electronic mail, a true and correct copy of the foregoing Reply Comments of Rocky Mountain

Power to the following:

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