



GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Public Service Commission

From: The Office of Consumer Services
Michele Beck
Cheryl Murray

Copies To: Rocky Mountain Power
Dave Taylor
Division of Public Utilities
Chris Parker, Director

Date: March 22, 2013

Subject: Docket No. 13-035-T04. Advice No. 13-04. Electric Service Regulation No. 12, Line Extension.

On February 28, 2013, PacifiCorp (Company) filed with the Public Service Commission (Commission) an application for approval to revise Electric Service Regulation No. 12 -- Line Extension.

On March 22, 2013, in response to a Commission issued Action Request the Division of Public Utilities (Division) filed its recommendation for approval of proposed revisions to Regulation 12.

The Office of Consumer Services (Office) has reviewed the Company's filing and the Division's recommendation for approval. Based on our review the Office also recommends that the Commission approve the requested revisions to Electric Service Regulation No. 12.

The Office also notes that it was not served directly¹ with this filing. The cover letter posted on the Commission's website does not include a service list or a "cc" note at the end so it is not clear whether any other potentially interested parties were aware of this proceeding. The Commission may want to consider articulating more direct service list requirements for tariff filings to ensure that interested parties have the opportunity to participate.

¹ The Office is not aware whether the Attorney General's office was served on behalf of the Office. However, the Office notes that not only is it currently experiencing a transition in representation but in general the role played by counsel from the Attorney General's office is not the same as private counsel for other parties. In order to serve a state agency with copies of filings and other documents, it needs to be delivered directly to the office. Typically Rocky Mountain Power and other utilities follow that practice.