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Counsel for Energy Freedom Coalition of America

**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Investigation of the
Costs and Benefits of PacifiCorp's Net
Metering Program

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**Docket No. 14-035-114
MOTION TO DEVIATE FROM
ELECTRONIC FILING
REQUIREMENT**

The undersigned, representing Energy Freedom Coalition of America ("EFCA") ("Movant") hereby moves the Public Service Commission of Utah ("Commission") for permission to deviate from the electronic filing requirement set forth in Utah Admin. Code R746-1-203. Pursuant to Utah Admin. Code R746-1-109(2), movant attests that the rule imposes a hardship, under the current circumstances, that outweighs the benefits of the rule. Movant attests that:

1. Movant is submitting non-confidential direct testimony in this docket, but its witness has prepared workpapers that utilize material that has been designated by Rocky

Mountain Power as requiring confidential treatment under former Utah Admin. Code R746-100-16 (now Utah Admin. Code R746-1-601).

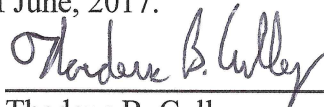
2. Movant began undertaking steps to establish the capability to utilize the Commission's new SFTP system on June 5, 2017, including a call to Commission staff, and was previously unaware of the one to two week delay involved in Commission processing of requests for access to the uploading system.

3. Given the estimated processing time of one to two weeks to enable filing of confidential materials on the SFTP system, movant is unable to establish SMTP capability by June 8, 2017 and will submit all confidential workpapers on a CD to be delivered on this day to the Commission.

4. Movant only requires a waiver to enable filing of workpapers in support of its direct testimony in this proceeding and will be fully enabled to comply with the Commission's electronic filing requirements for confidential materials going forward.

WHEREFORE, Movant requests that the Commission grant this limited, one-time waiver for the reasons stated herein.

Respectfully submitted this 8th day of June, 2017.



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CERTIFICATE OF SERVICE

I hereby certify that I will cause a true and correct copy of the foregoing **MOTION TO DEVIATE FROM ELECTRONIC FILING REQUIREMENT** to be filed electronically with the Utah Public Service Commission on June 8, 2017 and to be served via email on that day upon the following persons:

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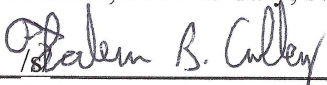
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Dated June 8, 2017 at Cary, NC.



Thad Culley