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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of a Promotional Program Pursuant to R746-404)	DOCKET NO. 14-035-_____
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**APPLICATION OF ROCKY MOUNTAIN POWER
FOR APPROVAL OF A PROMOTIONAL PROGRAM**

Rocky Mountain Power, a division of PacifiCorp, (“Rocky Mountain Power” or the “Company”), hereby requests an Order from the Public Service Commission of Utah (“Commission”) authorizing the Company to extend an existing promotional program pursuant to R746-404. The Commission’s letter, dated September 4, 2012, in Docket No. 12-035-91, approved the addition of Special Condition 6 to Schedule 70, Renewable Energy Rider - Optional, attached hereto as Exhibit A. The Company inadvertently did not file an updated tariff in Docket No. 12-035-91 and now respectfully requests: 1) a retroactive effective date of September 4, 2012 for the tariff approved in Docket No. 12-035-091; and 2) authorization to indefinitely extend the promotional program offerings, as described in the previously approved tariff language. In support of this Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a division of PacifiCorp. PacifiCorp is an Oregon corporation that provides electric service to retail customers through its Rocky Mountain Power division in the states of Utah, Wyoming, and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately 840,000 customers in Utah. Rocky Mountain Power's principal place of business in Utah is 201 South Main Street, Suite 2300, Salt Lake City, Utah 84111.

2. Rocky Mountain Power files this Application pursuant to Rule R746-404 of the Public Service Commission of Utah, under which the Company is required to file an application for approval of promotional programs 30 days before they are to be put into effect.

3. Communications regarding this Application should be addressed to:

Paul Clements
Director, Regulatory Affairs and Revenue Requirement
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
Telephone: (801) 220-4470
E-mail: paul.clements@pacificcorp.com

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E-mail: daniel.solander@pacificcorp.com

In addition, PacifiCorp respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Dave Taylor at (801) 220-2923.

4. As part of Rocky Mountain Power's voluntary Blue Sky renewable energy program, the Company requests approval to extend the use of promotional concessions in conjunction with current marketing efforts. As previously approved by the Commission, the promotional concessions consist of thank you gifts ("promotional gifts"), valued at \$25 or less, and are offered to customers who enroll in the program. The total costs for the promotional gifts will not exceed \$10,000 annually. Examples of such items include, but are not limited to, Blue Sky branded merchandise such as water bottles, travel mugs, re-usable shopping bags and gift certificates to businesses participating in the Company's Blue Sky program. The Company believes that such promotional gifts are an effective outreach tactic and will continue to aid the Company's efforts to increase awareness and participation in the Blue Sky renewable energy program.

5. Further, the Company believes that marketing the program through promotional concessions is in alignment with the intent of MidAmerican Energy Holdings Company merger commitment 23 (Docket No. 05-035-54) which states:

PacifiCorp will continue a Blue Sky tariff offering in all states. PacifiCorp will continue to support this offering through innovative marketing, by modifying the tariff to reflect the developing green power market and by monitoring national certification standards (emphasis added).

6. In the Company's experience, marketing programs that include promotional gifts often yield a lower cost per participant when compared to campaigns without the offer of a promotional gift. Additionally, the Company believes the benefits of the promotional gifts include: (1) increased awareness and understanding of the Blue Sky program; (2) positive impressions on prospective participants; (3) increased participation in the program; (4) enhanced pride and identity for existing participants; (5) improved participant retention; (6) improved customer acquisition costs; and (7) increased support for renewable energy.

7. Provided below are examples of how the Company will continue to utilize the concessions in marketing campaigns if an extension is approved by the Commission:

Outreach at Community Events

The Company sets up Blue Sky informational booths at community events to educate customers about the Blue Sky program and to increase enrollment. Promotional gifts, such as a Blue Sky branded water bottle, are displayed at the Company's booth during a community event and offered to customers who enroll. The Company has found that displaying promotional gifts during outreach events generates traffic to the Blue Sky program booth, which leads to enhanced customer awareness and ultimately results in increased program enrollment.

Paper and Electronic Campaign

The Company utilizes several paper and electronic methods to educate customers about the Blue Sky program and to boost enrollment. Offers for the promotional gifts would continue to be included in the marketing message to incent customers to enroll.

Nonprofit Partnerships

The Company may use the promotional gifts to implement a marketing campaign that would partner with regional nonprofit organizations that support renewable energy. Under this campaign, the partner nonprofit would endorse the Blue Sky program to their constituents. When a partner nonprofit's constituent enrolls in the Blue Sky program as a part of this campaign, the Company would provide a de minimis donation to the partner nonprofit.

Such an arrangement would allow the Company to target customers whose values align with the mission of the Blue Sky program while supporting renewable energy in the region.

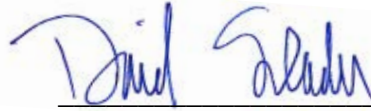
8. In Summary, the Company requests approval to continue the use of promotional gifts, valued at \$25 or less, not to exceed a total of \$10,000 in a given year, that would be offered to customers who enroll in the program. The Company believes that such promotional gifts are an effective tool to increase awareness and participation in the Blue Sky renewable energy program.

WHEREFORE, Rocky Mountain Power respectfully requests an order approving:

- (1) a retroactive effective date of September 4, 2012, for the current tariff to reflect the previously approved Tariff Section 6, attached hereto as Exhibit A; and
- (2) the continued use of promotional concessions in the form of thank you gifts to customers who enroll in the Company's voluntary Blue Sky renewable energy program, as described in this Application.

DATED: November 19, 2014.

Respectfully submitted,



Daniel E. Solander
Attorney for Rocky Mountain Power