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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Voluntary Request of Rocky Mountain Power for Approval of Resource Decision and Request for Accounting Order</p>	<p>Docket No. 14-035-147</p> <p>RESPONSE TO UTAH OFFICE OF CONSUMER SERVICES' MOTION TO COMPEL DISCOVERY AND REQUEST FOR ORDER COMPELLING DISCOVERY</p>
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Pursuant to Utah Administrative Code R746-100-4(D), Rocky Mountain Power (the “Company” or “Rocky Mountain Power”) hereby responds to the Motion to Compel filed by the Utah Office of Consumer Services (“Office”) with the Public Service Commission of Utah (“Commission”) February 13, 2015 regarding Rocky Mountain Power’s refusal to provide

information responsive to the Office's Data Request 1.10 served on Rocky Mountain Power December 23, 2014.

The Company objected to producing the information the Office is seeking under Data Request 1.10 based on its obligations under the Confidentiality Agreement between the Company and the United Mine Workers of America ("UMWA"), dated October 13, 2013 ("Confidentiality Agreement"). The relevant portion of the Confidentiality Agreement states as follows:

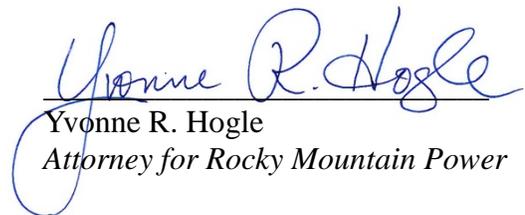
The Receiving Party agrees to promptly notify the other Party of any inquiry or demand made by any third party or any governmental agency or authority or any inquiry or demand made as a result of any administrative or judicial proceeding wherein an answer to the same would divulge or tend to divulge any Discussion and/or Disclosure. The Receiving Party shall not reveal any such Discussion and/or Disclosure in response to any such inquiry or demand unless required to do so by compulsory process of a court, administrative agency or other governmental body. Prior to any such revelation, the Receiving Party shall allow the other Party a reasonable opportunity to secure confidential treatment of any such Discussion and/or Disclosure by such court, administrative agency or other governmental authority and shall cooperate with the other Party in such effort or in any other effort by the other Party to object in any manner to the revelation of such Discussion and/or Disclosure.

On multiple occasions, the Company reached out to Mr. Brian Sanson of the UMWA regarding the Office's Data Request 1.10. Among other things, the Company indicated that it was acting in accordance with the Confidentiality Agreement and was seeking permission to disclose the information. The Company further indicated that the information would be protected under Confidentiality Rules R346-100-16. Finally, the Company also provided the Motion to Compel to UMWA with the rules containing responsive deadlines. The Company has received no response from UMWA's representative, Mr. Sanson, or any other representative of the UMWA. The only time Mr. Sanson communicated with the Company was to request from the company a copy of the application along with Data Request 1.10, which the Company provided.

Pursuant to the Confidentiality Agreement, the Company cannot produce the information responsive to the Office's Data Request without permission from the UMWA or compulsory process of the Commission. The Company does not oppose the Motion and is prepared to produce the information if the Commission grants the Office's Motion, subject to and without waiving any objections as to the admission of the information into the record.

Dated this March 2, 2015.

RESPECTFULLY SUBMITTED


Yvonne R. Hogle
Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of March, 2015, a true copy of the foregoing document was sent via email to the following:

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A handwritten signature in blue ink, appearing to read "Gary A. Dodge", is written over a horizontal line.