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State of Utah
Department of Commerce
Division of Public Utilities

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Memorandum

TO: Public Service Commission

FROM: Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Bob Davis, Utility Analyst
Joni Zenger, Technical Consultant

DATE: December 1, 2014

SUBJECT: 14-035-T13 TARIFF In the Matter of Rocky Mountain Power's Proposed Revisions to Electric Service Schedule No. 4, Pole Attachments.

Recommendation (APPROVAL)

The Division of Public Utilities (Division) has reviewed Rocky Mountain Power's (RMP or Company) Advice No. 14-11 Tariff P.S.C.U. No. 50 of PacifiCorp, dba Rocky Mountain Power, applicable to electric service in the State of Utah – Pole Attachments, and finds that it meets the Public Service Commission's (Commission) reporting requirements of R746-405-2 (D) and that the proposed tariff sheets do not constitute a violation of State Law or Commission Rule.

After analysis, the Division finds no outstanding issues at this time with the revised Schedule No. 4 – Pole Attachments and recommends the Commission approve the Company's tariff revised Schedule No. 4 – Pole Attachment.

Issue

On November 25, 2014, the Commission issued an Action Request to the Division requesting an investigation of the filing and to provide analysis, evaluation of results, and conclusions as a basis for recommendations regarding the filing. The Commission asked the Division to report back by December 10, 2014.

Discussion

In its November 21, 2012 Report and Order in Docket No. 10-035-97 the Commission approved the inclusion of a Schedule of Non-Recurring Fees in Electric Service Schedule No. 4, Pole Attachments. On December 3, 2012, the Company submitted a compliance filing which included the ordered changes to Schedule 4 which was subsequently acknowledged by the Commission.

In the Company's compliance filing in the 2014 General Rate Case, Docket 13-035-184, however, the Schedule of Non-Recurring Fees was inadvertently left out of the Schedule 4 tariff sheet. This filing returns the previously approved Schedule of Non-Recurring Fees to Schedule No. 4.

The Division reviewed the 10-035-97 Report and Order issued on November 21, 2012 by the Commission specifically Section IV, Fees, [A] Application Fee, [B] Unauthorized Attachment Fee and [C] Other Miscellaneous Fees. The Division found no inconsistencies between that document and the Company's claims for this filing.

The Division reviewed a previous Action Request filed on December 21, 2012 where it reviewed the Company's December 3, 2012 compliance filing regarding the Company's revised and updated Schedule 4 "Safe Harbor" Pole Attachment Agreement and Rates as filed with the Commission. The Division found no inconsistencies between that document and the Company's claims for this filing.

Conclusion

The Division has reviewed the Company's Advice No. 14-11 Tariff P.S.C.U. No. 50 of PacifiCorp, dba Rocky Mountain Power applicable to electric service in the State of Utah – Pole Attachments, and finds that it meets the Commission's reporting requirements found in R746-405-2 (D) and that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Division reviewed the November 21, 2012 Report and Order for Docket No. 10-035-97 issued by the Commission and the Company's December 3, 2012 compliance filing regarding "Safe Harbor" Pole Attachments and Rates. With no other outstanding issues at this time, the Division recommends that the Commission approve the Company's revised tariff Sheet No. 4 – Pole Attachments.

CC Jeffrey K. Larsen, RMP
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Michele Beck, OCS