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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**In the Matter of a Request for Agency
Action to Review the Carrying
Charges Applied to Various Rocky
Mountain Power Account Balances**

Docket No. 15-035-69
**REPLY COMMENTS OF THE UTAH
ASSOCIATION OF ENERGY USERS**

The Utah Association of Energy Users (“UAE”) files these comments in response to comments filed in this docket by Rocky Mountain Power (“RMP”). UAE did not file direct comments because it largely concurs with the recommendations of the Division of Public Utilities (“Division”). The Office of Consumer Services, Utah Clean Energy and the Southwest Energy Efficiency Project filed comments in support of the Division’s recommendation, while RMP filed comments in opposition, proposing instead to use its authorized cost of long-term debt.

UAE submits that carrying costs should be reasonably reflective of risk, and disagrees with any claim that RMP’s cost of long-term debt is appropriately reflective of such risk. Rather, a short-term debt rate or a corporate interest rate is better reflective of the realistic repayment risk faced by RMP. UAE thus supports the Division’s proposal for the use of an average of corporate interest rates.

DATED this 2nd day of December 2015.

HATCH, JAMES & DODGE

/s/

Gary A. Dodge
Attorneys for UAE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 2nd day of December 2015 on the following:

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