

March 10, 2017

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

Re: Reply Comments  
In the Matter of the Application of Rocky Mountain Power to Extend the 2017  
Protocol through December 31, 2019—Docket No. 17-035-06

On February 8, 2017, the Public Service Commission of Utah (“Commission”) issued a Scheduling Order in the above referenced matter, allowing parties to file comments by March 3, 2017, and responsive comments by March 10, 2017. The Division of Public Utilities (“DPU”), Office of Consumer Services (“OCS”), Utah Association of Energy Users (“UAE”), and Sierra Club (collectively, the “Parties”), filed comments on March 3, 2017. Rocky Mountain Power (“Company”) provides these reply comments in response to the Parties’ comments.

**BACKGROUND**

On February 1, 2017, PacifiCorp, dba Rocky Mountain Power (the “Company”) filed its Application to Extend the 2017 Protocol through December 31, 2019, as contemplated by the 2017 Protocol Agreement. The Company stated that, although stakeholders have reengaged in multi-state protocol discussions and are reviewing alternatives, it seems unlikely that the parties will be able to reach consensus on a new proposal with adequate time for consideration by the Commission in time for approval before December 31, 2018, when the 2017 Protocol is currently schedule to expire.

On March 3, 2017, DPU, OCS, UAE, and Sierra Club filed comments. The DPU recommended that the Commission approve the request to extend the 2017 Protocol through the end of December 2019, provided that all required approvals for the extension are forthcoming. In the event of one or more of the states denies the extension, the DPU recommended that the Commission adopt a defined rolled-in (or other reasonable) cost allocation method for reporting purposes and for purposes of establishing Utah’s revenue requirement. The OCS recommended approval of the extension, contingent upon approval from all other state commissions that approved the 2017 Protocol. UAE does not object to the extension so long as all the other states that approved the 2017 Protocol similarly extend it without any substantive changes. Sierra Club recommends that the Commission use this proceeding, or open another proceeding for discussions about proposed changes to the 2017 Protocol.

**RESPONSIVE COMMENTS**


Rocky Mountain Power appreciates the support of the parties that filed comments recommending approval of the application as filed. The Company's request is for approval of the one year extension of the 2017 Protocol, with no substantive changes. This position directly supports the language contained within the 2017 Protocol, which required interdependency among commission approvals of the 2017 Protocol.

As stated in the Company's application for the extension, the Multi-State Process ("MSP") is an ongoing, public process. The Company is committed to continued evaluation of alternative inter-jurisdictional allocation methods, and the Company believes that the process that is currently in place is the proper forum for continuing to work with stakeholders on these issues. Accordingly, the Company respectfully requests the Commission reject Sierra Club's proposal to use this proceeding, or open another proceeding for discussions about changes to the 2017 Protocol.

**CONCLUSION**

For the reasons set forth in the Company's Application in this docket, and in its reply comments, the Company respectfully requests that the Commission approve the Application and extend the terms of the 2017 Protocol through December 31, 2019, with a decision prior to March 31, 2017.

Sincerely,



Jeffrey K. Larsen  
Vice President, Regulation

cc: Service List – Docket No. 17-035-06

**CERTIFICATE OF SERVICE**

**Docket No. 17-035-06**

I hereby certify that on this 10<sup>th</sup> day of March, 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

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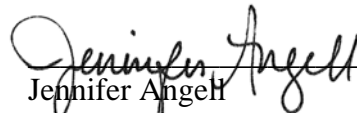
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