

January 12, 2018

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

RE: **Docket No. 17-035-69 - Investigation of Revenue Requirement Impacts of the New Federal Tax Legislation Titled: "An act to provide for reconciliation pursuant to titles II and V of the concurrent resolution of the budget for fiscal year 2018"**

Rocky Mountain Power hereby submits for filing its response to the Motion for Orders for Deferred Accounting Treatment of Benefits Associated with 2018 Tax Reconciliation Act filed by the Utah Association of Energy Users January 2, 2018. Concurrent with the Company's response, the Company hereby submits in this filing its Application for Accounting Order to defer all revenue requirement impacts associated with the income tax provisions recently enacted by the federal government beginning January 1, 2018.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
utahdockets@pacificorp.com
jana.saba@pacificorp.com
yvonne.hogle@pacificorp.com

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

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward
Vice President, Regulation

cc: Service List

R. Jeff Richards (#7294)
Yvonne R. Hogle (#7550)
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone: (801) 220-4050
Facsimile: (801) 220-3299
Email: robert.richards@pacificorp.com
yvonne.hogle@pacificorp.com

Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)	
Investigation of Revenue Requirement)	DOCKET NO. 17-035-69
Impacts of the New Federal Tax)	
Legislation Titled: “An act to provide for)	RESPONSE TO MOTION FOR ORDERS
reconciliation pursuant to titles II and V of)	FOR DEFERRED ACCOUNTING
the concurrent resolution of the budget for)	TREATMENT OF BENEFITS
fiscal year 2018”)	ASSOCIATED WITH 2018 TAX
)	RECONCILIATION ACT
)	

Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or the “Company”), pursuant to the Public Service Commission Administrative Procedures Act Rule, R746-1-301, hereby responds to the Motion for Orders for Deferred Accounting Treatment of Benefits Associated with 2018 Tax Reconciliation Act filed by the Utah Association of Energy Users January 2, 2018 (“UAE Motion”). In support of its Response, the Company states as follows:

1. On December 21, 2017, the Public Service Commission of Utah (“Commission”) issued a Notice of Comment Period initiating this docket to investigate the revenue requirement impacts of “[the] act to provide for reconciliation pursuant to titles II and V of the concurrent resolution of the budget for fiscal year 2018” (the “2018 Tax Act”) and directing all utility companies to file written comments on or before January 31, 2018 (“Notice of Comment Period”).
2. On or about December 22, 2017, the 2018 Tax Act was enacted.
3. On or about January 2, 2018, UAE filed the UAE Motion.

4. In response to the UAE Motion the Commission issued, on January 3, 2018, its Notice Regarding the Utah Association of Energy Users' Motion for Orders for Deferred Accounting Treatment of Benefits Associated with 2018 Tax Reconciliation Act ("Notice of UAE Motion"). In its Notice of UAE Motion, the Commission requested comments on January 12, 2018 because "UAE's Motion requests a deferral period commencing January 1, 2018."¹

5. The Company supports deferred accounting of the impacts of the 2018 Tax Act,² and concurrent with this response is filing an Application for Deferred Accounting that includes the proposed accounting for the deferral. The Company initially intended to include its proposed deferral in its January 31, 2018 filing pursuant to the Notice of Comment Period. In light of the UAE Motion and the comment period set forth in the Notice of the UAE Motion, the Company has expedited this part of its filing to provide the Commission and parties its deferral application. The Company will provide the details of the estimated impacts and proposed ratemaking treatment of the 2018 Tax Act in its January 31, 2018 filing, in accordance with the Notice of Comment Period.

6. The Company requests that the Commission stay the UAE Motion until the Company's Application for Deferred Accounting, and the details thereof, are addressed.

WHEREFORE, based on the foregoing, the Company respectfully requests the Commission stay any action on the UAE Motion until the Company's Application for Deferred Accounting is resolved.

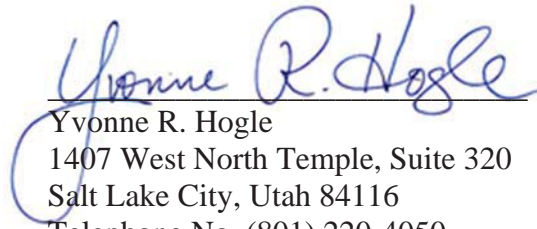
¹ Notice of UAE Motion, at 1.

² For example, upon enactment of the 2018 Tax Act, Rocky Mountain Power informally contacted each of its state commissions to inform them of its intent to defer the impacts while ratemaking treatment was developed and inquire as to the preferred course of action. In Utah, the Company was informed about the Commission's imminent issuance of the Notice of Comment Period that would set the timing for utility filings. In Wyoming, the Public Service Commission included the 2018 Tax Act on its public meeting agenda on December 28, 2017, at which the Company indicated its support for the commission's motion to defer the impacts. In the Pacific Power states, and consistent with the historical process for deferrals in those states, the Company filed deferred accounting applications on December 28, 2017.

DATED this 12th day of January, 2018.

Respectfully submitted,

ROCKY MOUNTAIN POWER



Yvonne R. Hogle
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone No. (801) 220-4050
Facsimile No. (801) 220-3299
yvonne.hogle@pacificorp.com

Attorney for Rocky Mountain Power

R. Jeff Richards (#7294)
Yvonne R. Hogle (#7550)
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone No. (801) 220-4050
Facsimile No. (801) 220-3299
yvonne.hogle@pacificorp.com

Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Investigation of Revenue Requirement Impacts)
of the New Federal Tax Legislation Titled: “An)
act to provide for reconciliation pursuant to)
titles II and V of the concurrent resolution of)
the budget of fiscal year 2018”)
)

DOCKET NO. 17-035-69

**APPLICATION FOR ACCOUNTING
ORDER**

Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or the “Company”), under Utah Code Ann. § 54-4-23, submits this application (“Application”) to the Public Service Commission of Utah (“Commission”) for an order authorizing the Company to defer all revenue requirement impacts associated with the income tax provisions enacted by the federal government “[t]o provide for reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018,” H.R. 1 (the “2018 Tax Act”), for a deferral period beginning January 1, 2018, continuing as proposed in the Company’s forthcoming January 31, 2018 filing, in which the Company will provide additional details of its proposed deferred and ratemaking treatment.

In support of this Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a division of PacifiCorp, an electrical corporation and public utility in the state of Utah and is subject to the jurisdiction of the Commission with regard to its public utility operations. PacifiCorp also provides retail electric service in the states of

Idaho and Wyoming under the name Rocky Mountain Power, and in the states of Oregon, Washington, and California under the name Pacific Power.

2. This Application is filed pursuant to Utah Code Ann. §54-4-23, which authorizes the Commission to prescribe the accounting to be used by any public utility subject to its jurisdiction.

3. Communications regarding this Application should be addressed to:

Jana Saba
Manager, Utah Regulatory Affairs
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, Utah 84116
E-mail: jana.saba@pacificorp.com

Yvonne R. Hogle
Assistant General Counsel
Rocky Mountain Power
1407 West South Temple, Suite 320
Salt Lake City, Utah 84116
E-mail: yvonne.hogle@pacificorp.com

In addition, Rocky Mountain Power requests that all data requests regarding this application be addressed to:

By email (preferred)

datarequest@pacificorp.com

By regular mail

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries related to this application may be directed to Jana Saba at (801) 220-2823.

4. The Company is filing this Application because it supports deferred accounting of the impacts of the 2018 Tax Act beginning January 1, 2018.

5. Specifically, Rocky Mountain Power proposes to record deferred amounts related to the reduction in federal corporate income tax rate in FERC Account 229—Accumulated Provision for Rate Refund, with the corresponding entry to FERC Account 449.1—Provision for Rate Refunds, and related income tax effects to FERC Account 190—Accumulated Deferred

Income Taxes, FERC Account 236—Taxes Accrued, FERC Account 409.1—Income Taxes – Utility Operating Income, and FERC Account 411.1—Provision for Deferred Income Taxes – Credit, Utility Operating income. If this application is denied, the collection of revenue requirement at the higher tax rate will remain in general business revenues (FERC Accounts 440—Residential Sales, 442—Commercial and Industrial Sales, and 444—Public Street and Highway Lighting). In addition, if this application is approved, PacifiCorp proposes to record deferred amounts related to excess deferred income tax liabilities in FERC Account 254—Other Regulatory Liabilities and FERC Account 182—Other Regulatory Assets, with offsetting amounts to FERC Account 190—Accumulated Deferred Income Taxes, FERC Account 281—Accumulated Deferred Income Taxes – Accelerated Amortization, FERC Account 282—Accumulated Deferred Income Taxes – Other Property, and FERC Account 283—Accumulated Deferred Income Taxes – Other.

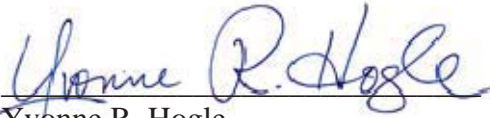
6. Rocky Mountain Power will provide additional details regarding the ratemaking and deferred accounting treatment in its January 31, 2018 filing, including an estimate of the total expected benefit.

WHEREFORE, Rocky Mountain Power respectfully requests, in accordance with Utah Code Ann. §54-4-23, the Commission issue an order authorizing the Company to defer all revenue requirement impacts associated with the income tax provisions enacted by the 2018 Tax Act in the accounts referenced above, beginning January 1, 2018.

Respectfully submitted this 12th day of January, 2018.

Respectfully submitted,

ROCKY MOUNTAIN POWER



Yvonne R. Hogle
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone No. (801) 220-4050
Facsimile No. (801) 220-3299
yvonne.hogle@pacificorp.com

Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

Docket No. 17-035-69

I hereby certify that on January 12, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Cheryl Murray cmurray@utah.gov

Michele Beck mbeck@utah.gov

Division of Public Utilities

Erika Tedder etedder@utah.gov

Assistant Attorney General

Patricia Schmid pschmid@agutah.gov

Justin Jetter jjetter@agutah.gov

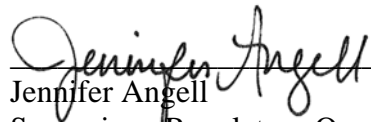
Robert Moore rmoore@agutah.gov

Steven Snarr stevensnarr@agutah.gov

Rocky Mountain Power

Data Request Response Center datarequest@pacificorp.com

Jana Saba jana.saba@pacificorp.com;
utahdockets@pacificorp.com


Jennifer Angell
Supervisor, Regulatory Operations