

April 29, 2020

***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 Administrator

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”  
***Compliance Filing***

On October 24, 2018, Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”), filed with the Public Service Commission of Utah (“Commission”) a Settlement Stipulation in the above referenced docket (“Stipulation”). The Stipulation, approved by the Commission on November 9, 2018, contained the following provision under Paragraph 39 related to the protected, property-related Excess Deferred Income Tax (“EDIT”):

39. Parties agree that the protected property-related EDIT will be normalized using the average rate assumption method (“ARAM”) as required by the Internal Revenue Code. The Utah-allocation of the actual annual amortization of protected property-related EDIT under the ARAM, grossed-up for taxes, will be placed in a regulatory liability account. Parties will be free to propose ratemaking treatment for the balance of the ARAM-related regulatory liability account in the Company’s next general rate case. The Company will provide Parties the workpapers for the calculation of the estimated annual amount at the time it files the annual results of operations report beginning April 2019, and the final amount for the preceding year in the mid-year results filed in October, until reflected in base rates in the Company’s next general rate case.

In accordance with the Stipulation, the Company hereby submits the workpapers for the calculation of the final protected EDIT amortization for the 12 months ended December 31, 2018, and the estimated protected EDIT amortization for the 12 months ended December 31, 2019. The Company is providing the final protected EDIT amortization for 2018 in this filing because of its recent adoption of the Reverse South Georgia Method (“RSGM”) to

Public Service Commission of Utah

April 29, 2020

Page 2

amortize protected EDIT as described in the Company's supplemental filing in this docket on March 25, 2020. The Company 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](mailto:datarequest@pacificorp.com)  
[Jana.saba@pacificorp.com](mailto:Jana.saba@pacificorp.com)

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

Informal inquiries may be directed to Jana Saba, Manager, State Regulatory Affairs, at (801) 220-2823.

Sincerely,



Joelle Steward  
Vice President, Regulation

cc: Service List Docket No. 17-035-69

Enclosures

## **CERTIFICATE OF SERVICE**

Docket No. 17-035-69

I hereby certify that on April 29, 2020, 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](mailto:cmurray@utah.gov)

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### **Division of Public Utilities**

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**Rocky Mountain Power**

Data Request Response Center

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A handwritten signature in black ink, appearing to read 'Mary Penfield', written over a light gray rectangular background.

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Mary Penfield  
Adviser, Regulatory Operations