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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Application of Rocky Mountain Power to Increase the Deferred EBA Rate through the Energy Balancing Account Mechanism)))))	Docket No. 18-035-01 Reply Comments of the Utah Office of Consumer Services
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Pursuant to Utah Code § 54-10a-301, Utah Admin. Code r. 746-1 and the Utah Public Service Commission’s (“Commission”) March 29, 2018, Scheduling Order, Notice of Hearing, and Tariff Status (“Scheduling Order”), the Office of Consumer Services (“Office”) submits these Reply Comments. On April 5, 2018, in accordance with the Scheduling Order, the Utah Division of Public Utilities (“Division”) after conducting a preliminary review of PacifiCorp’s Application to Increase the Deferred EBA Rate filed a Memorandum concluding that PacifiCorp’s “filing appears to not depart substantially from prior years’ filings.” April 5, 2018, Memorandum at 1. The Division’s April 5th Memorandum was filed in accordance with the Commission’s February 16, 2017, Order in Docket No. 09-035-15, which interposed interim rate procedures into the EBA mechanism. However, the portion of the February 16th Order which imposed interim rates into the EBA has been appealed by the Office and the Utah Association of Energy Users. *Utah Office of Consumer Services v. Utah Public Service Commission*, No. 20170364-SC.

In order not to waive any issue presently on appeal, the Office objects to all portions of the Division's April 5th Memorandum which reference the imposition of, and the procedures for, the application of interim rates in the EBA mechanism. The Office concurs with the remaining recommendations and conclusions in the Division's April 5th Memorandum.

Respectfully submitted, April 19, 2018.

/s/ Robert J. Moore
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Attorney for the Utah Office of Consumer Services