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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electronic Service Schedules and Electronic Service Regulations	Docket No. 20-035-04 Objection to Rocky Mountain Power's Proposal for Limited Briefing and Oral Argument and Alternative Proposal
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Pursuant to Utah Code § 54-10a-301, UTAH ADMIN. CODE r. 746-1-101 through 801 and the Public Service Commission of Utah's ("PSC") November 6, 2020 Notice, the Office of Consumer Services ("OCS") objects to Rocky Mountain Power's ("RMP") proposal for ten pages of legal briefs and twenty minutes for closing statement on each of the three phases in this case. While the OCS does not object to RMP's proposal to twenty minutes of closing statements for each phase which the parties presented testimony, the OCS believes that ten pages of briefing is insufficient. Therefore, the OCS proposes that legal briefing should be expanded to eight pages of briefing for each phase of the hearing in which parties presented testimony.

Accordingly, parties that presented testimony only in one phase will have up to eight pages of briefing, parties presenting testimony in two phases will have up to sixteen pages of briefing and parties presenting testimony in all three phases will have up to twenty-four pages of briefing.

This procedure will allow more complete briefing without overwhelming the PSC excessive written argument. Moreover, allowing the parties with up to eight pages for each phase will allow sufficient written argument to give the PSC easy reference to the parties' central arguments. Without sufficient briefing the PSC could be forced to comb through hundreds of pages of transcripts to reference arguments and cites to the record made in hours long closing statements. With regard to citing the record, the OCS ask the PSC to clarify when transcripts of the hearing will be available.

In sum, the OCS believes that its proposal will be more helpful to the PSC than the proposal of RMP.

Respectfully submitted November 9, 2020.

/s/ Robert J. Moore
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