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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH	
Rocky Mountain Power's 2023 Wildland Fire Cost and Compliance Report	Docket No. 23-035-27 Motion for Leave to File Supplemental Initial Comments

Pursuant to UTAH ADMIN. CODE r. 746-1 and the Public Service Commission of Utah's (PSC) July 12, 2023, Scheduling Order the Office of Consumer Services (OCS) files this Motion for Leave to File Supplement Initial Comments.

The July 12, 2023, Scheduling Order set August 28, 2023, as the date for filing Initial Comments in Phase II of this docket and September 22, 2023, for the filing of Reply Comments. However, due to miscommunications and the need for follow up DRs, the OCS was unable to conduct sufficient discovery to fully comment on Rocky Mountain Power's (RMP) 2023 Wildland Fire Cost and Compliance Report on August 28, 2023. Moreover, on August 28th, the date for filing the initial comments, RMP filed answers to the OCS's second set of discovery requests. These answers contained additional information and raised additional concerns. Because of the timing of RMP's answers, the OCS did not receive the RMP's responses to the OCS's second set of discovery request in sufficient time to incorporate them into the initial comments filed on August 28, 2023.

Rather than waiting to respond to RMP answers in Reply Comments, the OCS has filed Supplemental Initial Comments together with this Motion. The OCS believes this approach is justified because it did not receive RMP's answers to the second set of discovery request in time to incorporate them into the scheduled comments. Moreover, this approach is in all parties' interest. If the OCS waited to respond to RMP's second set of discovery request until the Reply Comments, RMP would be deprived of the opportunity to respond to the OCS's concerns stemming from RMP's August 28th responses. However, by raising these concerns now, RMP has the chance to address the OCS's comments in RMP's Reply Comments. This will enable the PSC to resolve any disputes arising in this docket on a more fully developed record. Therefore, the OCS requests that the PSC consider, and RMP address, the OCS's Supplemental Initial Comments.

CONCLUSION

For the reasons outlined above, the OCS request the PSC to grant this Motion for Leave to File Supplemental Initial Comments.

Respectfully submitted, September 1, 2023.

Robert J. Moore
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ASSISTANT ATTORNEY GENERAL
Attorney for the Office of Consumer Services

CERTIFICATE OF SERVICE
DOCKET NO. 23-035-27

I certify that on September 1, 2023, a true and correct copy of the Utah Office of Consumer Services' Motion for Leave to File Supplemental Comments was filed with the Public Service Commission and served electronically via email to the following:

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Utah Office of Consumer Services