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To: The Public Service Commission of Utah  
From: The Office of Consumer Services  
Michele Beck  
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Copies To: Parties of Record  
Date: May 18, 2009  
Subject: Initial Recommendations in the Rulemaking Determining Filing Requirements, Docket No. 09-999-08

The Office of Consumer Services (“Office” or “OCS”) submits these comments in response to the Commission’s request for initial recommendations regarding the scope and content of rules applying to filing requirements for general rate cases and major plant additions.

The Office notes that many other states have existing rules governing the filing of different types of utility filings. Our analysis included a partial review of these states. Attachment A to this memo includes our recommendations for rules that reflect the best practices from some of the other states. We recognize that not all requirements would apply to all utility types (for example, the Office does not work on water utility filings) and expect that the differences across industries can be worked out during this ongoing rulemaking process.

We also note that many parties will likely reference back to the existing master data requests (MDR) that have been provided either by agreement or voluntarily in recent general rate cases. The Office believes that both MDR A and MDR B contain information necessary for the adequate review of a general rate case filing and recommend that the information be memorialized in the rules. However, all supporting information should be provided at the time of filing to allow intervenors and regulators the full 240 days for review. Attachment B contains our recommendations for some minor changes to the revenue requirement information currently required in the MDRs and Attachment C contains our recommendations for net power cost requirements.

Finally, the Office believes that the filing requirements for general rate cases will be a good starting point for the requirements for major plant additions. Attachment D is a brief outline of some of the specific information that we believe will be required for adequate review.