Mark C. Moench (2284)
Yvonne R. Hogle (7550)
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
(801) 220-4050
(801) 220-3299 (fax)
mark.moench@pacificorp.com
yvonne.hogle@pacificorp.com
Attorneys for Rocky Mountain Power

Colleen Larkin Bell (5253)
Jenniffer Nelson Byde (7947)
Questar Gas Company
180 East First South
P.O. Box 45360
Salt Lake City, Utah 84145-0360
(801) 324-5556
(801) 324-5935 (fax)
colleen.bell@questar.com
Attorneys for Questar Gas Company

Gregory B. Monson (2294)
Ted D. Smith (3017)
Stoel Rives LLP
201 South Main Street, Suite 1100
Salt Lake City, UT 84111
(801) 578-6946
(801) 578-6999 (fax)
gbmonson@stoel.com
tsmith@stoel.com
Attorneys for Rocky Mountain Power and Questar Gas Company

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rule-Making for Rule Provisions Delineating "Complete" Application Requirements for Rate Case and Major Plant Addition Applications Pursuant to Utah Code Sections 54-7-12 and 54-7-13.4	Docket No. 09-999-08 **JOINT COMMENTS OF ROCKY MOUNTAIN POWER AND QUESTAR GAS COMPANY ON PROPOSED SB 75 RULES**

Rocky Mountain Power, a division of PacifiCorp ("Rocky Mountain Power"), and Questar Gas Company ("Questar Gas") respectfully provide these joint comments[1] and suggested amendments to the draft rules circulated to the parties on June 1, 2009 ("proposed rules") by the Public Service Commission of Utah ("Commission"). The proposed rules were developed in response to Senate Bill 75 ("SB 75") enacted by the Utah Legislature during the 2009 General Session. These comments and suggested amendments are provided pursuant to the Pre-Rulemaking Schedule issued by the Commission in this docket on May 4, 2009.

Specifically, these comments are directed to the following draft rules:

- Rule 700 (Test Period Information)
- Rule 710 (Information to be Provided with General Rate Case Application)
- Rule 712 (Information or Documents to be Available at Same Time as General Rate Case Application)
- Rule 713 (Additional Information Related to Power Costs)
- Rule 720 (Information for Alternative Cost Recovery for Major Plant Additions)
- Rule 760 (Confidential Information).

Neither Rocky Mountain Power nor Questar Gas take a position on proposed Rules 730, 731, 740, or 741, which apply only to telecommunications and water companies.

I. INTRODUCTION

Rocky Mountain Power and Questar Gas believe the proposed rules represent a serious and largely successful effort by the Commission to draft a set of rules that will provide utilities

[1] With a few minor exceptions, all of which are noted, these comments represent the position of both companies. Rule 713, however, relates to "net power costs" ("NPC") and applies only to electric utilities. Thus, the comments on this rule are those of Rocky Mountain Power alone.

and other parties with greater certainty as to what constitutes a "complete filing" under SB 75. Neither Rocky Mountain Power nor Questar Gas objects to the vast majority of the language in the proposed rules.

Nonetheless, Rocky Mountain Power and Questar Gas strongly believe that a few aspects of the proposed rules need to be changed and that other aspects of the proposed rules can be improved by amendments (including some deletions). The concerns of Rocky Mountain Power and Questar Gas fall into several categories: (1) general conceptual and legal problems with certain aspects of the rules (which the parties will address first), (2) ambiguities in the proposed rules that can be resolved by editing that clarifies the rules, (3) provisions that are unduly broad or burdensome and should be narrowed or eliminated, (4) provisions that require utilities to provide information that has not been relevant in past rate cases—the burden of compiling and providing this information appears to far outweigh any potential value, and (5) provisions in one rule that duplicate similar provisions in other rules.

Attachment A hereto is a redlined version of Rules 700, 710, 712, 720, and 760 that represent the joint proposals of Rocky Mountain Power and Questar Gas. The proposed revisions to Rule 713 in Attachment A are solely the suggestions of Rocky Mountain Power.

A. Future Test Period/240-Day Period (Rule 700).

In their prior comments, Rocky Mountain Power and Questar Gas expressed legal and policy concerns with rules that have the effect of undermining or altering the 240-day period for the resolution of general rate cases that has been in Utah statutes for decades.[2] Instead of repeating those arguments in detail here, Rocky Mountain Power and Questar Gas will

[2] *See* Rocky Mountain Power Comments at 5-9 and Questar Gas Comments at 1-2. Rocky Mountain Power and Questar Gas hereby incorporate those earlier comments herein by reference.

summarize them in the context of proposed Rule 700, which contains provisions for pre-approval of the test period for a case to be filed in the future (Rule 700.B) or, in the alternative, requires the utility to file, along with its application, four completely-developed test periods. These aspects of Rule 700 are unlawful and unreasonably burdensome.

One of the major purposes of SB 75 was to address the potential ambiguity in the statutes that led to the extensive legal activity and order in Rocky Mountain Power's Docket No. 08-035-38. Enacted after Docket No. 08-035-38, SB 75 reemphasized the obligation of the Commission to act on general rate case applications within 240-days subject to the requirement that an application would need to meet some reasonable minimum standard (a "complete filing") in order for the 240-day period to begin to run. But SB 75 was not intended to provide authority for the Commission to extend the 240-day period by imposing pre-filing requirements on public utilities nor was it intended to modify Utah Code Ann. § 54-4-4(3)(a), which allows the Commission to select a forecasted test period that, on the basis of evidence, the Commission finds best reflects the conditions a public utility will encounter during the rate-effective period.

Under section 54-4-4(3)(a), the utility has the burden of proof to demonstrate why its test period best reflects the conditions it will encounter during the rate-effective period. The utility does not have the burden to demonstrate or forecast how adjustments will impact alternative test periods. Understandably, the Commission and other parties may want to analyze the underlying data to determine if they agree with the utility's proposed test period. Therefore, to the extent it is applicable to the requesting utility, the requirements of Attachment A as proposed, allow the necessary exchange of data, in a timely manner, for other parties to review and take a position regarding the Company's test period proposal or to propose their own test period.

Specifically, Rule 700, as proposed by the Commission, provides that the utility may only use a forecasted test period in its application if it provides support for four alternative test periods

or seeks approval of the test period planned to be used prior to filing the general rate case application. This option places the utility in the untenable position of choosing between compiling the data and support for four alternative test periods that will be filed contemporaneously with its general rate case filing or extending the 240-day time period for determining a request for rate relief. Both choices exceed the scope and intent of SB 75 and Section 54-4-4(3)(a) and are unlawful. It is well established that the Commission has only those powers specifically granted or clearly implied by statute. *See, e.g. Hi-Country Estates Homeowners Ass'n v. Bagley & Co.*, 901 P.2d 1017, 1021 (Utah 1995). "Any reasonable doubt of the existence of any power must be resolved against the exercise thereof." *Id.* at 1021 (quoting *Williams v. Public Serv. Comm'n*, 754 P.2d 41, 50 (Utah 1988)). Therefore, because section 54-7-12, as amended by SB 75, retains and reaffirms the 240-day period for resolution of rate cases, proposed Rule 700.B is unlawful and should be eliminated from the rule. In addition, although utilities have the burden of proof in rate cases that they file, they cannot be required to make other parties' cases for them. Thus, it is inappropriate to require a utility to file a test period that it does not propose to use.

At the same time, Rocky Mountain Power and Questar Gas acknowledge that the requirement that a utility provide a reasonable amount of information to assist in the choice of an appropriate test period is appropriate. Rocky Mountain Power and Questar Gas have proposed amendments to Rule 700.A that will provide that information to the Commission and parties without requiring the utilities to provide levels of information on multiple test periods that are unnecessary and burdensome. For the reasons set forth above, Rocky Mountain Power and Questar Gas strongly believe that the proposed requirements of Rule 700 A, to file four alternative test periods simultaneously with a general rate case application or Rule 700 B, to file

for pre-approval of a test period and extend the 240 day period should be removed from the rules. Those proposed changes are reflected in redline on Attachment A.

B. The "Complete Filing" Requirement

SB 75 conditions the commencement of the 240-day period on the utility making a "complete filing." By using the term "filing," the Legislature was clearly referring to the information that must be filed with the Commission as part of the utility's rate application, as opposed to other information that needs to be available on request from other parties. In the proposed rules, Rules 700, 710, and 711 outline the information that must be filed with the Commission. To make this issue clear, Rocky Mountain Power and Questar Gas have proposed an addition to Rule 710 (it would become section 710.A) that states: "A gas or electric utility has made a 'complete filing' for a general rate case if it files the information required in Rules 700, 710, and 711. The requirements of other rules are not part of the 'complete filing' requirement." Rocky Mountain Power and Questar Gas strongly recommend that the Commission adopt this language in order to foreclose future disputes.

C. Timing of Information Required by Rules 712 and 713

As discussed in more detail below, Rocky Mountain Power and Questar Gas propose that some of the mandated information that must be available to other parties in Rule 712 be removed from the rule. Likewise, Rocky Mountain Power proposes that some of the mandated information that must be available to other parties in Rule 713 be removed from the rule.

However, totally aside from the contents of the information that must be made available under Rules 712 and 713 there exists the question of when the utility must make the information available. Rules 700, 710, and 711 place heavy burdens on the filing utility to pull together a massive amount of data and other information and then put it into a docket-quality format for filing. As proposed, Rules 712 and 713 mandate that the filing utility also have the large

amounts of information called for in those rules available to the parties on the same date as the application filing. This is an unduly burdensome requirement, particularly given the fact that the information that must be provided along with the application under Rules 700, 710, and 711 is far more detailed than has ever before been required in Utah.

In other words, the Commission and the other parties will, through the application of Rules 700, 710, and 711, be receiving extremely large quantities of information—information that they will not be able to immediately digest and analyze. Thus, in the interest of allowing the filing utility to be able to dedicate itself to assuring the highest quality filing under Rules 700, 710, and 711 and given that the information necessary to make such a filing is extensive, it would be reasonable to allow the filing utility a reasonable period of time to make additional information available to requesting parties. The amendments to Rule 712 proposed by Rocky Mountain Power and Questar Gas provide that a utility will have up to 14 days to prepare and make available the information required by Rule 712. Rocky Mountain Power proposes that it be given 30 days to compile and make available the extensive information required by Rule 713 relating to NPC.[3]

There is a further reason for making the NPC information under Rule 713 available after the date of the application. The NPC information, by and large, is developed through a NPC study. A concern expressed by parties in earlier electric rate cases related to whether the data from the NPC study at issue had become stale. If the rule requires that the NPC data be available

[3] One of the natural results of mandating that large amounts of information and data not only simultaneously be compiled but also be in docket-quality format is that it imposes increased personnel requirements on the utility. While there are instances in which certain things simply cannot be done, in other cases it is a matter of hiring additional people and thus increasing overall costs that are ultimately borne by customers. A common sense approach suggests that a utility make information available in a reasonably timely manner, but that it be timed in such a manner that it does not cause the utility to unduly increase its regulatory compliance costs.

the same date as the application, Rocky Mountain Power will be required to complete the study at an earlier date than it would otherwise complete it for a rate case filing—thus, the requirement that the NPC information be available on the application date will have the effect of assuring that the NPC information is not as current as it would otherwise be. Rocky Mountain Power's proposal, on the other hand, will assure the most up-to-date NPC study possible. It is also important to note that no other state in which PacifiCorp does business has a requirement that NPC information be available in the manner that Rule 713 would require, and it bears repeating that if a party feels it needs additional information, there is still a formal discovery process that can be used.

D. Streamlined Procedure Under Major Plant Addition Rule (Rule 720) for Matters Approved Under the Energy Resource Procurement Act

The level of information required under the proposed major plant addition rule (Rule 720) is excessive in most instances. First, Rule 720 ignores the fact that many major plant additions will already be subject to the Energy Resource Procurement Act (Utah Code Ann. §§ 54-17-101 *et seq.*). The Energy Resource Procurement Act provides for a pre-approval procedure under which most, if not all, of the information to be provided under Rule 720 will have already been reviewed. Thus, Rule 720 should be amended so that if a gas or electric company has obtained approval for a significant energy resource decision for the major plant addition under the Energy Resource Procurement Act, the application for alternative cost recovery for the major plant may simply involve the provision of information regarding *any changes* to the information provided in the proceeding under the Energy Resource Procurement Act. A new section to Rule 720 has been inserted in Attachment A to address this situation.

Second, Rule 720 assumes that the utility is acquiring a major plant addition that is already in existence and has been operating for a period of time. Although this may be the case

sometimes, there will also be major plant additions that involve assets being newly constructed for the utility without any prior operating history. The rule should contain different requirements for these types of major plant additions. Amendments have been inserted in Attachment A to address this situation.

Third, a major plant addition may involve only a partial addition or upgrade to an existing plant, such as the addition of a scrubber at an electric generation plant. In such a case, the information required by Rule 720 is excessive. Amendments have been inserted in Attachment A to address this situation.

E. Privileged Information

As a matter of clarification, Rocky Mountain Power and Questar Gas have inserted at various places in the rules a statement protecting privileged information from disclosure. Confidential, but non-privileged, information will of course remain available under protective order or under the confidential information rule (Rule 760). In addition, Rocky Mountain Power and Questar Gas have proposed a few clarifying amendments to the confidential information rule (Rule 760).

F. Specific Amendments

1. Electronic Filings

In the introductory paragraph to Rule 710, Rocky Mountain Power and Questar Gas propose adding the following: "The filing utility is encouraged to provide voluminous material that is included in the application, testimony, schedules, and exhibits in electronic format." Rocky Mountain Power and Questar Gas believe that this language is consistent with the Commission's policy of avoiding the filing of voluminous written documents when they can be produced in a usable, electronic format.

2. Labor Costs

In the Labor Costs portion of Rule 710, Rocky Mountain Power and Questar Gas propose amendments that recognize that some of the information requested is not currently maintained at the level of detail called for in the rule. For example, neither Rocky Mountain Power nor Questar Gas maintain records of the employees of contractors who may be performing work for them, not do they believe such records could be kept without creating a system that would monitor the levels of contract employees on a periodic basis. Rocky Mountain Power and Questar Gas fail to see the value that would be derived from being required to maintain information at that level. Likewise, another rule requires that costs be broken out between union and nonunion labor, which is information at a level that the parties do not maintain. As amended, the rule contains language that requires the utility to provide the information only at the level at which it is currently maintained.

3. Capital Additions

a. FERC Functional Level

Rocky Mountain Power and Questar Gas propose an addition to the section dealing with capital additions language that makes it clear that the information will be maintained at the "FERC functional level," the level at which both companies maintain information on capital additions.

b. Materiality of Capital Additions

Rocky Mountain Power and Questar Gas propose that the level of itemization of specific capital addition projects be set at one percent of total plant in service as opposed to the 0.2 percent level in the proposed rule—that level is simply too low and will impose a duty of itemization that is unnecessary for a general rate case.

4. Filing of Tariff Sheets

Rocky Mountain Power and Questar Gas propose a change to the section in proposed Rule 711 dealing with the filing of tariff sheets. Instead of filing several inches of tariff sheets, most of which merely set forth proposed rate changes (which are provided elsewhere in the filing), Rocky Mountain Power and Questar Gas propose that only those tariff sheets be filed on which the utility has proposed an actual language change—this will ensure that the kinds of changes (other than rate changes) that affect the utility/customer relationship are clearly shown, but will also greatly simplify the filings by eliminating the duplicative need to file tariff sheets containing only rate changes.

5. "Workpapers" Definition

In Rule 712, Rocky Mountain Power and Questar Gas propose the following definition of the term "workpapers," as used many times in Rules 712 and 713: "the documents used to develop the inputs to the rate case filing." Rocky Mountain Power and Questar Gas believe that this definition is the commonly accepted meaning of the term in the context of rate cases. To further assure that the workpapers will not change dramatically, Rocky Mountain Power and Questar Gas also propose to make it clear that the workpapers they provide will be comparable to the workpapers they have provided in prior rate cases.

6. Duplicative Requirements

Rules 710 and 711 impose significant filing requirements on Rocky Mountain Power and Questar Gas. As such, it is important that they not be required in Rule 712 to provide precisely the same information that will have already been provided in the filed material. Rocky Mountain Power and Questar Gas thus propose the elimination of the duplicative requirements in Rules 712. For example, the material requested in proposed Rule 712.B.3 related to labor costs is already required in proposed Rule 710.C. The workpapers described in proposed Rule 712.B.5.b

is already required by proposed Rule 710.C.. The Cost of Service information described in proposed Rule 712.C is already covered by Rule 711. The materials requested in proposed Rules 712.D.19, 712.D.20, 712.D.23. 712.D.24 are all covered by various subsections of proposed Rule 710.

7. The 14-Day Issue in Rule 712

Although Rocky Mountain Power and Questar Gas have addressed this issue above, it is important that the utilities be allowed at least 14 days to gather and compile in a docket-quality format all of the additional information required in Rule 712 that is over and above similar information provided with the application under Rules 700, 710, and 711.

8. Issues Related to Proposed Rule 713 (Net Power Costs)

The same issue discussed immediately above regarding Rule 712 also applies to Rule 713. It is critical that Rocky Mountain Power be given 30 days to compile the workpapers and other information required by Rule 713. Indeed, Rocky Mountain Power's proposed amendments to Rule 713 are premised on having 30 days in which to gather that information. If Rocky Mountain Power is not allowed that period of time, then it would propose significant limitations on the amount of information that it can reasonably expect to provide on the application date.

In addition to the timing issue, the structure of Rule 713 creates problems for Rocky Mountain Power.

The most significant of these structural problems relates to the duplicative nature of many of the proposed subsections in relation to subsection C.1. Subsection C.1, as amended by Rocky Mountain Power, states: "Workpapers that show the source, calculations and details supporting the testimony, other exhibits and ~~all~~ PCM input data. The workpapers will include, at a minimum, copies of the net power cost report in Excel and the net power cost model database."

The subsection constitutes an all-encompassing request that includes the specific information described in many of the later subsections. For example, with the existence of subsection C.1, there is no need for the following subsections, as the specific information sought in them is subsumed within subsection C.1: proposed subsections C.3, C.7, C.8, C.10, C.11, C.15, C.16, C.18-C.20, C.28, and C.31. Given that this information is already inherent in subsection C.1, Rocky Mountain Power proposes their elimination from the rules.

The second major area of concern in Rule 713 is that several of the items requested in the rule are irrelevant and not normally relied upon by Rocky Mountain Power for determining revenue requirement. In the case any of this information is relied upoin in a particular filing, this information will be included in subsection C.1. These include proposed rules C.23 through C.27 and C.30. These subsections request information that is irrelevant to the development of estimates of net power costs, and also represent levels of detail that would, in addition to being irrelevant, be time consuming to compile. As such, they should be eliminated from the rule.

Two other issues related to proposed Rule 713 are worthy of mention. First, the second sentence of subsection C.4 would require multiple runs of the NPC study to attempt to isolate the specific impact of each modeling or logic change. This could require a massive amount of time and effort, often for changes that are of little or no significance. To the extent a change in logic or an enhancement appears on its face to have a potential major impact, Rocky Mountain Power will work with other parties to identify its specific impact—but to require that Rocky Mountain Power do this for every change, no matter how insignificant, is unduly burdensome. Second, in C.27, the rule would require a comparison of "loss factor" information for five calendar years. Rocky Mountain Power is more than willing to show the loss factor used in developing the revenue requirement in a case, but to require specific information that may not be used by the utility is clearly unreasonable.

9. Miscellaneous Editing Proposals

In various places throughout Attachment A, Rocky Mountain Power and Questar Gas have made editing changes. Most of them are for obvious reasons that do not require explanation. However, a few of the changes bear brief discussion.

For example, in Rule 700, the proposed rule in two places uses forms of the word "demonstrate." The problem with that word is that it suggests, in a rule that describes the information that must be filed initially by a utility, that failure to ultimately "demonstrate" the correctness of each adjustment could then be used as the basis for a claim that the filing was incomplete. Neither Rocky Mountain Power nor Questar Gas challenges the idea that their initial filings should describe the adjustments they propose nor do they have a problem with the idea that the adjustment must ultimately be "demonstrated" on the basis of the whole record before the Commission, but both Rocky Mountain Power and Questar Gas believe the use of the word "demonstrate" could cause potential legal questions if used in the rule to describe the standard that must be met in a utility's initial filing.

Likewise, in proposed Rule 720.A.6, the word "establishing" is used in a manner similar to the use of "demonstrate" in Rule 700 (see section 720.B.1.f as renumbered in Attachment A). For the same reason, Rocky Mountain Power and Questar Gas have replaced "establishing" with "describing."

10. Rule 760

The only significant change proposed by Rocky Mountain Power and Questar Gas to Rule 760 relates to the question of which party has the burden of going forward when the utility and it cannot agree that certain information should be subject to heightened confidentiality requirements under the protective order. Rocky Mountain Power and Questar Gas strongly believe that, as with a typical motion to compel, the burden of going forward with resolution of a

conflict regarding why the heightened confidentiality should not be applied should be on the party seeking the information.

11. Rate Case Filing Rules from Other States

Rocky Mountain Power and Questar Gas have made an effort to examine rate case filing rules (or the lack thereof) of other public utility commissions in a variety of other states. While the companies have not looked at the statutes and rules of every state, it is clear from our analysis of the links provided by the OCS in its initial filing and a review of other states that the Utah rules at issue here are among the most extensive in the country in terms of the sheer quantity and variety of material that gas and electric utilities are required to file. In many, perhaps most states, the only guidance provided for rate case filings are the statutory provisions (such as Utah Code Ann. § 54-7-12) supplemented by the general rules of practice and procedure adopted by state commissions to govern all types of hearings.

As the OCS and UIEC pointed out, several state commission (and FERC) have adopted rules governing certain aspects of general rate cases. Our review indicates that, with at least one notable exception (Illinois), most of the other states' rules require far less of the utility than the proposed Utah rules. For example, the Montana rule requires the filing of about 15 schedules and some workpapers. The Michigan order identifies 39 standard schedules that must be filed. The Washington rules identify 12 schedules that must be filed. In other states—for example, Maine, Iowa, Missouri, and Ohio—the rules identify different subject matter areas that should be addressed in a rate case filing, but do not mandate particular schedules that must be filed.

The UIEC actually attached the FERC and the Nevada rules to its initial filing. The FERC rules are very different from the proposed Utah rules in that they focus almost entirely on identifying and defining the specific schedules that the utility must file, and the vast majority of them are typical revenue requirement schedules that a utility would, even in the absence of rules,

typically file with any rate case (*e.g.*, balance sheets, income statements, accumulated depreciation and amortizations, tax schedules, working capital, and the like). In terms of their overall filing requirements (and certainly when workpapers are factored in), the FERC rules impose fewer burdens on the utility than the proposed Utah rules.

The UIEC also filed the Nevada rules relating to rate changes. While these rules impose significant filing requirements on a utility seeking rate relief, they impose fewer requirements on utilities than the proposed Utah rules. Several sections of the Nevada rules deal with information that is required in the application or to be filed with the application, including tariffs with proposed rates, and approximately 40 specifically identified schedules (most of which relate to revenue requirement issues and which would typically be included in a utility's filing). (See NAC 703.2265 through 703.2455). While the requirements of this rule are not insignificant, they are less than those included in the proposed Utah rules. Just as an example, there is nothing in the rule that even approximates proposed Rule 713 dealing with net power costs.

While our review of other states was, admittedly, not comprehensive, we were unable to find anything comparable to proposed Rule 700's pre-approval procedure for test periods nor anything like the requirement that, in the alternative, a utility must file four separately-developed test year calculations with its application. For example, the link supplied by the OCS for New York is to a 1977 order that discusses in general conceptual terms the information the New York Commission requires New York utilities to file relating to both historical and forecasted test periods, and the relationship between them. There is nothing in the New York order that would place anything like the multiple test-year filing burden placed on Utah utilities in proposed Rule 700.

II. CONCLUSION

It is not the purpose of either Rocky Mountain Power or Questar Gas to suggest that the Commission eliminate the majority of the proposed rules but rather to suggest that the amendments to the proposed rules by Rocky Mountain Power and Questar Gas should be accepted for the foregoing reasons. Although Rocky Mountain Power and Questar Gas agree with the vast majority of the language in the proposed rules, the changes suggested in Attachment A are necessary to assure that the rules comply with the law or will clarify the rules or eliminate duplicative or unnecessary production of information. Rocky Mountain Power and Questar Gas thus respectfully recommend that the proposed rules be amended as provided in Attachment A.

DATED: June 11, 2009.

Respectfully submitted,

ROCKY MOUNTAIN POWER

Mark C. Moench
Yvonne Rodriguez Hogle
Rocky Mountain Power

QUESTAR GAS COMPANY

Colleen Larkin Bell
Jenniffer Nelson Byde

_____

Gregory B. Monson
Ted D. Smith
Stoel Rives LLP

Attorneys for Rocky Mountain Power and Questar Gas

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **JOINT COMMENTS OF ROCKY MOUNTAIN POWER AND QUESTAR GAS COMPANY ON PROPOSED SB 75 RULES** to be served upon the following by electronic mail to the addresses shown below on June 11, 2009:

Sandy J. Mooy
Legal Counsel
Public Service Commission of Utah
400 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
smooy@utah.gov

Rebecca L. Wilson
Carol Revelt
Public Service Commission of Utah
400 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
rlwilson@utah.gov
crevelt@utah.gov

Michael Ginsberg
Patricia E. Schmid
Assistant Attorney Generals
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
mginsberg@utah.gov
pschmid@utah.gov

Philip J. Powlick
William A. Powell
Marlin Barrow
David T. Thomson
Division of Public Utilities
400 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
philippowlick@utah.gov
wpowell@utah.gov
mbarrow@utah.gov
dthomson@utah.gov

Paul H. Proctor
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Michele Beck
Cheryl Murray
Office of Consumer Services
200 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
mbeck@utah.gov
cmurray@utah.gov

Stephen F. Mecham
Callister, Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, UT 84133
sfmecham@cnmlaw.com

Brett Anderson
Blackburn & Stoll
257 East 200 South, Suite 800
Salt Lake City, UT 84111
banderson@blackburn-stoll.com

Gary A. Dodge
Hatch, James & Dodge
10 West Broadway, Suite 400
Salt Lake City, UT 84101
gdodge@hjdlaw.com

F. Robert Reeder
William J. Evans
Vicki M. Baldwin
Patrice Lemasney
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, UT 84111
bobreeder@parsonsbehle.com
bevans@parsonsbehle.com
vbaldwin@parsonsbehle.com
plemasney@parsonsbehle.com

SaltLake-455022.1 0085000-01022