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March 3, 2010

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City UT 84111

Attention: Julie P. Orchard
Commission Secretary

Re: Docket No. 06-999-03
Rocky Mountain Power's Fossil Fuel Energy Efficiency Standard Plan

On August 10, 2007, the Utah Commission issued its Determination Concerning the PURPA Fossil Fuel Generation Efficiency Standard and adopted the PURPA Fossil Fuel Generation Efficiency Standard with a due date of March 31 each year. A sample of the Rocky Mountain Power Fossil Fuel Energy Efficiency Standard Plan was provided to the Commission on May 21, 2008, and the first full report was provided March 31, 2009. For the reasons stated below Rocky Mountain Power requests that the due date for the current and future reports be moved out one month to May 1 of each year.

As a part of filing Rocky Mountain Power also provides a summary of the most current FERC Form 1 plant operations data. Because Rocky Mountain Power does not file its FERC Form 1 until mid April each year, the most current data is not public until after the March 31 due date. As a result the most current FERC Form 1 data that can be provided with a report filed on March 31 will be from the period two years prior. For example, the FERC Form 1 data included in the March 31, 2009 filing was from the 2007 FERC Form 1.

The proposal to move the filing date out one month so the most recent year FERC Form 1 data could be included was discussed during the technical conference on June 22, 2009. At that time both the Division of Public Utilities and the Office of Consumer Services expressed their support for the change in the filing date. At that technical conference, Rocky Mountain Power also agreed to include natural gas plants in future Fossil Fuel Efficiency Plans.

It is respectfully requested that all formal correspondence and staff requests regarding this filing be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

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By regular mail: Data Request Response Center
 PacifiCorp
 825 NE Multnomah, Suite 2000
 Portland, Oregon, 97232

Informal questions should be directed to Dave Taylor at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation

cc: Division of Public Utilities
 Office of Consumer Services