



201 South Main, Suite 2300  
Salt Lake City, Utah 84111

May 5, 2011

***VIA OVERNIGHT DELIVERY***

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

Attention: Julie P. Orchard, Commission Secretary

RE: Docket No. 10-035-124  
Resubmitted December 2010 Results of Operations, Cost of Service Study and Wind Resources Report

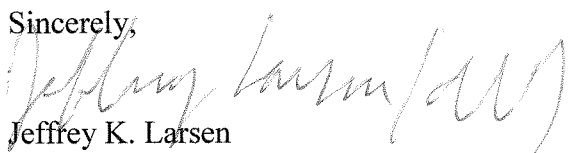
In compliance with the Commission's letter of April 28, 2011, Rocky Mountain Power hereby submits for filing a revised version of PacifiCorp's Semi-annual Results of Operations report and Cost of Service study for the Utah jurisdiction for the twelve months ended December 2010. As directed by the Commission the revised results of operations and cost of service study were developed using the monthly state loads at the time of actual monthly system coincident peaks in calendar year 2010. Included are an electronic copy on CD and three hard copies of both reports.

The revised monthly state loads do not impact the confidential net power cost detail report or the confidential 2010 Wind Resources Report that were filed on April 15, 2011. These reports are not resubmitted with this filing.

Rocky Mountain Power strongly disagrees with the Commission staff's view that there are state load input errors and system coincident peak misstatements in the April 15, 2011, filing. The Company has refined and, in the Company's view, improved the method of applying the temperature normalization adjustments utilized in determining the hour and value of the normalized monthly coincident peaks. Under this method the hour or day of the normalized system peak may be different from the non-normalized system coincident peak. The Company does not consider this change either an error or misstatement. Prior to preparing and filing the next semi-annual results of operations Rocky Mountain Power would like to meet with the Commission staff and other interested parties to explain the methodology refinement.

If there are any questions related to these reports please contact Dave Taylor at 801-220-2923.

Sincerely,

  
Jeffrey K. Larsen  
Vice President, Regulation

Enclosures

cc: Service List in Docket No. 10-035-124

CERTIFICATE OF SERVICE

I hereby certify that on this 5<sup>th</sup> of May, 2011, a true copy of the foregoing document was sent via email and/or overnight delivery to the following:

Paul Proctor  
Assistant Attorney General  
Utah Office of Consumer Services  
Heber M. Wells Bldg., 5<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111  
[pproctor@utah.gov](mailto:pproctor@utah.gov)

Cheryl Murray  
Michele Beck  
Utah Office of Consumer Services  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, UT 84111  
[cmurray@utah.gov](mailto:cmurray@utah.gov)  
[mbeck@utah.gov](mailto:mbeck@utah.gov)

Chris Parker  
William Powell  
Division of Public Utilities  
Heber M. Wells Building  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[ChrisParker@utah.gov](mailto:ChrisParker@utah.gov)  
[wpowell@utah.gov](mailto:wpowell@utah.gov)

Patricia Schmid  
Assistant Attorney General  
Utah Division of Public Utilities  
Heber M. Wells Bldg., 5<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111  
[pschmid@utah.gov](mailto:pschmid@utah.gov)

Dennis Miller  
Division of Public Utilities  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[dennismiller@utah.gov](mailto:dennismiller@utah.gov)

Gary A. Dodge  
Hatch James & Dodge  
10 West Broadway, Suite 400  
Salt Lake City, UT 84101  
[gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)

Peter J. Mattheis  
Eric J. Lacey  
Brickfield, Burchette, Ritts & Stone, P.C.  
1025 Thomas Jefferson Street, N.W.  
800 West Tower  
Washington, D.C. 2007  
[pjm@bbrslaw.com](mailto:pjm@bbrslaw.com)  
[elacey@bbrslaw.com](mailto:elacey@bbrslaw.com)

Kevin Higgins  
Neal Townsend  
Energy Strategies  
39 Market Street, Suite 200  
Salt Lake City, UT 84101  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)  
[ntownsend@energystrat.com](mailto:ntownsend@energystrat.com)

F. Robert Reeder  
William J. Evans  
Vicki M. Baldwin  
Parsons Behle &, Latimer  
201 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
[bobreeder@parsonsbehle.com](mailto:bobreeder@parsonsbehle.com)  
[vbaldwin@parsonsbehle.com](mailto:vbaldwin@parsonsbehle.com)  
[bevans@parsonsbehle.com](mailto:bevans@parsonsbehle.com)

Steven Michel  
Western Resource Advocates  
2025 Senda de Andres  
Santa Fe, NM 87501  
[smichel@westernresources.org](mailto:smichel@westernresources.org)

Nancy Kelly  
Western Resource Advocates  
9463 N. Swallow Rd.  
Pocatello, ID 83201  
[nkelly@ida.net](mailto:nkelly@ida.net)

Arthur F. Sandack (Bar No. 2854)  
8 East Broadway, Ste 510  
Salt Lake City, Utah 84111  
801-595-1300 office  
801-363-1715 fax  
[asandack@msn.com](mailto:asandack@msn.com)

Holly Rachel Smith, PLLC  
Hitt Business Center  
3803 Rectortown Road  
Marshall, VA 20115  
[holly@raysmithlaw.com](mailto:holly@raysmithlaw.com)

Captain Shayla L. McNeill  
Ms. Karen S. White  
AFLOA/JACL-ULFSC  
139 Barnes Ave, Suite 1  
Tyndall AFB, FL 32403  
[Shayla.mcneill@tyndall.af.mil](mailto:Shayla.mcneill@tyndall.af.mil)  
[Karen.white@tyndall.af.mil](mailto:Karen.white@tyndall.af.mil)

Ryan L. Kelly  
Kelly & Bramwell, P.C.  
11576 South State St. Bldg. 1002  
Draper, UT 84020  
[ryan@kellybramwell.com](mailto:ryan@kellybramwell.com)

Sharon M. Bertelsen  
Ballard Spahr LLP  
One Utah Center, Suite 800  
201 South Main Street  
Salt Lake City, Utah 84111  
[bertelsens@ballardspahr.com](mailto:bertelsens@ballardspahr.com)

Stephen F. Mecham  
Callister Nebeker & McCullough  
10 East South Temple Suite 900  
Salt Lake City, Utah 84133  
[sfmecham@cnmlaw.com](mailto:sfmecham@cnmlaw.com)

Betsy Wolf  
Salt Lake Community Action Program  
764 South 200 West  
Salt Lake City, UT 84101  
[bwolf@slcap.org](mailto:bwolf@slcap.org)

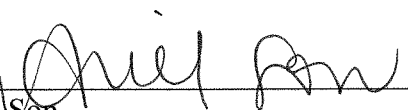
Kurt J. Boehm, Esq.  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

Gerald H. Kinghorn  
Jeremy R. Cook  
Parsons Kinghorn Harris, P.C.  
111 East Broadway, 11th Floor  
Salt Lake City, Utah 84111  
[ghk@pkhlawyers.com](mailto:ghk@pkhlawyers.com)  
[jrc@pkhlawyers.com](mailto:jrc@pkhlawyers.com)

Brian W. Burnett, Esq.  
CALLISTER NEBEKER &  
McCULLOUGH  
Zions Bank Building  
10 East South Temple, Suite 900  
Salt Lake City, Utah 84133  
[brianburnett@cnmlaw.com](mailto:brianburnett@cnmlaw.com)

Steve W. Chriss  
Wal-Mart Stores, Inc.  
2001 SE 10<sup>th</sup> Street  
Bentonville, AR 72716-0550  
[stephen.chriss@wal-mart.com](mailto:stephen.chriss@wal-mart.com)

Sophie Hayes  
Sarah Wright  
Utah Clean Energy  
1014 2<sup>nd</sup> Avenue  
Salt Lake City, UT 84111  
[sophie@utahcleanenergy.org](mailto:sophie@utahcleanenergy.org)  
[sarah@utahcleanenergy.org](mailto:sarah@utahcleanenergy.org)

  
Ariel Son  
Coordinator, Regulatory Operations