

January 13, 2017

VIA ELECTRONIC FILING AND HAND DELIVERY

Utah Public Service Commission Heber M. Wells Building, 4th Floor 160 East 300 South Salt Lake City, UT 84114

Attention: Gary Widerburg

Commission Secretary

RE: Docket No. 16-035-36 - In the Matter of the Application of Rocky Mountain

Power to Implement Programs Authorized by the Sustainable

Transportation and Energy Plan Act

Rocky Mountain Power hereby submits for filing an original and ten copies of its Petition for Clarification in the above captioned docket. Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): <u>datarequest@pacificorp.com</u>

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By regular mail: Data Request Response Center

PacifiCorp

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Informal inquiries may be directed to Bob Lively at (801) 220-4052.

Sincerely,

Jeffrey K. Larsen

Vice President, Regulation

Enclosures

CERTIFICATE OF SERVICE DOCKET 16-035-36

I hereby certify that on this 13th day of January 2017, a true and correct copy of Rocky Mountain Power's Petition for Clarification was served by email on the following Parties:

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Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF)	
ROCKY MOUNTAIN POWER TO IMPLEMENT)	
PROGRAMS AUTHORIZED BY THE)	Docket No. 16-035-36
SUSTAINABLE TRANSPORTATION AND)	
ENERGY ACT)	
)	

ROCKY MOUNTAIN POWER'S PETITION FOR CLARIFICATION OF THE COMMISSION'S PHASE ONE REPORT AND ORDER

Rocky Mountain Power, a division of PacifiCorp ("Company" or "Rocky Mountain Power"), hereby submits this Petition for Clarification ("Petition") to the Public Service Commission of Utah ("Commission") pursuant to §§ 63G4-301 and 54-7-15 of the Utah Code and R746-100-11.F of the Commission Rules, requesting the Commission issue an order clarifying its Phase One Report and Order (the "Order"), issued December 29, 2016, approving Rocky Mountain Power's request to implement portions of its Sustainable Transportation and Energy Plan. In support of its petition, Rocky Mountain Power states as follows:

1. On December 29, 2016, the Commission issued the Order, in which it approved Phase One of the Company's request to implement programs authorized by the Sustainable Transportation and Energy Plan Act (the "Act"), Utah Code Ann. §§ 54-7-12.8, 54-20-101, *et seq*. On page 12 of the Order, in the Discussion, Findings and Conclusion section, the Commission

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found the Company's proposal with respect to demand-side management ("DSM") capitalization, along with the other issues the parties reached consensus on, to be consistent with the Act, and just, reasonable and in the public interest.

- 2. The ordering paragraph, however, did not explicitly authorize the Company to capitalize and amortize annual DSM expenditures over a ten year period and apply a carrying charge to the unamortized balance, as requested in the Company's Application. Rocky Mountain Power seeks to clarify this portion of the Commission's Order regarding the Company's proposed accounting treatment.
- 3. Accordingly, Rocky Mountain Power requests that the Commission clarify that the proposed accounting treatment is approved, and Rocky Mountain Power is authorized to capitalize and amortize annual DSM expenditures over a ten year period and apply a carrying charge to the unamortized balance, together with the allocation of the difference between DSM tariff collections and DSM amortization expense to a regulatory liability, as already approved by the Commission in the Order.

WHEREFORE, Rocky Mountain Power respectfully requests the following:

- 1. That the Commission grant Rocky Mountain Power's request for clarification.
- 2. That the Commission issue an order authorizing Rocky Mountain Power to capitalize and amortize annual DSM expenditures over a ten year period and apply a carrying charge to the unamortized balance in accordance with the Act.

DATED this 13th day of January 2017.

Respectfully submitted,

ROCKY MOUNTAIN POWER

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