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Salt Lake City, Utah 84114

December 21, 2018

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Secretary

RE: **Docket No. 18-035-36**  
Application of Rocky Mountain Power for Authority to Change its Depreciation  
Rates Effective January 1, 2021  
*Motion to Stay*

Rocky Mountain Power hereby submits its Motion to Stay deadlines established in the Scheduling Order, Notice of Technical Conference, and Notice of Hearing issued October 2, 2018, in this 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): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
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By regular mail: Data Request Response Center  
PacifiCorp  
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Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

Joelle Steward  
Vice President, Regulation

cc: Service List

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*Attorney for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

APPLICATION OF ROCKY MOUNTAIN POWER FOR AUTHORITY TO CHANGE ITS DEPRECIATION RATES EFFECTIVE JANUARY 1, 2021	DOCKET NO. 18-035-36  <b>MOTION TO STAY</b>
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Rocky Mountain Power, a division of PacifiCorp, (“Rocky Mountain Power” or the “Company”), under the Public Service Commission Administrative Procedures Act Rules, R746-1-301, hereby moves the Public Service Commission of Utah (“Commission”) to stay the deadlines established in the Scheduling Order, Notice of Technical Conference, and Notice of Hearing (“Scheduling Order”), issued October 2, 2018 in this Docket. All Parties in this docket including the Utah Division of Public Utilities (“Division”), the Office of Consumer Services (“Office”), the Utah Association of Energy Users (“UAE”), Utah Clean Energy (“UCE”), Sierra Club, and Western Resource Advocates (“WRA”) were given notice of this Motion before filing. With the exception of the Division and the Office, the Parties authorized the Company to represent that they either support or do not oppose this Motion. The Company, the Division, the Office, UAE, UCE, Sierra Club, and WRA are sometime referred to individually as a “Party” and together as “Parties”. In support of this Motion, Rocky Mountain Power states as follows:

1. On December 3-4, 2018, the Company presented preliminary studies on economic lives of its current coal plants at its 2019 Integrated Resource Plan (“IRP”) stakeholder meetings.

2. On December 5-6, 2018, the Multi-State Protocol Broad Review Work Group (“MSP work group”) met for its monthly meetings.

3. During the MSP work group meeting, the Company generally discussed its preliminary coal studies that were reviewed during the December 3-4, 2018 IRP stakeholder meetings.

4. Based on the MSP work group’s discussion regarding the preliminary coal studies, a concern was raised that the final coal studies being performed for the 2019 IRP could affect opinions about the economic lives of certain thermal units.


5. The 2019 IRP is currently scheduled to be filed March 31, 2019, but the Company may seek an extension if additional time is needed or warranted. In any event, final results in the coal studies will not be known until the 2019 IRP is filed.

6. The Parties subsequently discussed the schedule in this case and determined that a stay is warranted until the Company files its 2019 IRP with its state commissions so that the effect of final coal study results on its thermal units’ lives can be reviewed before proceeding with the schedule in this and in other states’ depreciation dockets.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission grant the Motion to Stay the deadlines in the Scheduling Order until further notice.

DATED this 21<sup>st</sup> day of December, 2018.

Respectfully submitted,

  
Yvonne R. Hogle  
Assistant General Counsel  
Rocky Mountain Power

## CERTIFICATE OF SERVICE

Docket No. 18-035-36

I hereby certify that on December 21, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

### Utah Office of Consumer Services

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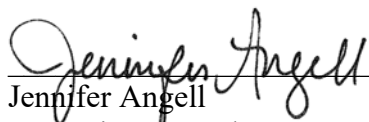
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