



1407 West North Temple, Suite 330  
Salt Lake City, UT 84116

March 21, 2019

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

Wyoming Public Service Commission  
2515 Warren Avenue, Suite 300  
Cheyenne, Wyoming 82002

Attn: Chris Petrie, Chief Counsel

Docket No. 20000-\_\_-EA-19  
Record No. \_\_\_\_\_

**RE: IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER  
FOR A PERMANENT EXTENSION FOR SUBMITTAL OF THE ANNUAL  
REPORT**

---

Dear Mr. Petrie:

Enclosed for filing are an original and four (4) copies of Rocky Mountain Power's ("Company") Application requesting approval to allow a permanent extension of the deadline for submittal of the Wyoming Public Service Commission's ("Commission") required annual report.

The Company has also provided this Application to the Commission pursuant to its electronic filing requirements and has enclosed a check in the amount of \$5.00 for the Commission's filing fee.

**Rocky Mountain Power respectfully requests an extension of the filing deadline to June 15, 2019, if a decision is not reached in this Application before the May 1, 2019 deadline for filing the calendar year 2018 annual report.<sup>1</sup>**

As outlined in the Application, gathering the information for the annual report, which includes information derived from the state jurisdictional results of operations reports, is a lengthy process and requires a significant amount of effort such that the data will not be finalized in time for the Commission's deadline.

All formal correspondence and Staff requests regarding this matter should be addressed to:

By Email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

---

<sup>1</sup> Chapter 3, Section 32 of the Commission's rules.

Wyoming Public Service Commission

March 21, 2019

Page 2

By regular mail:

Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

with copies to:

Stacy Splittstoesser  
Wyoming Regulatory Affairs Manager  
Rocky Mountain Power  
315 W. 27<sup>th</sup> St.  
Cheyenne, Wyoming 82001  
Email: [stacy.splittstoesser@pacificorp.com](mailto:stacy.splittstoesser@pacificorp.com)

Daniel E. Solander  
Senior Attorney  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Email: [daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

Informal inquiries related to this filing may be directed to Stacy Splittstoesser, Wyoming Regulatory Affairs Manager, at (307) 632-2677.

Sincerely,



Joelle R. Steward  
Vice President, Regulation

Enclosure

Daniel E. Solander  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone: (801) 220-4014  
Facsimile: (801) 220-3299  
Email: [daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

*Attorney for Rocky Mountain Power*

**BEFORE THE WYOMING PUBLIC SERVICE COMMISSION**

IN THE MATTER OF THE APPLICATION  
OF ROCKY MOUNTAIN POWER FOR A  
PERMANENT EXTENSION FOR  
SUBMITTAL OF THE ANNUAL REPORT

Docket No. 20000-\_\_\_\_-EA-19  
Record No. \_\_\_\_\_

Comes now PacifiCorp, d/b/a Rocky Mountain Power (“Rocky Mountain Power” or “the Company”) and hereby applies to the Wyoming Public Service Commission (the “Commission”) to be allowed a permanent extension of the deadline for submittal of the Commission’s required annual report.

In support of this Application, the Company represents the following:

1. The Company is a public utility in the state of Wyoming and is subject to the jurisdiction of the Commission regarding its public utility operations, retail rates, service, and accounting practices. The Company provides retail electricity service under the name of Rocky Mountain Power in Wyoming, Utah, and Idaho, and under the name of Pacific Power in the states of Oregon, Washington, and California. Rocky Mountain Power’s principal place of business in Wyoming is: 2840 East Yellowstone Highway, Casper, Wyoming 82602.

2. Formal communications and questions regarding this Application should be addressed to:

By Email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail:

Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

With copies to:

Stacy Splittstoesser  
Wyoming Regulatory Affairs Manager  
Rocky Mountain Power  
315 W. 27<sup>th</sup> St.  
Cheyenne, Wyoming 82001  
E-mail: [stacy.splittstoesser@pacificorp.com](mailto:stacy.splittstoesser@pacificorp.com)

Daniel Solander  
Senior Attorney  
Rocky Mountain Power  
1407 W. North Temple, Suite 320  
Salt Lake City, Utah 84116  
E-mail: [daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

Informal inquiries related to this Application should be directed to Stacy Splittstoesser, Wyoming Regulatory Affairs Manager, at (307) 632-2677.

3. Chapter 3, Section 32 of the Commission's rules states, "Each utility shall file on or before May 1<sup>st</sup> of each year an annual report for the preceding calendar year in the form prescribed by the Commission."

4. The Company has not been able to meet the required May 1 deadline and every year has had to request an extension to June 15 (at the earliest<sup>1</sup>) in order to complete the Wyoming annual report.

---

<sup>1</sup> Rocky Mountain Power has requested extension dates further into June or even into July and the Commission has generally granted the extensions to mid-June in order to ensure the ability to provide information in a timely manner to the Wyoming Department of Revenue.

5. Developing the Wyoming annual report requires completion of other reports, including the Federal Energy Regulatory Commission (“FERC”) Form 1, which is due to be filed with FERC in mid-April each year; and the semi-annual results of operations (“ROO”) report,<sup>2</sup> which is required to be filed in various states (including Wyoming) no later than April 30.

6. During preparation of the Wyoming annual report, the Company is also required to develop other jurisdictional reports such as the Securities and Exchange Commission’s (“SEC”) 10-Q, the FERC 3-Q, and the affiliated interest report required by the Company’s merger commitments in Docket No. 20000-EA-05-226 (Record No. 10015).

7. Wyoming’s annual report is one of the more detailed reports within the Company’s six-state service territory and requires, on average, approximately 150 hours to complete, which does not include the internal review process to ensure the accuracy of the report.

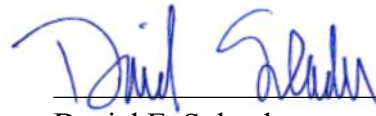
8. Because of the issues related to the annual report’s preparation described above, the Company requests a permanent extension of the Wyoming annual report due date to be on or before June 15 of each year hereafter.

For the foregoing reasons stated in this Application, Rocky Mountain Power respectfully requests Commission approval of a permanent extension of the due date for the Wyoming annual report from May 1 of each year to on or before June 15 of each year hereafter.

---

<sup>2</sup> PacifiCorp is a multi-jurisdictional utility providing electric retail service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. Costs are allocated among the states using multi-jurisdictional allocation factors. Those factors are developed based on the Company’s actual loads and state jurisdictional ROO reports. Developing the ROO reports requires the Company to run its Jurisdictional Allocation Model (“JAM”) that also takes a significant amount of time to ensure completeness and adequate review time to ensure accuracy.

Respectfully submitted this 21<sup>st</sup> day of March, 2019.



---

Daniel E. Solander  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone: (801) 220-4734  
Facsimile: (801) 220-3299  
Email: [daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

*Attorney for Rocky Mountain Power*