

## DECISION MEMORANDUM

**TO:** COMMISSIONER REDFORD  
COMMISSIONER SMITH  
COMMISSIONER KEMPTON  
COMMISSION SECRETARY  
COMMISSION STAFF

**FROM:** DON HOWELL  
DEPUTY ATTORNEY GENERAL

**DATE:** NOVEMBER 29, 2007

**SUBJECT:** ROCKY MOUNTAIN POWER'S REQUEST TO PERMANENTLY  
EXTEND THE DEADLINE FOR FILING ITS ANNUAL REPORT,  
CASE NO. PAC-E-07-15

On November 28, 2007, PacifiCorp dba Rocky Mountain Power requested that the Commission issue an Order authorizing an extension of the deadline for filing the Company's annual report. *Idaho Code* § 61-405 provides that every public utility shall file an annual report on or before April 15 but the Commission may extend the reporting deadline. In addition, Commission Order No. 29708 requires that Rocky Mountain file its annual Idaho results of operations under the six-state allocation methodology commonly known as the "Revised Protocol." The Revised Protocol is the allocation method used to allocate and assign generation, transmission and distribution costs to PacifiCorp's six retail state jurisdictions. Order No. 29708 at 9.

### ROCKY MOUNTAIN'S REQUEST

Rocky Mountain requests a permanent extension of the filing deadline for its annual report<sup>1</sup> due April 15 in each year. The Company requests that its reporting deadline be moved to May 31 of each year. Rocky Mountain asserts that gathering the information needed to compile the annual report and the results of operations "requires significant effort and is a lengthy process." The Company explained that the annual results of operations report must be completed

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<sup>1</sup> The Company's annual report is a condensed version of the "FERC Form 1." FERC Form 1 is the annual report required by the Federal Energy Regulatory Commission (FERC) that details financial and operating results for each calendar year.

prior to the filing of the annual report. Consequently, Rocky Mountain is unable to prepare its Idaho annual report by April 15 of each year.

The Company also noted that it routinely seeks an extension of time every year to complete and file its Idaho annual report. Rather than seek a yearly extension, the Company now requests a permanent extension of the filing deadline for its annual report to May 31 of each year.

#### **STAFF RECOMMENDATION**

Staff does not oppose Rocky Mountain's request to permanently postpone the filing date of its Idaho annual report. *Idaho Code* § 61-405 allows the Commission to extend the reporting deadline for an additional 60 days. Staff also believes that the Commission may treat the request as an administrative matter without further proceedings. If granted, Rocky Mountain's results of operations would be filed no later than April 30, and its Idaho annual report would be filed no later than May 31 each year.

#### **COMMISSION DECISION**

Does the Commission find good cause to grant Rocky Mountain's request?



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Don Howell  
Deputy Attorney General

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