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January 10, 2013

IDAHO PUBLIC
UTILITIES COMMISSION

Jean D. Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

RE: Case No. PAC-E-13-01
In the Matter of the Filing of Rocky Mountain Power of its 2013 Electric Integrated
Resource Plan.

Dear Ms. Jewell:

Please find enclosed an original and seven (7) copies of Rocky Mountain Power's (the
"Company") Petition for Extension of Time to File 2013 Integrated Resource Plan in the above
referenced matter.

All formal correspondence and regarding this filing should be addressed to:

Ted Weston
Rocky Mountain Power
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Salt Lake City, Utah 84111
Telephone: (801) 220-2963
Fax (801) 220-2798
Email: ted.weston@pacificorp.com

Daniel E. Solander
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111
Telephone: (801) 220-4014
Fax: (801) 220-3299
Email: daniel.solander@pacificorp.com

Communications regarding discovery matters, including data requests issued to Rocky Mountain
Power, should be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

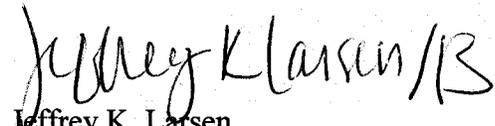
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Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very Truly Yours,

Handwritten signature of Jeffrey K. Larsen in black ink.

Jeffrey K. Larsen

Vice President, Regulation & Government Affairs

Enclosures

cc: Terrie Carlock, Idaho Public Utilities Commission
Rick Sterling, Idaho Public Utilities Commission
Jim Yost, State of Idaho – Governor’s Office
Mark Stokes, Idaho Power Company
Nancy, Kelly, Western Resource Advocates
Randall Budge, Racine, Olson, Nye, Budge & Bailey
Benjamin J. Otto, Idaho Conservation League
Megan Walseth Decker, Renewable Northwest Project

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Daniel.Solander@PacifiCorp.com

Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FILING OF)	CASE NO. PAC-E-13-01
ROCKY MOUNTAIN POWER OF ITS)	
2013 ELECTRIC INTEGRATED)	PETITION FOR EXTENSION
RESOURCE PLAN)	
_____)	

COMES NOW Rocky Mountain Power, a division of PacifiCorp (the “Company”), pursuant to RP 53, hereby petitions the Idaho Public Utilities Commission (“Commission”) to issue an Order authorizing an extension of time for filing its 2013 Integrated Resource Plan (“IRP”). In support of this request Rocky Mountain Power is states as follows:

I. BACKGROUND

Pursuant to Commission Order No. 22299 issued in Case No. U-1500-165, Rocky Mountain Power biennially files an IRP. That filing requirement was reaffirmed in Order No. 27835 issued in Case No. UPL-E-98-4 when the Commission directed the Company to file an IRP in December 2000 and every two years thereafter. That requirement was later modified in Order No. 30262 issued in Case No. PAC-E-07-03 when the Commission granted the Company’s request to file all future IRPs by the last business day of March on a biennial basis beginning in 2009.

Due to recent actions by the U.S. Environmental Protection Agency (“EPA”) that are beyond the Company’s control, as further described below, the Company respectfully requests

the Commission authorize the Company to file its 2013 IRP on or before April 30, 2013.

II. ARIZONA SIP

The EPA's proposed action on the Arizona Regional Haze State Implementation Plan ("SIP") was published in the Federal Register on July 20, 2012. While the Arizona Regional Haze SIP concluded that the low-nitrogen oxide burners at Cholla Unit 4 were sufficient to meet the Best Available Retrofit Technology requirements under the Clean Air Act, the July 20, 2012, EPA proposal required the installation of selective catalytic reduction at an emission rate of 0.05 pounds per million British thermal unit for Cholla Unit 4. On December 5, 2012, the EPA approved in part and disapproved in part Arizona's Regional Haze SIP, revising the proposed emission limits for Cholla to include emissions averaging at a rate of 0.055 pounds per million British thermal unit with Cholla Units 2 and 3 (which are owned and operated by Arizona Public Service). The Cholla Unit 4 emissions control requirements and associated assumptions will now be captured in PacifiCorp's 2013 IRP base case modeling runs.

III. WYOMING SIP

In Wyoming, pursuant to a Consent Decree entered by the United States District Court for the District of Colorado (Court) on September 27, 2011 (Dkt. No. 67), the EPA was required to take final action on the Wyoming Regional Haze SIP by October 15, 2012. That Consent Decree deadline was moved to December 14, 2012, by the EPA with agreement of WildEarth Guardians, party to the Consent Decree. On December 10, 2012, the EPA filed an unopposed motion to again modify the Consent Decree deadlines for taking action on the Wyoming Regional Haze SIP. The EPA's motion sought to modify the Consent Decree to allow it to re-propose, on or before March 29, 2013, a rule to govern compliance with Regional Haze implementation plan requirements under the Clean Air Act for the state of Wyoming. On

December 13, 2012, the Court granted the EPA's request for an extension. Consistent with the EPA's request, the EPA now has until March 29, 2013 to re-propose a Regional Haze implementation plan compliance rule and until September 27, 2013 to take final action on the rule. The EPA will be evaluating new cost and visibility analyses for several of PacifiCorp's units and will take public comment on the new information.

IV. IRP MODELING

After revision of the October 15, 2012, deadline for the EPA's action and in anticipation of the EPA's revised deadline of December 14, 2012, to take final action on the Wyoming Regional Haze SIP, the Company suspended the modeling work in preparation of the 2013 IRP, intending to re-start the modeling once the EPA's final action was made available and its impacts were assessed. The Company was concerned that it would not be an efficient use of time and resources to continue to perform its modeling based on a set of assumptions that could almost immediately change as a result of the EPA's final action. PacifiCorp's intention was to incorporate the latest information from the EPA's final action into the IRP modeling.

Given that the EPA has now requested and received additional time to re-propose action on the Wyoming Regional Haze SIP and that the re-proposed action will not be undertaken in sufficient time to allow the Company to incorporate those results into its modeling, no modifications to the base case Regional Haze compliance assumptions for Wyoming are necessary, and PacifiCorp will re-initiate its modeling efforts for the 2013 IRP. The Company will include the EPA's previously proposed action on the Wyoming SIP in the 2013 IRP stringent case modeling runs.

PacifiCorp will modify its base case Regional Haze compliance assumptions for the 2013 IRP to incorporate EPA's final actions on the Arizona Regional Haze SIP, to include the

addition, by the end of 2017, of a selective catalytic reduction system on Unit 4 of the Cholla plant.

In addition, PacifiCorp will update its forward price curve information so that base case assumptions align with the September 2012 official forward price curve, rather than the June 2012 official price curve, as well as with the most current projections of high and low natural gas prices and coal costs.

V. COMMUNICATIONS

Service of pleadings, exhibits, orders and other documents relating to this proceeding should be served on the following:

Daniel E. Solander
Senior Counsel
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Salt Lake City, Utah 84111
Daniel.Solander@PacifiCorp.com

Ted Weston
Manager, Idaho Regulatory Affairs
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
Ted.Weston@PacifiCorp.com

In addition, it is respectfully requested that all formal correspondence and Staff requests regarding this material be addressed to:

By E-mail (preferred): datarequest@pacificorp.com.

By Fax: (503) 813-6060

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

VI. CONCLUSION

WHEREFORE, based on the foregoing recent developments, the Company respectfully requests a one-month extension of the filing of its 2013 IRP for a new filing date of April 30, 2013. This extension will ensure that stakeholders have reasonable time to review the 2013 IRP

model results prior to selecting a preferred portfolio.

Respectfully submitted this 10th day of January 2013.

By Daniel E Solander/B
Daniel E. Solander
Attorney for PacifiCorp