

D. NEIL PRICE (ISB# 6864)
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
P.O. BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0314
E-mail: neil.price@puc.idaho.gov

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Street Address for Express Mail:
472 W. WASHINGTON
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF PACIFICORP DBA ROCKY MOUNTAIN)	CASE NO. PAC-E-16-04
POWER TO CANCEL SCHEDULE 117,)	
RESIDENTIAL REFRIGERATOR)	
RECYCLING PROGRAM)	STAFF'S MOTION FOR
)	COMMISSION ACCEPTANCE
)	OF COMMENTS FILED AFTER
)	THE 21-DAY COMMENT
)	DEADLINE

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of Record, D. Neil Price, Deputy Attorney General, to submit the foregoing *Motion for Acceptance of Comments Filed After the 21-day Comment Deadline*.

BACKGROUND

On January 27, 2016, PacifiCorp dba Rocky Mountain Power ("Rocky Mountain" or "Company") filed an Application, pursuant to *Idaho Code* §§ 61-301, 61-307, 61-622, 61-623 and Commission Rules of Procedure 52 and 201, IDAPA 31.01.01.052 and .201, *et seq.*, seeking authorization to cancel Electric Service Schedule No. 117 ("Program"), Residential Refrigerator Recycling Program.¹

¹ On December 3, 2015, the Company filed Tariff Advice No. 15-05 requesting authorization to suspend the Program due to the Program vendor, Jaco Environmental ("Jaco"), going out of business. Jaco contacted the Company to inform it that Jaco would no longer be able to perform its contractual duties for the Program. The Commission approved the suspension of the Program on December 7, 2015.

STAFF'S MOTION FOR COMMISSION
ACCEPTANCE OF COMMENTS FILED
AFTER THE 21-DAY COMMENT DEADLINE

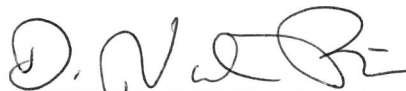
On February 3, 2016, the Commission issued a Notice of Application and Modified Procedure with a 21-day comment period. *See* Order No. 33462.

STAFF'S MOTION

On February 29, 2016, Commission Staff ("Staff") filed its comments in the above-titled case. Staff acknowledges that its filing was not made within the 21-day comment period established by the Commission. Due to a clerical error, the comment deadline was listed as March 2, 2016, on the Intranet page for Case No. PAC-E-16-04. Staff proceeded in accordance with the March 2, 2016 deadline for written comments.

Staff first learned of the clerical error on February 29, 2016, and immediately filed its comments on February 29, 2016. Therefore, Staff respectfully requests that the Commission accept Staff's comments filed after the 21-day comment deadline.

Respectfully submitted this 29th day of February 2016.

A handwritten signature in black ink, appearing to read "D. Neil Price", is written over a horizontal line.

D. Neil Price
Deputy Attorney General

N:PAC-E-16-04_np_Motion

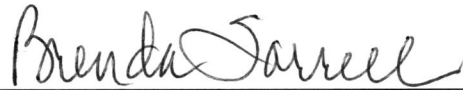
CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 29th DAY OF FEBRUARY 2016, SERVED THE FOREGOING **STAFF'S MOTION FOR COMMISSION ACCEPTANCE OF COMMENTS FILED AFTER THE 21-DAY COMMENT DEADLINE**, IN CASE NO. PAC-E-16-04, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

TED WESTON
MICHAEL SNOW
ROCKY MOUNTAIN POWER
1407 WEST NORTH TEMPLE STE 330
SALT LAKE CITY UT 84116
E-MAIL: ted.weston@pacificorp.com
michael.snow@pacificorp.com

DANIEL E SOLANDER
ROCKY MOUNTAIN POWER
1407 WN TEMPLE STE 320
SALT LAKE CITY UT 84116
E-MAIL: Daniel.solander@pacificorp.com

DATA REQUEST RESPONSE CENTER
E-MAIL ONLY:
datarequest@pacificorp.com



SECRETARY