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IDAHO PUBLIC
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Attorneys for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF
ROCKY MOUNTAIN POWER FOR APPROVAL OF
CHANGES TO ITS ELECTRIC SERVICE
SCHEDULES AND PRICE INCREASE FO \$27.7
MILLION, OR APPROXIMATELY 13.7 PERCENT.

PACIFICORP DBA ROCKY MOUNTAIN POWER,

Petitioner-Appellant,

v.

IDAHO PUBLIC UTILITIES COMMISSION,

Respondent.

SUPREME COURT NO.
38930-2011

IDAHO PUBLIC UTILITIES
COMMISSION NO.
PAC-E-10-07

**ROCKY MOUNTAIN
POWER'S RESPONSE TO
THE COMMISSION
STAFF'S OBJECTION
TO PROPOSED AGENCY'S
RECORD ON APPEAL AND
REQUEST FOR ADDITION**

PacifiCorp d/b/a Rocky Mountain Power (“Rocky Mountain Power” or the “Company”), by and through the undersigned attorneys of record, hereby submits its Response to the Commission Staff’s Objection to Proposed Agency’s Record on Appeal and Request for Addition.

After consideration of Commission Staff’s objections and reviewing the relevant portions of the proposed record on appeal served by the Commission Secretary on August 17, 2011, Rocky Mountain Power hereby agrees to the removal from the proposed record of those exhibits identified by Staff in their Motion for deletion, **EXCEPT** for the following:

From PacifiCorp dba Rocky Mountain Power

Volume I:

Exhibit 1 - Steven R. McDougal – Revenue Requirement Summary

Exhibit 2.6 – Depreciation & Amortization Adjustments

Exhibit 2.8 – Rate Base Adjustments

Volume II:

Exhibit 2 B.10 – Plant Held for Future Use

Volume III:¹

¹ Staff recommended exclusions to Volume III are limited to Exhibits 2 B.19 (Deferred Income Tax Balance), 2B.20 (Customer Advances), 4 (LGAR Calculation) , 78 and 79 (except for pp. 11.5, 11.5.1, 11.7.1, 11.8.1).

Exhibit 79 (pp 1.0-2.2)² – Steven R. McDougal – (Year End) Results of Operation

Summary

These exhibits directly reference the Populus to Terminal Transmission and/or provide valuable context for the Idaho Supreme Court's review of the Commission's decision. Furthermore, the Court will not be unduly burdened by the inclusion of the forty-four (44) pages comprising these exhibits. The aforementioned exhibits are relevant to the issue on appeal and should remain in the record.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission deny Staff's request to remove the aforementioned exhibits from the proposed record on appeal.

Dated this 16th day of September, 2011.

ROCKY MOUNTAIN POWER



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² The Commission Staff did not object to Exhibit 79, pp. 11.5, 11.5.1, 11.7.1, 11.8.1

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September, 2011, caused to be served, a true and correct copy of *Rocky Mountain Power's Response to The Commission Staff's Objection to Proposed Agency's Record On Appeal and Request For Addition* to the following:

Via Hand Delivery

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