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March 18, 2009

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160 E 300 S – Box 146751
Salt Lake City, UT 84114-6751

Cheryl Murray
Committee of Consumer Services
160 East 300 South
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RE: UT Docket No. 08-035-95
Joint DPU&CCS 1st Set Data Request (1-16)

Please find enclosed Rocky Mountain Power's Responses to Joint DPU&CCS 1st Set Data Requests 1.1, and 1.3 – 1.15 and Supplemental Response to Joint DPU&CCS 1.2. Provided on the enclosed CD are Attachments 1.2 –(1-2) 1st Supplemental, 1.4 -1, 1.7 –(1-3), and 1.14 –(1-2). Enclosed on the Confidential CD are Confidential Attachments Joint DPU&CCS 1.1, 1.4 -2, 1.6, 1.9, and 1.12. The Confidential attachments are being provided to parties who have signed a confidentiality agreement pursuant to the protective order in this case.

If you have any questions, please call Barry Bell at (801) 220-4985.

Sincerely,

A handwritten signature in black ink that reads "Dave Taylor / etw".

Dave Taylor
Manager, Regulation

Enclosure

C.c.: Gary Dodge/UAE
Neal Townsend/UAE
Kevin Higgins/UAE

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.1

Joint DPU&CCS Data Request 1.1

Please provide copies of all documents, memos, presentations and analysis used in the discussions with Stefan Bird, Robert Lasich, and Gregory Abel in deciding to cancel the Lake Side 2 project.

Response to Joint DPU&CCS Data Request 1.1

Rocky Mountain Power objects to this request on the ground that it requests production of information that is subject to the attorney client communication privilege and the work product protection. Without waiving and subject to these privileges and protections, Rocky Mountain Power provides the following information:

The only document reviewed by Stefan Bird, Rob Lasich and Greg Abel in deciding to terminate the Master Development, Engineering, Procurement and Construction Agreement for Lake Side 2 was a confidential memorandum dated February 11, 2009, prepared by Spencer Young, Senior Contracts Attorney; Greg Duvall, Director Long Range Planning and Net Power Costs; Stacey Kusters, Director Origination and Long-term Strategy; and Stefan Bird, Senior Vice President, Commercial and Trading of PacifiCorp Energy. This memorandum is both a privileged attorney client communication and protected work product prepared in anticipation of litigation. Rocky Mountain Power is not willing to waive the privileges and protections with regard to this memorandum and will not produce it. However, without waiving and subject to the foregoing objection, Rocky Mountain Power is willing to provide the confidential business analysis reviewed by Messrs. Bird, Lasich and Abel subject to the terms of the Protective Order in this docket. Please refer to Confidential Attachment DPU&CCS 1.1. This confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

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2012 RFP

ROCKY MOUNTAIN POWER

**JOINT DPU&CCS SET 1 DATA REQUEST (1-
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**CONFIDENTIAL (LEVEL YELLOW)
ATTACHMENT JOINT DPU&CCS 1.1**

**PROVIDED ON THE ENCLOSED
CONFIDENTIAL CD**

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.2 1st Supplemental

Joint DPU&CCS Data Request 1.2

Please provide the current load and resource forecasts that were used in the decision process in 1) above.

1st Supplemental Response to Joint DPU&CCS Data Request 1.2

Further to the Company's response to Joint DPU&CCS Data Request 1.2 dated March 9, 2009.

Please refer to Attachment Joint DPU&CCS 1.2 -1 1st Supplemental, which provides the latest peak and energy forecast dated February 2009, and Attachment Joint DPU&CCS 1.2 -2 1st Supplemental, which provides the calculation of the change in load from previous forecast. The factors attributing to the change in the forecast are (1) historical sales data updated through January 2009; (2) most recent economic data from Global Insight used, and (3) industrial forecast update from the Customer Account Managers. This forecasts was in process, but not yet completed, at the time the decision was made to terminate the Lake Side 2 agreement.

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JOINT DPU&CCS SET 1 DATA REQUEST (1-16)

**ATTACHMENT JOINT DPU&CCS 1.2 –(1-2)
1ST SUPPLEMENTAL**

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08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.3

Joint DPU&CCS Data Request 1.3

Please provide an explanation of any differences in the load forecast used in this decision and the published load forecast used in the IRP presentation.

Response to Joint DPU&CCS Data Request 1.3

Please refer to the Company's response to Joint DPU&CCS Data Request 1.2.

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.4

Joint DPU&CCS Data Request 1.4

Please provide any additional analysis, work papers, or information used to evaluate the Lake Side 2 cancelation. This should include comparisons to the options available in the 2008 RFP.

Response to Joint DPU&CCS Data Request 1.4

Please refer to Attachment Joint DPU&CCS 1.4 -1 and Confidential Attachment Joint DPU&CCS 1.4 -2. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

The Lake Side 2 project, which resulted from the 2012 Request for Proposal as the most favorable proposal, was compared to economics in the proposals in the 2008 All Source Request for Proposal. Please refer to Confidential Attachment Joint DPU&CCS 1.4 -2, spreadsheet entitled "Attach Joint DPU&CCS 1.4 -2b CONF.xls". Please note that information that was not available on February 11, 2009, but has since become available as the Company continues to evaluate how to meet its resource needs is also included in Confidential Attachment Joint DPU&CCS 1.4 -2.

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**JOINT DPU&CCS SET 1 DATA REQUEST (1-
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ATTACHMENT JOINT DPU&CCS 1.4 -1

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**JOINT DPU&CCS SET 1 DATA REQUEST (1-
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**CONFIDENTIAL (LEVEL YELLOW)
ATTACHMENT JOINT DPU&CCS 1.4 -2**

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08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.5

Joint DPU&CCS Data Request 1.5

Please provide a complete analysis and evaluation of the proposed “bridging strategy” that has been proposed to meet the anticipated shortage through 2014.

Response to Joint DPU&CCS Data Request 1.5

Please refer to the Company’s responses to Joint DPU&CCS Data Requests 1.1 and 1.4.

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.6

Joint DPU&CCS Data Request 1.6

Please specify how much of the bridging strategy relies on Front Office Transmission.

Response to Joint DPU&CCS Data Request 1.6

Please refer to Confidential Attachment Joint DPU&CCS 1.6. This confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

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ROCKY MOUNTAIN POWER

**JOINT DPU&CCS SET 1 DATA REQUEST (1-
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**CONFIDENTIAL (LEVEL YELLOW)
ATTACHMENT JOINT DPU&CCS 1.6**

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08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.7

Joint DPU&CCS Data Request 1.7

Please provide additional detail concerning the additional transmission capacity through Mona and through the Utah – Nevada border location.

Response to Joint DPU&CCS 1.7

The Company relied on the system impact studies which were requested by PacifiCorp merchant to PacifiCorp Transmission through the Open Access Same Time Information System (OASIS).

Please refer to Attachments Joint DPU&CCS 1.7 -1 through -3:

1. the existing 264 MW was originally issued June 12, 2007 (Attachment Joint DPU&CCS 1.7 -1),
2. the incremental 250 MW at Mona starting in 2009 was issued December 2, 2008 (Attachment Joint DPU&CCS 1.7 -2), and
3. the 265 MW at the Nevada Utah Border was issued in February 4, 2009 (Attachment Joint DPU&CCS 1.7 -3).

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**JOINT DPU&CCS SET 1 DATA REQUEST (1-
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ATTACHMENT JOINT DPU&CCS 1.7 –(1-3)

PROVIDED ON THE ENCLOSED CD

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.8

Joint DPU&CCS Data Request 1.8

Please provide additional information concerning the source of the purchased power available through the additional transmission. What is the source of this new resource?

Response to Joint DPU&CCS Data Request 1.8

The purchase power will be sourced through market purchases at Four Corners, Mona and the Nevada Utah Border. The source for purchases located at Four Corners may come from generation in Arizona, California or Nevada. The source for purchases located at Mona may come from Utah or California. The source for purchases located at the Nevada Utah Border may come from California or Nevada. However, due to the multiple purchases and sales among many market participants, the generation supporting any of these purchases as documented with electronic tags could be located anywhere throughout the Western Interconnection.

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.9

Joint DPU&CCS Data Request 1.9

Please provide additional information concerning the timeline of the negotiations with Summit and CH2M Hill and the costs that have been incurred to date by the Company as a result of the 2012 RFP.

Response to Joint DPU&CCS Data Request 1.9

Please refer to Confidential Attachment Joint DPU&CCS 1.9. This confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

The Company has not incurred any costs to date with regards to the development of the Lake Side 2 project site. Summit has provided a proposal to sell to the Company the development assets which the Company is reviewing. The Company believes that the development assets have value and to the extent they can be used in the 2008 All Source RFP or otherwise in the future, they should be purchased.

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ATTACHMENT JOINT DPU&CCS 1.9**

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08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.10

Joint DPU&CCS Data Request 1.10

Please provide additional information concerning the Air Permit application.
Does the company intend to continue with this process or terminate the Federal Land Manager and public comment periods?

Response to Joint DPU&CCS Data Request 1.10

PacifiCorp completed the process of obtaining one year of meteorological data January 23, 2009.

The final modeling report was delivered to Utah Division of Air Quality on January 28, 2009.

The Utah Division of Air Quality distributed the Final Report January 29, 2009 to the three Federal Land Managers (National Park Service, US Forest Service and Bureau of Land Management) and EPA Region VIII. Their 60 day comment period ends April 5, 2009.

PacifiCorp is evaluating whether to continue the application process for obtaining an air permit in light of the recent termination of the Lake Side 2 project agreement.

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.11

Joint DPU&CCS Data Request 1.11

The application includes \$19.4 million in capitalized internal costs for this project. How much of this internal amount has already been expended? Can any information obtained from the current process be used if Lake Side 2 is modified or proposed in future projects? (such as specific cost/benefit analysis, permits, etc).

Response to Joint DPU&CCS Data Request 1.11

Approximately \$292,500 has been expended by PacifiCorp for preliminary planning and permitting work, legal fees on negotiations, meteorological tower data acquisition and fence. A further \$19,700 will be spent on removal of the tower and fence. An amount to be determined could be spent on acquiring development assets from Summit Vineyard.

The meteorological data is useful for any development at this site. The preliminary permit work was specific to Lake Side 2 and would be applicable if future development at the site is similar to that resource in the event the Summit Vineyard assets are not acquired.

It is expected that any development assets prepared by and acquired from Summit Vineyard would have value for the development and construction of a similar resource at the Lake Side site.

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March 18, 2009
Joint DPU&CCS Data Request 1.12

Joint DPU&CCS Data Request 1.12

Please provide a comparison of the proposed related costs for Lake Side 2 with actual related costs for completed projects.

Response to Joint DPU&CCS Data Request 1.12

Please refer to Confidential Attachment Joint DPU&CCS 1.12 which lists proposed capital costs for Lake Side 2 as compared to actual capital costs for Lake Side and Currant Creek. In cases where the differing nature of the three projects had a cost grouped under the “EPC or Developer cost” for one project, that same cost was grouped as an “EPC or Developer cost” for all three projects. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

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**JOINT DPU&CCS SET 1 DATA REQUEST (1-
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**CONFIDENTIAL (LEVEL YELLOW)
ATTACHMENT JOINT DPU&CCS 1.12**

**PROVIDED ON THE ENCLOSED
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08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.13

Joint DPU&CCS Data Request 1.13

Please provide an explanation as to why the Company feels the Commission must approve the total project costs, despite the known risks, when the Company has acknowledged that the Commission is authorized to approve subject to conditions.

Response to Joint DPU&CCS Data Request 1.13

The Company objects to this request on the ground that it calls for a legal conclusion. Without waiving this objection, the Company states that the pre-approval proceeding created by the Energy Resource Procurement Act should be the forum for prudence review of total project costs. The Company also refers to the Confidential Rebuttal Comments of Rocky Mountain Power and Notice of Termination of Agreement filed in this docket on February 12, 2009.

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.14

Joint DPU&CCS Data Request 1.14

Please provide the system impact study prepared by PacifiCorp Transmission that was used in evaluating proceeding with the Lakeside 2 project.

Response to Joint DPU&CCS Data Request 1.14

Please refer to Attachments DPU&CCS 1.14 -1 and 1.14 -2.

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ATTACHMENT JOINT DPU&CCS 1.14 –(1-2)

PROVIDED ON THE ENCLOSED CD

08-035-95/Rocky Mountain Power
March 18, 2009
Joint DPU&CCS Data Request 1.15

Joint DPU&CCS Data Request 1.15

Please provide any documentation showing the latest estimates by WECC for the load balance in the western United States.

Response to Joint DPU&CCS Data Request 1.15

The latest WECC power supply assessment, published November 5, 2008, can be accessed from WECC's Web site. The document Web address is:

http://www.wecc.biz/documents/library/LRS/PSA%20Final%20%205nov08_2.pdf