

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Division's Annual Review
and Evaluation of the Electric Lifeline
Program, HELP

AARP'S RESPONSE TO LIGHT AND
TRUTH'S DATA REQUEST TO AARP

Docket No. 04-035-21

AARP responds to Light and Truth's first set of Data Requests to AARP as follows:

OBJECTION

AARP objects to the Light and Truth (hereinafter "L&T") data requests and contends that the information sought therein is beyond the scope and limits of discovery as specified in the Utah Rules of Civil Procedure. Specifically, the requested data is cumulative and duplicative of information found in the filings of the subject case/docket files. Additionally, the case/docket files are a source from which L&T may obtain the data requested in a more convenient, less burdensome, and less expensive manner. Without waiving the foregoing objection, AARP answers as follows:

RESPONSES

1. Is it the position of AARP that the HELP program is in the public interest?

Response: Yes. AARP's position is consistent with what the Commission has found and ordered in prior dockets regarding the HELP program being just and reasonable and in the public interest. Additionally, AARP is a signatory to the Stipulation filed in the subject docket and submits, consistent with the changes identified in the Stipulation, that the HELP program continues to satisfy the criteria identified by the Commission in prior Orders, and continues to be just and reasonable and in the public interest.

2. Please support and demonstrate your answer to the previous question.

Response: See the response to 1. above.

3. In the previous two questions, what is your definition of “public?”

Response: Within the parameters of this case AARP’s definition of “public” is consistent with the Commission’s definition and description as specified in its prior Orders considering, authorizing and ordering the implementation of the HELP program.

4. What value will and has the not-HELP recipients received for the surcharges they are required to pay?

Response: See the response to 1. above. Additionally, AARP intends to file testimony, on or before September 16, 2005, in further support of the benefits of the program. The testimony has not been fully developed at this point.

5. Please support and demonstrate your answer to the previous question.

Response: See responses to 1. and 4. above.

6. For the previous two questions, please demonstrate the attributability of your answers to the HELP program.

Response: See responses 1. and 4. above. Additionally, AARP objects to the request as unintelligible.

7. Is it the position of AARP that the HELP program is just and reasonable?

Response: Yes. See also response 1. above.

8. Please support and demonstrate your answer to the previous question.

Response: See response 1. above.

DATED this the _____ day of August, 2005.

Dale F. Gardiner