

**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations))))))))	Docket No. 10-035-124 Sierra Club Data Requests Set 2
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INSTRUCTIONS

1. Responses to any and all of Sierra Club’s data requests should be supplied to Sierra Club as soon as they become available to Rocky Mountain Power.
2. The requests herein shall be deemed to be continuing in nature and Rocky Mountain Power is requested to supplement its responses as necessary and as additional information becomes available.
3. Please reproduce the data request being responded to before the response.

DATA REQUESTS

**SECOND SET OF DATA REQUESTS OF SIERRA CLUB TO ROCKY MOUNTAIN
POWER**

- 1.A. Please provide a detailed description of all recently completed, currently in progress or proposed **environmental** retrofits and steam turbine upgrades, including the following steam plant additions enumerated in McDougal Exhibit RMP___(SRM-3) (Page 8.8.22, 23) (“Environmental retrofits”) and restated as written here:
 - a. NAU U2 Flue Gas Desulfurization Sys
 - b. NAU U1 Flue Gas Desulfurization Sys
 - c. WDK U1 SO2 and PM Emiss Control Upgrade
 - d. DJ U4 SO2 and PM Emission Cntrl Upgrades
 - e. Huntington U1 Clean Air – PM
 - f. Hunter 302 Clean Air – PM
 - g. HTN U1 SO2 & PM Em Cntrl Upgrades
 - h. 302 – Hunter U2 SO2 Project
 - i. U1 – Air Cooled Condenser Replacement

- j. 302 Turbine Upgrade HP/IP/LP
- k. HTR U1 SO2 & PM Em Cntrl Upgrades
- l. JB U3 SO2 & PM Emission Cntrl Upgrades
- m. Wyodak U1 OH Clean Air – NOX
- n. NAU U2 NOx LNB – Clean
- o. DJ U3 SO2 & PM Emission Cntrl Upgrades
- p. Htg U1 Clean Air –NOx
- q. Naughton U1 NOx LNB Build – Clean Air
- r. Hunter U2 NOx LNB – Clean Air
- s. UO FGD Reagent Loadout Facility
- t. 303 Hunter 3 Wet Stack Upgrades
- u. DJ U3 Low Nox Burners
- v. JB U4 SO2 & PM Em Cntrl Upgrades

- 1.B. Please provide a detailed description of steam plant additions not expressly listed above that are expected to be included in the requested rate base for the current docket.
2. Please provide total capital costs, fixed and variable operating costs, and energy requirements for the above environmental retrofits.
3. Please provide all documents prepared by or under the control of the company that discuss the necessity and prudence of the above environmental retrofits, including alternative energy resources considered or rejected.
4. Please provide all documents relied on by any witness in this proceeding that discuss or describe the necessity and prudence of the above environmental retrofits, including alternative energy resources considered or rejected.
5. Please provide citations of each and every state or federal statute or regulation requiring the environmental retrofits. Please provide copies of each and every settlement or other agreement requiring the environmental retrofits.
6. Please provide any planning studies conducted by the company or contractors that explore compliance alternatives with state or federal statutes, regulations or settlements.
7. Please provide any studies conducted by the company or contractors that examine the economic viability, either short or long term, of the plants that have or are planned to have environmental retrofits.
8. Please provide any documents prepared by or for the company examining environmental compliance requirements for the following federal regulations:
 - a. Clean Air Act Regional Haze Rule

- b. National Ambient Air Quality Standards (NAAQS) for the one-hour SO₂ standard
 - c. National Ambient Air Quality Standards (NAAQS) for NO₂
9. Please provide any documents prepared by or for the company examining environmental compliance requirements for the following proposed federal regulations:
- a. Clean Air Act Utility Steam Air Toxics Rule (“National Emission Standards for Hazardous Air Pollutants from Coal- and Oil-fired Electric Utility Steam Generating Units [etc...]”)
 - b. Clean Water Act Cooling Water Intake Structures Rule (“National Pollutant Discharge Elimination System--Cooling Water Intake Structures at Existing Facilities and Phase I Facilities; Proposed Rule”)
 - c. Resource Conservation and Recovery Act Coal Combustion Residuals Rule (“Hazardous and Solid Waste Management System; Identification and Listing of Special Wastes; Disposal of Coal Combustion Residuals From Electric Utilities; Proposed Rule”)
 - d. National Ambient Air Quality Standards (NAAQS) for ozone
10. Please provide any documents prepared by or for the company examining environmental compliance requirements for the following emerging federal regulations:
- a. Clean Water Act Effluent Limitation Guidelines
 - b. National Ambient Air Quality Standards (NAAQS) for particulate matter (PM_{2.5})
11. Please provide, for the *last* ten years at each existing steam plant owned, in whole or in part, or operated by the company actual capital, fuel, and operating and maintenance expenditures at each thermal electrical generating unit.
12. Please provide, for the *next* ten years at each existing steam plant owned, in whole or in part, or operated by the company expected capital, fuel, and operating and maintenance expenditures at each thermal electrical generating unit.
13. Please provide a detailed description of the MidAmerican Energy Holdings Company’s (PacifiCorp’s parent company) REPLACES program, referenced in A. Richard Walje’s presentation to the American Bar Association’s 40th Annual Conference on Environmental Law.
14. Please provide all documents prepared by or for MidAmerican Energy Holdings Company (MEHC), PacifiCorp or any other affiliate of MEHC that describe the economic, environmental or other costs or benefits of the REPLACES program; compares its proposed actions, costs, benefits, and results to the requirements of

federal or state statutes or regulations; or, compare its proposed actions, costs, benefits, or results to those of the environmental upgrades performed or proposed by the company.

15. Please provide all documents prepared by or for MEHC, PacifiCorp or any other affiliates of MEHC that examine the economic, environmental or other costs or benefits of the REPLACES program specifically to PacifiCorp or to Rocky Mountain Power.

Respectfully submitted,

Original signed by:

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th of April, 2011, a true copy of the foregoing document was sent via email to the following:

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