BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of)	
Rocky Mountain Power for Authority)	Docket No. 10-035-124
to Increase its Retail Electric Utility)	
Service Rates in Utah and for)	Sierra Club
Approval of Its Proposed Electric)	Data Requests
Service Schedules and Electric)	Set 3
Service Regulations)	
)	

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 THIRD SET OF DATA REQUESTS OF SIERRA CLUB TO ROCKY MOUNTAIN POWER

3.1. State whether the company, or any party working on behalf of the company, performed any analysis as part of the 2008 or 2011 Integrated Resource Plans (IRP) preparation to test for the cost effectiveness of alternatives to the environmental upgrades at issue in this docket. If yes, please list the specific alternatives that were modeled. If no, explain why no alternatives where modeled.

3.2. Please provide inputs, outputs, and any other documentation related to the analyses which were responsive to question 3.1.

3.3. For each analysis responsive to question 3.1, please provide a detailed description of the alternatives considered. If included as part of a larger document, please identify the specific page on which this was provided.

3.4. Please provide price forecasts for natural gas, coal, and carbon dioxide used by the company in analyses which were responsive to question 3.1. If included as part of a larger document, please identify the specific page on which this was provided.

3.5. For each analysis which was responsive to question 3.1, please list the type, year, and cost of any major (over one million dollars) expected capital expenditure included as part of that analysis over the analysis period. If included as part of a larger document, please identify the specific page on which this was provided.

3.6. For each analysis which was responsive to the question 3.1, please provide by year expected costs for each modeled scenario, net present value of revenue requirement (NPVRR), and any metrics of risk or uncertainty used to evaluate scenarios. If included as part of a larger document, please identify the specific page on which this was provided.

3.7. Hunter 2: Please admit or deny whether, as part of its decision to make the capital expenditures on Hunter 2 that are requested in this docket, the company *did not* evaluate the cost effectiveness of those expenditures in conjunction with the cost of also installing:

a) ACI at Hunter 2;

b) SCR at Hunter 2;

c) both SCR and ACI at Hunter 2;

d) both SCR and ACI at Hunter 2 as well as remediating coal combustion residual impoundments or other settling or storage ponds.

3.8. Dave Johnston 3 (DJ3): Please admit or deny whether, as part of its decision to make the capital expenditures on Dave Johnston 3 that are requested in this docket, the company *did not* evaluate the cost effectiveness of those expenditures in conjunction with the cost of also installing:

a) ACI at DJ3;

b) SCR at DJ3;

c) a recirculating cooling system (cooling tower or air cooled condenser) at DJ3;

d) both SCR and ACI at DJ3;

e) SCR, ACI, and recirculating cooling at DJ3;

f) SCR, ACI, and recirculating cooling at DJ3 as well as remediating coal combustion residual impoundments or other settling or storage ponds.

3.9. Wyodak 1: Please admit or deny whether, as part of its decision to make the capital expenditures on Wyodak 1 that are requested in this docket, the

company *did not* evaluate the cost effectiveness of those expenditures in conjunction with the cost of also installing:

a) ACI at Wyodak 1;

b) SCR at Wyodak 1;

c) both SCR and ACI at Wyodak 1.

3.10. Jim Bridger 1 (JB1): Please admit or deny whether, as part of its decision to make the capital expenditures on Jim Bridger 1 that are requested in this docket, the company *did not* evaluate the cost effectiveness of those expenditures in conjunction with the cost of also installing:

- a) ACI at JB1;
- b) SCR at JB1;
- c) a fabric filter baghouse at JB1;
- d) both SCR and ACI at JB1;

e) SCR, ACI, and a baghouse at JB1;

f) SCR, ACI, and a baghouse at JB1 as well as remediating coal combustion residual impoundments or other settling or storage ponds.

3.11. Jim Bridger 3 (JB3): Please admit or deny whether, as part of its decision to make the capital expenditures on Jim Bridger 3 that are requested in this docket, the company *did not* evaluate the cost effectiveness of those expenditures in conjunction with the cost of also installing:

a) ACI at JB3;

b) SCR at JB3;

c) a fabric filter baghouse at JB3;

d) both SCR and ACI at JB3;

e) SCR, ACI, and a baghouse at JB3;

f) SCR, ACI, and a baghouse at JB1 as well as remediating coal combustion residual impoundments or other settling or storage ponds.

3.12. Naughton 1: Please admit or deny whether, as part of its decision to make the capital expenditures on Naughton 1 that are requested in this docket, the company *did not* evaluate the cost effectiveness of those expenditures in conjunction with the cost of also installing:

a) ACI at Naughton 1;

b) SCR at Naughton 1;

c) a fabric filter baghouse at Naughton 1;

d) FGD at Naughton 1;

e) both FGD and baghouse at Naughton 1;

f) both SCR and FGD at Naughton 1;

g) SCR, FGD and baghouse Naughton 1;

h) SCR, FGD, baghouse, and ACI Naughton 1.

3.13. Naughton 2: Please admit or deny, whether, as part of its decision to make the capital expenditures on Naughton 2 that are requested in this docket, the company *did not* evaluate the cost effectiveness of those expenditures in conjunction with the cost of also installing:

- a) ACI at Naughton 2;
- b) SCR at Naughton 2;
- c) a fabric filter baghouse at Naughton 2;
- d) both SCR and ACI at Naughton 2;
- e) SCR, ACI, and a baghouse at Naughton 2.

3.14. For any denials responsive to questions 3.7 through 3.13, please provide documentation supporting or not supporting a finding of cost effectiveness.

3.15. For any denials responsive to questions 3.7 through 3.13, please provide analyses or work papers supporting or not supporting a finding of cost effectiveness.

Respectfully submitted,

<u>Original signed by:</u>

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th of May, 2011, a true copy of the

foregoing document was sent via email to the following:

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