



- e. The assumed cost of replacement power, and the type of replacement power chosen (as per slide 3);
  - f. Assumed revenues from energy and capacity markets, as applicable (as per slide 11)
- 5.2. Regarding the Brattle Study, please provide the assumed date upon which units would be required to comply with the following EPA regulations:
- a. The Regional Haze Rule;
  - b. The Transport Rule (as per slide 14);
  - c. “Stricter” Ozone NAAQS (as per slide 14);
  - d. “new regulations to more tightly control... Criteria Air Pollutants” of SO<sub>x</sub> (as per slide 13);
  - e. “new regulations to more tightly control... Criteria Air Pollutants” of NO<sub>x</sub> (as per slide 13);
  - f. “new regulations to more tightly control... Criteria Air Pollutants” of particulates (as per slide 13);
  - g. “Hazardous air pollutants (HAPs)” (as per slide 13);
  - h. “Cooling Water Discharge” (as per slide 13);
  - i. “Coal combustion byproducts” (as per slide 13);
- 5.3. Regarding the Brattle Study, for each EPA regulation listed in the above question, please provide a list of the PacifiCorp owned or partially-owned coal-fired generating units which are assumed to comply with the regulation.
- 5.4. Regarding the Brattle Study, for each PacifiCorp owned or partially-owned coal-fired generating unit, please provide the assumed cost (where calculated) of:
- a. FGD (“scrubbers”);
  - b. SCR;
  - c. SNCR;
  - d. Low NO<sub>x</sub> burners;
  - e. Overfire air;
  - f. ACI;
  - g. The assumed cost of mitigating once-through cooling;
  - h. The assumed cost of mitigating coal ash waste;
- 5.5. Regarding the Brattle Study, please provide:
- a. Assumed natural gas prices through the analysis period;
  - b. Assumed CO<sub>2</sub> prices through the analysis period;
  - c. Workpapers or product papers
  - d. Updated analysis results

## Document Request

- 5.6.** Please provide all reports, memoranda, presentations, or other documents provided to or considered by RMP's Board of Directors (and any subcommittee of that Board) within the past seven years that refer or relate to:
- a. The status of RMP's or Pacificorp's coal-fired generating stations (the Coal Plants);
  - b. Past, present or future environmental compliance of the Coal Plants;
  - c. Litigation or settlements concerning the Coal Plants, to the extent not covered by attorney-client privilege;
  - d. Past, present or future need for the Coal Plants, or the need for or plans for capital additions to the Coal Plants, whether for environmental compliance or otherwise; and,
  - e. Any other matter that could affect the costs or output of the Coal Plants.
- 5.7.** To the extent not already provided in response to request No. 1, please provide all agendas, handouts, minutes, documents or notes prepared for or resulting from each meeting of RMP's Board of Directors (and any subcommittee of that Board) at which the matters listed in request No.1 were discussed in any way.
- 5.8.** Please provide all reports, memoranda, presentations, or other documents provided to stockholders, investors, banks, investment firms, investment brokers or dealers, investment analysts, bond rating agencies or the like by RMP, Pacificorp or MidAmerican Energy Holding Company (MEHC) within the past seven years during which the following were discussed in any way:
- a. The status of RMP's or Pacificorp's coal-fired generating stations (the Coal Plants);
  - b. Past, present or future environmental compliance of the Coal Plants;
  - c. Litigation or settlements concerning the Coal Plants, to the extent not covered by attorney-client privilege;
  - d. Past, present or future need for the Coal Plants, or the need for or plans for capital additions to the Coal Plants, whether for environmental compliance or otherwise; and,
  - e. Any other matter that could affect the costs or output of the Coal Plants.
- 5.9** To the extent not already provided in response to request No. 3, please provide any agendas, handouts, minutes or notes prepared for or

resulting from each meeting of RMP, Pacificorp or MEHC with stockholders, investors, banks, investment firms, investment brokers or dealers, investment analysts, bond rating agencies or the like during which the matters listed in request No.3 were discussed in any way.

- 5.10 Please provide copies of RMP's, Pacificorp's and MEHC's SEC filings and annual reports to shareholders for the past seven years.
- 5.11 To the extent not already provided in response to this request or another, please provide any analyses, performed by or for RMP, Pacificorp or MEHC during the past seven years, of the need for the Coal Plants, the need for and cost of necessary or potentially necessary capital additions to the Coal Plants, or the environmental effects of and risks from continued operation of the Coal Plants. If already provided in response to another request, please identify the request and the relevant document provided.

Respectfully submitted,

*Original signed by:* \_\_\_\_\_

Gloria D. Smith, Senior Attorney  
Sierra Club  
85 Second Street, Second floor  
San Francisco, CA 94105  
(415) 977-5532  
gloria.smith@sierraclub.org  
**Counsel for the Sierra Club**

## CERTIFICATE OF SERVICE

I hereby certify that on this 15th of July, 2011, a true copy of the foregoing document was sent via email to the following:

Utah Public Service Commission  
Herber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84114  
[psc@utah.gov](mailto:psc@utah.gov)

Dave Taylor  
Mark C. Moench  
Yvonne R. Hogle  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, UT 84111  
[dave.taylor@pacificorp.com](mailto:dave.taylor@pacificorp.com)  
[mark.moench@pacificorp.com](mailto:mark.moench@pacificorp.com)  
[yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)  
[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

Paul Proctor  
Assistant Attorney General  
Heber M. Wells Bldg., 5<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111  
[pproctor@utah.gov](mailto:pproctor@utah.gov)

Michele Beck  
Cheryl Murray  
Dan Gimble  
Danny Martinez  
Utah Office of Consumer Services  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, UT 84111  
[mbeck@utah.gov](mailto:mbeck@utah.gov)  
[cmurray@utah.gov](mailto:cmurray@utah.gov)  
[dgimble@utah.gov](mailto:dgimble@utah.gov)  
[dannymartinez@utah.gov](mailto:dannymartinez@utah.gov)

Chris Parker  
William Powell  
Dennis Miller  
Division of Public Utilities  
Heber M. Wells Building  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[chrisparker@utah.gov](mailto:chrisparker@utah.gov)  
[wpowell@utah.gov](mailto:wpowell@utah.gov)  
[dennis.miller@utah.gov](mailto:dennis.miller@utah.gov)

Patricia Schmid  
Felise Thorpe Moll  
Assistant Attorney General  
Utah Division of Public Utilities  
Heber M. Wells Bldg., 5<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111  
[pschmid@utah.gov](mailto:pschmid@utah.gov)  
[ftorpemoll@utah.gov](mailto:ftorpemoll@utah.gov)

Stephen J. Baron  
J. Kennedy & Associates  
570 Colonial Park Dr., Ste. 305  
Roswell, GA 30075  
[sbaron@jkenn.com](mailto:sbaron@jkenn.com)

Kurt J. Boehm, Esq.  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

Brian W. Burnett, Esq.  
CALLISTER NEBEKER &  
McCULLOUGH  
Zions Bank Building  
10 East South Temple, Suite 900  
Salt Lake City, Utah 84133  
[brianburnett@cnmlaw.com](mailto:brianburnett@cnmlaw.com)

Gary A. Dodge  
Hatch James & Dodge  
10 West Broadway, Suite 400  
Salt Lake City, UT 84101  
[gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)

Sophie Hayes  
Sarah Wright  
Utah Clean Energy  
1014 Second Ave.  
Salt Lake City, UT 84103  
[sophie@utahcleanenergy.org](mailto:sophie@utahcleanenergy.org)  
[sarah@utahcleanenergy.org](mailto:sarah@utahcleanenergy.org)

Nancy Kelly  
Western Resource Advocates  
9463 N. Swallow Rd.  
Pocatello, ID 83201  
[nkelly@westernresources.org](mailto:nkelly@westernresources.org)

Sharon M. Bertelsen  
Ballard Spahr LLP  
201 So. Main Street, Ste. 800  
Salt Lake City, UT 84111  
[bertelsens@ballardspahr.com](mailto:bertelsens@ballardspahr.com)

Janee Briesemeister  
AARP  
98 San Jacinto Blvd., Ste. 750  
Austin, TX 78701  
[jbriesemeister@aarp.org](mailto:jbriesemeister@aarp.org)

Steve W. Chriss  
Wal-Mart Stores, Inc.  
2001 SE 10<sup>th</sup> Street  
Bentonville, AR 72716-0550  
[stephen.chriss@wal-mart.com](mailto:stephen.chriss@wal-mart.com)

Rob Dubuc  
Western Resource Advocates  
150 South 600 East, Suite 2A  
Salt Lake City, UT 84102  
[rdubuc@westernresources.org](mailto:rdubuc@westernresources.org)

Kevin Higgins  
Neal Townsend  
Energy Strategies  
39 Market Street, Suite 200  
Salt Lake City, UT 84101  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)  
[ntownsend@energystrat.com](mailto:ntownsend@energystrat.com)

Ryan L. Kelly  
Kelly & Bramwell, P.C.  
11576 South State St. Bldg. 1002  
Draper, UT 84020  
[ryan@kellybramwell.com](mailto:ryan@kellybramwell.com)

Gerald H. Kinghorn  
Jeremy R. Cook  
Parsons Kinghorn Harris, P.C.  
111 East Broadway, 11th Floor  
Salt Lake City, Utah 84111  
[ghk@pkhlawyers.com](mailto:ghk@pkhlawyers.com)  
[jrc@pkhlawyers.com](mailto:jrc@pkhlawyers.com)

Sonya L. Martinez  
Betsy Wolf  
Salt Lake Community Action  
Program  
764 South 200 West  
Salt Lake City, UT 84101  
[smartinez@slcap.org](mailto:smartinez@slcap.org)  
[bwolf@slcap.org](mailto:bwolf@slcap.org)

Captain Shayla L. McNeill  
Ms. Karen S. White  
AFLOA/JACL-ULFSC  
139 Barnes Ave, Suite 1  
Tyndall AFB, FL 32403  
[Shayla.mcneill@tyndall.af.mil](mailto:Shayla.mcneill@tyndall.af.mil)  
[Karen.white@tyndall.af.mil](mailto:Karen.white@tyndall.af.mil)

Steven Michel  
Western Resource Advocates  
2025 Senda de Andres  
Santa Fe, NM 87501  
[smichel@westernresources.org](mailto:smichel@westernresources.org)

Bruce Plenk  
Law Office of Bruce Plenk  
2958 N St Augustine Pl  
Tucson, AZ 85712  
[blenk@igc.org](mailto:blenk@igc.org)

Mike Legge  
Roger Swenson  
US Magnesium LLC  
238 North 2200 West  
Salt Lake City, UT 84106  
[mlegge@usmagnesium.com](mailto:mlegge@usmagnesium.com)  
[roger.swenson@prodigy.net](mailto:roger.swenson@prodigy.net)

Peter J. Mattheis  
Eric J. Lacey  
Brickfield, Burchette, Ritts & Stone,  
P.C.  
1025 Thomas Jefferson Street, N.W.  
800 West Tower  
Washington, D.C. 2007  
[pjm@bbrslaw.com](mailto:pjm@bbrslaw.com)  
[elacey@bbrslaw.com](mailto:elacey@bbrslaw.com)

Stephen F. Mecham  
Callister Nebeker & McCullough  
10 East South Temple Suite 900  
Salt Lake City, Utah 84133  
[sfmecham@cnmlaw.com](mailto:sfmecham@cnmlaw.com)

Randy N. Parker, CEO  
Leland Hogan, President  
Utah Farm Bureau Federation  
9865 South State Street  
Sandy, UT 84070  
[rparker@fbfs.com](mailto:rparker@fbfs.com)  
[leland.hogan@fbfs.com](mailto:leland.hogan@fbfs.com)

F. Robert Reeder  
William J. Evans  
Vicki M. Baldwin  
Parsons Behle &, Latimer  
201 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
[bobreeder@parsonsbehle.com](mailto:bobreeder@parsonsbehle.com)  
[vbaldwin@parsonsbehle.com](mailto:vbaldwin@parsonsbehle.com)  
[bevans@parsonsbehle.com](mailto:bevans@parsonsbehle.com)

Arthur F. Sandack  
8 East Broadway, Ste 510  
Salt Lake City, Utah 84111  
801-595-1300 office  
801-363-1715 fax  
[asandack@msn.com](mailto:asandack@msn.com)

Holly Rachel Smith, PLLC  
Hitt Business Center  
3803 Rectortown Road  
Marshall, VA 20115  
[holly@raysmithlaw.com](mailto:holly@raysmithlaw.com)

*Original signed by:* \_\_\_\_\_

Jeff Speir  
Program Assistant  
Sierra Club Environmental Law Program