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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Complaint of Uranium  
One Ticaboo Inc., Against the Ticaboo  
Electric Improvement District for a  
Declaratory Judgment Relating to Contractual  
Rights and Such Other Relief Regarding the  
District's Tariff

Docket No.10-2508-01

**URANIUM ONE TICABOO, INC.'S  
REQUEST FOR PRODUCTION  
OF DOCUMENTS TO TICABOO  
ELECTRIC IMPROVEMENT DISTRICT**

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Pursuant to Utah Admin. Code R. 746-100-8 and Rule 34 of the Utah Rules of Civil Procedure, Uranium One Ticaboo, Inc. ("Uranium One") hereby requests that Ticaboo Electric Improvement District ("TEID"), produce the documents identified below for inspection and copying within 3 days of service, as directed by the Administrative Law Judge, at the offices of Dorsey & Whitney LLP, 136 South Main Street, Suite 1000, Salt Lake City, Utah, 84101.

**DOCUMENTS TO BE PRODUCED**

1. All invoices sent by TEID to the Ticaboo Special Service District ("TSSD"), the LDS Church, and all "non-residential" consumers of electric power, for the period from

January 1, 2010, to the present.

2. Copies of all checks remitted to TEID by TSSD, the LDS Church, and all “non-residential” consumers, from January 1, 2010, to the present.

3. Copies of all documents reflecting payments to TEID by TSSD, the LDS Church, and all non-residential consumers, from January 1, 2010, to the present..

4. Documents showing TSSD’s monthly electric usage from January 1, 2010, to the present.

5. Documents reflecting TSSD’s status as a “commercial” or “residential” consumer of electric services.

6. Documents relied upon by TEID to formulate:

a. the original rate structure as of January 1, 2010;

b. the rate structure adopted on March 11, 2010 and effective April 1<sup>st</sup>, 2010;

and

c. any proposed rate structure.

7. Copies of all correspondence, including emails, between TEID and TSSD from January 1, 2010, to the present.

8. Copies of all correspondence, including emails, between TEID and the LDS Church from January 1, 2010, to the present.

9. Copies of all correspondence, including emails, between TSSD and all non-residential consumers from January 1, 2010, to the present.

10. Documents reflecting all valuable consideration furnished by TEID to Chuck Birrenbach (“Birrenbach”) for services rendered from January 1, 2010, to the present.
11. Minutes of the public meeting held by the TEID on July 20, 2010.
12. Copies of materials distributed to the public at the meeting held July 20, 2010.
13. Copies of all contracts or service agreements which the TEID has entered into since December 1, 2009.
14. All documents reflecting the information requested by the Division of Public Utilities (“DPU”) at the Scheduling Conference held on Monday August 16, 2010, including:
  - a. Monthly fixed costs incurred by TEID since taking on ownership and operation of the system;
  - b. Monthly variable costs incurred by TEID since taking on ownership and operation of the system;
  - c. A summary of the weekly and monthly finances of TEID;
  - d. Monthly electric usage data for each commercial facility (i.e. non-residential) within the Ticaboo townsite, including the LDS Chapel;
  - e. A summary of electric usage data for residential customers within the Ticaboo townsite;
  - f. The maximum draw off of a single-phase meter;
  - g. All calculations used by TEID in creating the original, disputed, and newly proposed rate structures; and
  - h. A square-footage analysis of TEID’s electric service customers within the Ticaboo townsite.

DATED this 19<sup>th</sup> day of August, 2010.

DORSEY & WHITNEY LLP

By: \_\_\_\_\_/s\_\_\_\_\_  
Douglas J. Parry  
*Attorneys for Uranium One Ticaboo, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of August, 2010, a true and correct copy of the foregoing URANIUM ONE TICABOO, INC.S' REQUEST FOR PRODUCTION OF DOCUMENTS TO TICABOO ELECTRIC IMPROVEMENT DISTRICT was served via e-mail, to the following:

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