PUBLIC SERVICE COMMISSION OF UTAH

Docket No. 12-035-92

SIERRA CLUB EXHIBIT 28

Response to WIEC Data Request 22.15 in concurrent Wyoming docket 20000-418-EA-12

20000-418-EA-12/Rocky Mountain Power January 7, 2013 WIEC 22nd Data Request 22.15

WIEC Data Request 22.15

The Company stated the following in Response to WIEC Data Request 1.83: "Retirement of Jim Bridger 3 and 4 would reduce the need to transport thermal resources westward between the proposed Anticline substation and existing Populus substations." Please explain how Company arrived at that conclusion, state the amount of estimated reduction in transmission demand at issue, and provide any supporting studies, data, analyses, and documentation. Please also describe the impact of a Bridger 3 and 4 retirement, if the retirement were to occur at any point in the 2015-2020 time frame, on the Company's proposed Gateway expansion west of Bridger.

Response to WIEC Data Request 22.15

The Company arrived at that conclusion based on the observation that if Jim Bridger units 3 and 4 are offline and not generating there would be no energy to transport from those two units westward to the Populus station. No studies, data analyses, or documentation have been performed.

The impact of Bridger 3 and 4 retirements at any point in the (2015-2020) timeframe and associated impacts to Company's proposed Gateway expansion west of Bridger have not been analyzed or studied.