PUBLIC SERVICE COMMISSION OF UTAH

Docket No. 12-035-92

SIERRA CLUB EXHIBIT 40

Selected Responses to DPU Data Requests in Docket No. 12-035-92

DPU Data Request 17.3

Is it Ms. Crane's contention that Bridger coal is only suitable for use at the Bridger plant? If not, please explain.

Response to DPU Data Request 17.3

As discussed with DPU personnel in conference, the boiler units at the Jim Bridger Plant were constructed to consume the coal quality specifications of the coal produced from the coal supplies in close proximity to the plant, namely Bridger Coal Mine and Black Butte Coal Mine. The quality of this coal is substantially different from other coal supplies in the western U.S. such as the Powder River Basin, the Uinta Basins of Colorado and Utah. Please see Attachment DPU 17.3 for a comparison of western mine coal quality specifications.

As is evident from the attachment, coal is not a homogenous product and the marketability of coal is subject to these quality considerations. Each potential customer, whether another coal plant or other industrial user, would need to evaluate the coal quality specifications and determine if a particular coal is suitable for consumption in its operation. Oftentimes, this review is culminated by an actual test burn of the coal.

The costs of coal production coupled with transportation costs to move the product, as compared to other coal alternatives, also factor into the marketability of the coal. The Company has provided its assessment of the coal market in south west Wyoming in previous data requests.

DPU Data Request 17.5

Please provide a revised base case PVRR(d), as described in lines 20-22 on page 1 and lines 23-24 on page 2 of Mr. Link's rebuttal testimony, that is based on the assumption that any excess Bridger coal arising from the conversion of two Bridger units to natural gas, is sold to a third party at cost.

Response to DPU Data Request 17.5

The Company has not performed the requested study.