



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE LEGAL OPERATIONS AGENCY

May 21, 2014

USAF Utility Law Field Support Center
139 Barnes Drive
Tyndall AFB FL 32403

Gary Widerburg, Commission Secretary
Utah Public Service Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111

Re: Docket No. 13-035-184


Attention: Gary Widerburg, Commission Secretary,

Re: Federal Executive Agencies responses to Rocky Mountain Power's first discover response

Enclosed please find an original and 12 copies of Greg R. Meyer's responses to Rocky Mountain Power's first discover response on behalf of the Federal Executive Agencies. Mr. Greg R. Meyer, is a consultant at Brubaker and Associates, and represents the FEA. I have also sent a copy of this document electronically to pse@utah.gov.

Thank you for your assistance with this matter. If you have questions regarding these documents, please contact me at 850-283-6663 or by email at Thomas.Jernigan@US.AF.MIL.

Sincerely



THOMAS A. JERNIGAN, Capt, USAF
Counsel For Federal Executive Agencies

CERTIFICATE OF SERVICE

I hereby certify that on this 21th day of May, 2014, a true copy of the foregoing document was sent via email to the following:

Chris Parker
William Powell
Dennis Miller
Division of Public Utilities
Heber Wells Building, 4th Floor
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
wpowell@utah.gov
dennismiller@utah.gov
chrisparker@utah.gov

Mark C. Moench
David L. Taylor
Yvonne R. Hogle
Barry Bell
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
mark.moench@pacificorp.com
dave.taylor@pacificorp.com
yvonne.hogle@pacificorp.com
barry.bell@pacificorp.com

Patricia Schmid
Justin Jetter
Assistant Attorneys General
Heber Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov
jjetter@utah.gov

William J. Evans
Vicki M. Baldwin
Parsons Behle & Latimer
One Utah Center
201 South Main Street, Suite 1800
Post Office Box 45898
Salt Lake City, UT 84145-0898
BEvans@parsonsbehle.com
VBaldwin@parsonsbehle.com

Michele Beck
Cheryl Murray
Dan Gimble
Bela Vastag
Committee of Consumer Services
Heber Wells Building, 4th Floor
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov
cmurray@utah.gov
dgimble@utah.gov
bvastag@utah.gov

Brent Coleman
Assistant Attorney General
Utah Office of Consumer Services
160 East 300 South, Fifth Floor
P.O. Box 140857
Salt Lake City, Utah 84114-0857
brentcoleman@utah.gov

Robert Millsap
Renewable Energy Advisors
PO Box 900036
Sandy, UT 84090
bobmillsap@renewable-energy-advisors.com

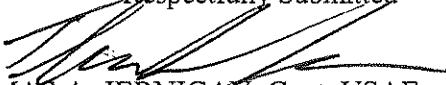
Gary Dodge
Hatch James & Dodge
10 West Broadway, Suite 400
Salt Lake City, UT 84101
gdodge@hjdllaw.com

Jeremy R. Cook
Parsons Kinghorn Harris, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
jrc@pkhlawyers.com

Peter J. Mattheis
Eric J. Lacey
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007
pjm@bbrslaw.com
elacey@bbrslaw.com

Derek Nelson
Sierra Club
85 Second Street, Second floor
San Francisco, CA 94105
(415) 977-5595 Voice
(415) 977-5739 Facsimile
derek.nelson@sierraclub.org

Respectfully Submitted



THOMAS A. JERNIGAN, Capt, USAF
Utility Law Field Support Center
139 Barnes Ave., Suite 1
Tyndall AFB, FL 32403
(850)283-6663
Thomas.Jernigan@US.AF.MIL

**Rocky Mountain Power
Docket No. 13-035-184**

**Federal Executive Agencies' Responses to Rocky Mountain Power's
First Set of Discovery Requests in the Revenue Requirement Phase of the Case**

Data Request No. 1.1:

Please provide the specific sources used for the data in table 1 on page 4 of Mr. Meyer's direct testimony.

Response:

Mr. Meyer's source for the data used in table 1 is Rocky Mountain's Utah Supplement to the FERC Form 1 – page 2.

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Data Request No. 1.2:

Please provide the specific sources used for the data in table 2 on page 5 of Mr. Meyer's direct testimony.

Response:

The sources for the data in Mr. Meyer's table 2 is listed below.

Docket No. 07-035-93	Exhibit RMP_(WRG-6)
Docket No. 08-035-38	William Griffith – Exhibit E
Docket No. 19-035-23	Exhibit RMP_(WRG-5)
Docket No. 10-035-124	Exhibit RMP_(WRG-5)
Docket No. 11-035-200	Exhibit RMP_(WRG-3)
Docket No. 13-035-184	Exhibit RMP_(JRS-5)

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Data Request No. 1.3:

With regards to Mr. Meyer's testimony on lines 87 – 89, please provide the following:

- a. Base temperature used in the definition of heating degree day in Mr. Meyer's testimony.
- b. The monthly data and source used to support the 4,664 heating degree days quoted by Mr. Meyer.
- c. The data and source of the information to support the claim that 'This low total of heating degree days has not been experienced dating back to 1948.'

Response:

- a. 65° F.
- b. Weather data from the Salt Lake City Airport weather station.
- c. Weather data from the Salt Lake City Airport weather station.

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Data Request No. 1.4:

Work papers to support the calculation of:

- a. \$22 million revenue increase on line 108 of Mr. Meyer's testimony.
- b. The 39% power expense on line 111 of Mr. Meyer's testimony.
- c. The impact on increased residential revenue on peak energy and Allocation factors.

Response:

Attached are the workpapers of Mr. Meyer pertaining to questions "a." and "b." Mr. Meyer has not prepared a workpaper in response to question 'c.'