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**RE: OCS's First Set of Data Requests to Joint Parties (1.1-1.3) in Docket No. 14-035-114**

Enclosed are Joint Parties' responses to the Office's first set of data requests in Docket No. 14-035-114, including questions 1.1 through 1.3. If you have any questions, please call Sophie Hayes at 801-903-2034 (desk) or 801-835-4907 (cell).

Sincerely,

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/s/  
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Enclosures

1.1 Please refer to line 623 of Mr. Woolf’s rebuttal testimony in which he states: My cost impact and rate impact analyses are essentially the same analysis. They use the same methodologies, input assumptions, and time period. The only difference between the two is the way results reported [sic].”

Also refer to line 657, which states,

In the cost impact analysis, the lost revenues are not included, because they do not affect revenue requirements. In the rate impact analysis, lost revenues are included, because that is how lost revenues affect ratepayers—by increasing rates.

If the only difference between the two analyses are the results reported, how could lost revenue dollars have been included in the rate analysis but not in the cost analysis?

### Joint Parties Response

With regard to the statement on line 657, this statement is correct and clear.

With regard to the statement on line 623, this statement is correct, but is not entirely clear. A more clear statement would be as follows:

The only difference between the two is the way results are reported: the cost impact analysis reports only costs and benefits in terms of PVRR (which are not affected by lost revenues), while the rate impact analysis reports impacts on rates (which are affected by lost revenues).

With this clarification, the two statements are consistent.