

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME FOR THE RECORD.**

2 **A.** Mary H. Cleveland

3 **Q. ARE YOU THE SAME MARY H. CLEVELAND WHO PREVIOUSLY SUBMITTED**
4 **DIRECT TESTIMONY IN THIS PROCEEDING?**

5 **A.** Yes.

6 **II. PURPOSE OF TESTIMONY**

7 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

8 **A.** My rebuttal testimony proposes an additional condition which the Division, based on
9 our review of the direct testimonies of the other parties to this docket, believes is necessary
10 to further mitigate the issues and concerns identified in my direct testimony, Exhibit No.
11 DPU 2.0.

12 **III. ADDITIONAL CONDITION**

13 **Q. WHAT IS THE ADDITIONAL CONDITION YOU ARE PROPOSING?**

14 **A.** As I stated in my direct testimony, corporate structure will impact the extent as well

1 as the complexity of affiliated transactions. Additionally, any future acquisitions made by
2 ScottishPower are likely to impact corporate costs. Therefore, ScottishPower should be
3 required to notify the Utah Commission when it enters into a new merger, acquires an
4 additional entity, or makes a major change in its corporate structure. This is similar to the
5 following condition imposed on the PacifiCorp / Utah Power merger which should continue
6 to apply to PacifiCorp:

7 PacifiCorp shall not enter into a new merger, change its corporate
8 structure to form a holding company, or make any other major change
9 in corporate structure without prior notice to this Commission.

10 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

11 **A.** Yes.