Exhibit CCS 4.4

08-035-38/Rocky Mountain Power
November 24, 2008
CCS Data Request 21.14

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NPC: Does the Company agree or disagree that in its methodology used for computing additional start up costs and start up fuel costs that the Company does not consider the value of power produced during the start up sequence of the Currant Creek, Lake Side and Chehalis plants? Please provide an explanation of the answer.

Response to CCS Data Request 21.14

The energy produced during start up has much less value than energy produced during steady state operations. The plants must follow a prescribed startup procedure and time line. This time line does not match the Company's requirements, e.g., the startup does not match an increase in loads. Therefore, another plant that is already online must be backed off temporarily while the plant is ramping up to full load. Often times the online plant being backed off has a lower cost (e.g., coal) the plant being ramped up (gas) resulting in a temporary net increase in net power costs. As such the power has limited value and is not included in the start up cost calculation.