

Rocky Mountain Power
 Utah General Rate Case
 Coal Inventory Adjustment

Docket No. 09-035-23
 DPU Exhibit 3.3.1 CONFIDENTIAL
 Michael J. McGarry, Sr.
 October 8, 2009

	<u>ACCOUNT</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>UTAH ALLOCATED</u>
Fuel Stock	151SE	[REDACTED]	SE	41.001%	[REDACTED]

Company has over stated its coal inventory for Carbon, Hunter and Huntington. The combined inventory at these plants is approximately 185 days. The Company's strategy per its response to DPU 26.4 is to maintain **[begin confidential] [end confidential] days of inventory.** Division adjustment allows Company to include in rate base an amount equal to the mid-point of that stated inventory level.

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<u>Line #</u>	<u>Description</u>	<u>Company Position</u>	<u>Adjustment</u>	<u>Division Position</u>
1	<u>Fuel Stock</u>	\$ 160,345,600		

See DPU Exhibit 3.6.3 for derivation of adjustment

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Line #	Description	Test Year 13 month average Inventory Balance (dollars)	Test Year 13 month average Inventory Balance (tons)	2008 Fuel Burned (tons)	2008 Average Tons Burned per day	Days Burn Inventory
	(A)	(B)	(C)	(D)	(E)=(D) ÷ 365	(F)=(C) ÷ (E)
1	Carbon	\$ 1,496,791	44,061	640,585	1,755	25.1
2	Hunter	\$ 58,043,789	2,033,538	3,779,332	10,354	196.4
3	Huntington	\$ 21,494,075	811,214	3,221,777	8,827	91.9
4	Prep Plant	\$ 24,859,104	973,068	-	-	-
5	Total Utah Plants	\$ 105,893,759	3,861,881	7,641,694	20,936	184.5
Adjustment Calculation						
6	Mid-point of RMP Inventory Strategy (per Data Response 26.4)				Confidential	██████████
7	Excessive Inventory - days (Line 6 minus Line 5)				Confidential	██████████
8	Excessive Inventory - percent (Line 7 ÷ Line 5)				Confidential	██████████
9	Test Year Inventory Balance				Col (B) Line 5	\$ 105,893,759
10	Division Adjustment - Account 151SE (Line 9 x Line 8)				Confidential	██████████

Notes: Col (B) - Response to DPU 26.1 (13 mth average calculated based on monthly balances (June 2009 through June 2010))
Col (C) - Response to DPU 26.1
Col (D) - FERC Form 1

Line #	Plant	Test Year	2008	2008	Days Burn Inventory
		13 month average Inventory Balance (tons)	Fuel Burned (tons)	Average Tons Burned per day	
	(A)	(B)	(C)	(D)=(C) ÷ 365	(F)=(B) ÷ (D)
1	Bridger	638,486	5,709,196	15,641.63	41
2	Carbon	44,061	640,585	1,755.03	25
3	Cholla	323,876	1,591,193	4,359.43	74
4	Colstrip	49,664	708,786	1,941.88	26
5	Craig	143,804	667,842	1,829.70	79
6	Hayden	47,796	314,700	862.19	55
7	Hunter	2,033,538	3,779,332	10,354.33	196
8	Huntington	811,214	3,221,777	8,826.79	92
9	Johnston	441,434	3,942,421	10,801.15	41
10	Naughton	419,424	2,772,108	7,594.82	55
11	Wyodak				
12	Total Plants	<u>4,953,297</u>	<u>23,347,940</u>	<u>63,966.96</u>	<u>77</u>
13	Mines/Prep Plant				
14	Deer Creek	11,566	NA	NA	NA
15	Prep Plant	973,068	NA	NA	NA
16	Rock Garden	95,787	NA	NA	NA
17	Total Inventory	<u>6,033,717</u>	<u>23,347,940</u>	<u>63,966.96</u>	<u>94</u>

Notes: Col (B) - Response to DPU 26.1 (13 mth average calculated based on monthly balances (June 2009 through June 2010)
Col (C) - FERC Form 1