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April 18, 2011

VIA U.S. MAIL AND E-MAIL (DREXCLARK@UTAH.GOV)

David Clark
Utah Public Service Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84114

**Re: Docket No. 10-035-124
UAE Motion to Compel/Status Report**

Dear Mr. Clark:

Pursuant to your interim Order in the above captioned matter, and in accordance with my letter to you dated April 15, 2011, I attach hereto Rocky Mountain Power's privilege log.

As you know, we have, over a weekend, attempted to do a production of over 50,000 pages of documents, segregating those documents into different subsets of confidentiality or privilege. Rocky Mountain Power has attempted to ensure that responsive documents covered by the interim Order have been produced. Given the quick production of such a large number of documents, though, it is possible that some document or documents were inadvertently produced or omitted. We will attempt to review the production this week to confirm whether any errors or omissions were made.

Additionally, there are one or two documents identified on the privilege log that Rocky Mountain Power may be willing to produce to UAE for use in these proceedings after it receives assurances, as contemplated by Federal Rule of Civil Procedure 502(d), that the disclosure of such documents will not result in a waiver of Rocky Mountain Power's privilege in this or any other federal or state proceeding. Rocky Mountain Power hopes to be able to obtain such protection by stipulation, responsive letters hereto, or by order of this Commission.



David Clark
April 18, 2011
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Please let me know if there are other questions regarding this document production. Thank you again for your assistance.

Sincerely,

D. Matthew Moscon

Attachment

cc: Yvonne Hogle, Esq. (via e-mail)
Philip D. Dracht, Esq. (via e-mail)
Gary A. Dodge, Esq. (via e-mail)
Paul H. Proctor, Esq. (via e-mail)

**DESERET V. PACIFICORP – SCRUBBER/BAGHOUSE ARBITRATION
PRIVILEGE LOG**

Doc. Number	Doc. Date	Title/Summary	Author	Recipients	Carbon Copies	Privilege
PACARB1 000014665 - PACARB1 000014670	4/21/05	Legal report to PacificCorp Board re strategic options to address air quality uncertainties.	Mike Jenkins, Esq.; Bill Edmonds; Ernie Wessman;	PacificCorp Board		Attorney Client ("AC")
PACARB1 000030243 -- PACARB1 000030415	10/02	Multi Pollutant Control Report commissioned by PacificCorp legal counsel to assist in providing PacificCorp with legal advice re potential future litigation.	Sargent & Lundy, LLC	PacificCorp; General Counsel for PacificCorp		AC/Work Product ("WP")
PACARB1 000031247	Undated	Draft re Environmental commitments prepared at direction of legal counsel.	PacificCorp employee/agent	PacificCorp		WP
PACARB1 000031248- PACARB1 000031250	8/21/03	Graph re Projected Majority Owned Coal-Fired Generation and Emissions with Committed Reductions prepared at direction of legal counsel to assist with legal advice.	PacificCorp employee/agent	PacificCorp		WP
PACARB1 000031251	7/7/05	Email re legal advice concerning revision of Emission reductions document .	Cathy Woollums, Esq.	Chuck Montgomery	Barb Coughlin; Brent Gale	AC/WP
PACARB1 000031252	Undated	Graph re Pollution Control Equipment Commitment and Proposed Inservice Dates prepared at direction of legal counsel to assist with legal advice.	PacificCorp employee/agent	PacificCorp		WP

**DESERET V. PACIFICORP – SCRUBBER/BAGHOUSE ARBITRATION
PRIVILEGE LOG**

PACARB1 000031253 – PACARB1 000031257	9/2/05	Draft Data Response re Proposed Response to CUB Data Request 6.b prepared at direction of legal counsel.	PacificCorp employee/agent	PacificCorp		WP
PACARB1 000031261	10/3/06	Email re legal advice re PacificCorp Projects and MEHC's Emissions Reduction Plan.	Cathy Woollums, Esq.	Timothy Grabinski	Bill Lawson; Steven Guyer	AC
PACARB1 000031262 – PACARB1 000031263	10/24/06	Report re MidAmerican Energy Holdings Company/PacificCorp Environmental Commitments prepared at direction of legal counsel to assist with legal advice.	Cathy Woollums	PacificCorp		AC/WP
PACARB1 000031264	Undated	Graph re MidAmerican Pollution Control Equipment Commitments prepared at direction of legal counsel to assist with legal advice.	PacificCorp employee/agent	PacificCorp		AC