

Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513-421-2255 Fax: 513-421-2764
E-mail: kboehm@BKLawfirm.com

Brian W. Burnett, Esq.
CALLISTER NEBEKER & MCCULLOUGH
Zions Bank Building
10 East South Temple, Suite 900
Salt Lake City, Utah 84133
Telephone 801-530-7300 Fax: 801-364-9127
E-mail: brianburnett@cnmlaw.com

COUNSEL FOR THE KROGER CO.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Rocky Mountain Power :
for Authority to Increase its Retail Electric Utility Service : Docket No. 10-034-24
Rates in Utah and for Approval of Its Proposed Electric :
Service Schedules and Electric Service Regulations :

**FIRST SET OF DATA REQUEST OF THE KROGER CO.
TO ROCKY MOUNTAIN POWER**

Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513-421-2255 Fax: 513-421-2764
E-mail: kboehm@bkllawfirm.com

COUNSEL FOR THE KROGER CO

April 11, 2011

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. Rocky Mountain Power and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to The Kroger Co. studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement, and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**FIRST SET OF DATA REQUESTS OF THE KROGER CO.
TO ROCKY MOUNTAIN POWER
Docket No. 10-034-24**

- Q1-1. Please provide an electronic copy of the Class Cost of Service model, all formulas intact, with inputs consistent with embedded cost study presented in the exhibits of C. Craig Paice.
- Q1-2. Please provide all workpapers supporting the development of the functionalized Class Cost of Service Study, including the development of all allocators and loss factors. If a portion or all of these workpapers exist as electronic spreadsheets, please provide the electronic version with all formulas intact.
- Q1-3. Please provide all workpapers showing the process of developing the test year class loads from load research data, as described in the Direct Testimony of Scott D. Thornton. If a portion or all of these workpapers exist as electronic spreadsheets, please provide the electronic version with all formulas intact.
- Q1-4. For Rate Schedules 6, 6A, 6B, 8 and 9, please provide a narrative description of the load research program which produces the data used develop the class loads. This description should include how the number of load research meters is determined, how the class is subdivided for load research purposes, and a schedule showing the total number of customers and number of load research meters for each sub-group.
- Q1-5. For Rate Schedules 6, 6A, 6B, 8 and 9, provide the actual hourly load research data by meter number used to develop the class loads, disaggregated by sub-group or strata, and the strata weights used to aggregate the data.
- Q1-6. For each of the Rate Schedules 6, 6A, 6B, 8 and 9 Adjusted Actual billing units shown on Exhibit RMP ____ (WRG-5), please provide the billing units separately for customers grouped by maximum annual billing demand, in increments of 50 kW. In other words, provide the aggregate billing units for all customers whose maximum billing demand is less than or equal to 50 kW, for those whose maximum billing demand is greater than 50 kW but less than or equal to 100 kW, and so forth.
- Q1-7. Please provide all workpapers supporting the development of the proposed Rate Schedules 6, 6A, 6B, 8 and 9. If a portion or all of these workpapers exist as electronic spreadsheets, please provide the electronic version with all formulas intact.
- Q1-8. Please provide all workpapers supporting the development of the "Forecasted Units 6/30/09" for proposed Rate Schedules 6, 6A, 6B, 8 and 9 as shown on Exhibit RMP ____ (WRG-5). If a portion or all of these workpapers exist as electronic spreadsheets, please provide the electronic version with all formulas intact.
- Q1-9. Please provide a narrative explanation of procedures used by the Company to verify consistency between the billing determinants used in developing test year revenues and the demands used in allocating costs in the Class Cost of Service Study.

Please provide your responses to our consultant at the address listed below.

Stephen J. Baron
J. Kennedy & Associates
570 Colonial Park Drive, Suite 305
Roswell, GA 30075
sbaron@jkenn.com

DATED this 11th day of April, 2011.

Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513-421-2255 Fax: 513-421-2764
e-mail: kboehm@BKLawfirm.com