

# Exhibit D



**ROCKY MOUNTAIN  
POWER**  
A DIVISION OF PACIFICORP

201 South Main, Suite 2300  
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April 27, 2011

***VIA EMAIL AND OVERNIGHT DELIVERY***

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RE: UT Docket No. 10-035-124  
UIEC 19<sup>th</sup> Set Data Request (1-13)

Please find enclosed Rocky Mountain Power's Responses to UIEC Data Requests 19.1-19.13. Provided on the enclosed Confidential CD are Confidential Attachments UIEC 19.10 and 19.13. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding. If you have any questions, please call Barry Bell at (801) 220-4985.

Sincerely,

Dave Taylor  
Manager, Regulation

Enclosure

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10-035-124/Rocky Mountain Power  
April 27, 2011  
UIEC Data Request 19.1

**UIEC Data Request 19.1**

Does the Company agree to allow UIEC to use discovery responses Mr. Peseau has in his possession from the following dockets: ID PAC-E-10-07; Wyoming PSC No. 20000-384-ER-10? If not, then please provide the Company's responses to each and every request in those dockets for use in this Utah case.

**Response to UIEC Data Request 19.1**

UIEC may use the Company's responses provided to Mr. Peseau in Dockets: ID PAC-E-10-07; and Wyoming PSC No. 20000-384-ER-10, subject to the Company's reservation of all evidentiary objections.

Use of the Company's confidential data provided in the above referenced dockets will be subject to maintaining the confidentiality of such data on the terms and conditions of protective orders and confidentiality agreements in those dockets. Use of confidential responses from other proceedings is also subject to the terms and conditions of the protective order in this docket.

10-035-124/Rocky Mountain Power  
April 27, 2011  
UIEC Data Request 19.2

**UIEC Data Request 19.2**

Other than PacifiCorp, please provide a detailed monthly summary of the hedging policy and practices and market purchases concerning natural gas for each of every electric utility and natural gas subsidiary and affiliate of Mid-American Energy Holding Company (“MEHC”) for the time period 2006-2010. In this summary, please provide specific risk management policies and practices.

**Response to UIEC Data Request 19.2**

Rocky Mountain Power objects to this request on the grounds that it is irrelevant to the current proceeding and not calculated to lead to the discovery of admissible evidence. MEHC’s business platforms are independently managed and operated businesses. Please refer to the Company’s 1<sup>st</sup> Supplemental response to UIEC Data Request 10.3.

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April 27, 2011  
UIEC Data Request 19.3

**UIEC Data Request 19.3**

For the natural gas swaps purchased by the Company that will mature or expire between June 2011 and June 2012, please provide the date that each contract for each swap position was acquired, the price of each, and the forward price curves the Company relied upon for the period of time during which each was acquired.

**Response to UIEC Data Request 19.3**

The Company considers the information requested to be commercially sensitive and highly confidential. Please contact Dave Taylor at 801-220-2923 to discuss arrangements for review.

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UIEC Data Request 19.4

**UIEC Data Request 19.4**

Do any of the persons, boards, committees, or management of MEHC have any approval authority or influence over the natural gas hedging policy of the Company?

**Response to UIEC Data Request 19.4**

No.

10-035-124/Rocky Mountain Power  
April 27, 2011  
UIEC Data Request 19.5

**UIEC Data Request 19.5**

Is the natural gas hedging policy of the Company presented to any of the persons, board, committees, or management of MEHC?

**Response to UIEC Data Request 19.5**

No.

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April 27, 2011  
UIEC Data Request 19.6

**UIEC Data Request 19.6**

Please provide the names of the officers and directors of PacifiCorp.

**Response to UIEC Data Request 19.6**

The information is publicly available in the PacifiCorp Form 10-K and PacifiCorp's FERC Form 1.



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April 27, 2011  
UIEC Data Request 19.7

**UIEC Data Request 19.7**

Please provide the names of the officers and directors of MEHC.

**Response to UIEC Data Request 19.7**

The information is publicly available in the MEHC Form 10-K.

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April 27, 2011  
UIEC Data Request 19.8

**UIEC Data Request 19.8**

Please explain in detail any and all contacts that any personnel of PacifiCorp had with any personnel of Mitchell Energy since 2000. Provide copies of any correspondence and contracts.

**Response to UIEC Data Request 19.8**

PacifiCorp has not transacted with Mitchell Energy.

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UIEC Data Request 19.9

**UIEC Data Request 19.9**

Please explain in detail any and all contacts that any personnel of any MEHC subsidiary or affiliate had with any personnel of Mitchell Energy since 2000. Provide copies of any correspondence and contracts.

**Response to UIEC Data Request 19.9**

Rocky Mountain Power objects to this request on the grounds that it is irrelevant to the current proceeding and not calculated to lead to the discovery of admissible evidence. MEHC's business platforms are independently managed and operated businesses. Please refer to the Company's 1<sup>st</sup> Supplemental response to UIEC Data Request 10.3.

10-035-124/Rocky Mountain Power  
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UIEC Data Request 19.10

**UIEC Data Request 19.10**

Please explain in detail any and all contacts that any personnel of PacifiCorp had with any personnel of Devon Energy Corp. since 2000. Provide copies of any correspondence and contracts.

**Response to UIEC Data Request 19.10**

PacifiCorp has transacted with Devon Energy Corp. Please refer to Confidential Attachment UIEC 19.10 for a copy of the contract. Confidential information is provided subject to Commission Rule 746-100-16.

10-035-124/Rocky Mountain Power  
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UIEC Data Request 19.11

**UIEC Data Request 19.11**

Please explain in detail any and all contacts that any personnel of any MEHC subsidiary or affiliate had with any personnel of Devon Energy Corp. since 2000. Provide copies of any correspondence and contracts.

**Response to UIEC Data Request 19.11**

Rocky Mountain Power objects to this request on the grounds that it is irrelevant to the current proceeding and not calculated to lead to the discovery of admissible evidence. MEHC's business platforms are independently managed and operated businesses. Please refer to the Company's 1<sup>st</sup> Supplemental response to UIEC Data Request 10.3.

10-035-124/Rocky Mountain Power  
April 27, 2011  
UIEC Data Request 19.12

**UIEC Data Request 19.12**

Please explain in detail any and all contacts that any personnel of any MEHC subsidiary or affiliate had with any personnel of Shell Energy since 2002. Provide copies of any correspondence and contracts.

**Response to UIEC Data Request 19.12**

Rocky Mountain Power objects to this request on the grounds that it is irrelevant to the current proceeding and not calculated to lead to the discovery of admissible evidence. MEHC's business platforms are independently managed and operated businesses. Please refer to the Company's 1<sup>st</sup> Supplemental response to UIEC Data Request 10.3.

10-035-124/Rocky Mountain Power  
April 27, 2011  
UIEC Data Request 19.13

**UIEC Data Request 19.13**

Please explain in detail any and all contacts that any personnel of PacifiCorp had with any personnel of Shell Energy since 2002. Provide copies of any correspondence and contracts.

**Response to UIEC Data Request 19.13**

PacifiCorp has routinely transacted with Shell Energy since 2002. Supplying copies of all correspondence would be unduly burdensome. Please refer to Confidential Attachment UIEC 19.13. Confidential information is provided subject to Rule 746-100-16 of the Commission Rules.