

# **Exhibit E**



**ROCKY MOUNTAIN  
POWER**  
A DIVISION OF PACIFICORP

201 South Main, Suite 2300  
Salt Lake City, Utah 84111

May 3, 2011

***VIA EMAIL AND OVERNIGHT DELIVERY***

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RE: UT Docket No. 10-035-124  
UIEC 20<sup>th</sup> Set Data Request (1-32)

Please find enclosed Rocky Mountain Power's Responses to UIEC Data Requests 20.1 – 20.32. Provided on the enclosed non-confidential CD are Attachments UIEC 20.7, 20.8, and 30.32. Provided on the enclosed Confidential CD is Confidential Attachment UIEC 20.1. 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 / hsw*  
Dave Taylor  
Manager, Regulation

Enclosure

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10-035-124/Rocky Mountain Power  
May3, 2011  
UIEC Data Request 20.1

**UIEC Data Request 20.1**

For the natural gas swaps acquired by the Company for which recovery is sought in this case, please provide the date that each contract for each swap position was acquired, the price for each, from whom each was acquired, and a copy of each contract.

**Response to UIEC Data Request 20.1**

Please refer to Filing Requirement R746-700-23.C.8-1 Confidential, "UTGRCw\_Gas Swaps (Confidential) – Ext 577 (110810 FPC), tab "Source Data" for the information requested. The spot or index price for a transaction is not known at the time the transaction is executed. It is only known when the transaction has fully settled.

Please refer to Confidential Attachment UIEC 20.1 for copies of contracts. Confidential information is provided subject to Rule 746-100-16 of the Commission Rules.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.2

**UIEC Data Request 20.2**

With respect to the prior request, please provide the forward natural gas pricing curves relied upon by the Company to make each swap acquisition decision.

**Response to UIEC Data Request 20.2**

Please refer to the Company's response to UIEC Data Request 19.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.3

**UIEC Data Request 20.3**

Please describe and provide copies of all contracts between PacifiCorp, or any of its affiliates, including MidAmerican Energy, with Mitchell Energy during the past ten years.

**Response to UIEC Data Request 20.3**

To the extent this request seeks information on contracts between PacifiCorp's affiliates and Mitchell Energy, 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 supplemental response to UIEC 10.3.

PacifiCorp has not entered into contracts with Mitchell Energy during the past ten years. Please refer to response to UIEC 19.8.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.4

**UIEC Data Request 20.4**

Please describe and provide copies of all contracts between PacifiCorp, or any of its affiliates, including MidAmerican Energy, with Devin Energy Corp. for the last ten years.

**Response to UIEC Data Request 20.4**

To the extent this request seeks information on contracts between PacifiCorp's affiliates and Devon Energy, 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 supplemental response to UIEC 10.3.

PacifiCorp has transacted with Devon Energy during the past ten years. Please see response to UIEC 19.10.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.5

**UIEC Data Request 20.5**

Please describe and provide copies of all contracts between MidAmerican Energy, or its affiliates, with representatives of the shale gas industry from 2002 through June 2011.

**Response to UIEC Data Request 20.5**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.6

### **UIEC Data Request 20.6**

Please describe any contacts between PacifiCorp or any of its affiliates, including MidAmerican Energy, with representatives of the shale gas industry from 2002 through June 2011.

### **Response to UIEC Data Request 20.6**

To the extent this request seeks information on contacts between PacifiCorp's affiliates and representatives of the shale gas industry, 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 supplemental response to UIEC Data Request 10.3.

PacifiCorp Energy was contacted in 2010 by Encana, a natural gas producing company with shale-based production operations, to determine PacifiCorp's interest in procuring natural gas from shale-based production operations. Interest was limited because Encana was proposing production operations in Texas, Louisiana, and far northern British Columbia. Because none of these locations are readily accessible by PacifiCorp generation, discussions did not progress.

Rocky Mountain Power was contacted by a shale oil producer from Uintah County, Utah in November, 2010 inquiring if Rocky Mountain Power could provide power to their shale oil development. Several conversations were held with the customer to describe the power system in the area and to determine the customer's power requirements. This customer filed a formal service request in January, 2011 and signed an Engineering Services Agreement in February, 2011 requesting service to their operations.

Preliminary results from the study indicate since the customer's operations is remote from any existing power lines and several miles of transmission lines as well as substation improvements would need to be constructed to provide service. Rocky Mountain Power is currently working closely with the customer and county officials to pursue options to construct these facilities. No timeline has been set for when or if these facilities will be built.

Other companies have been identified in the Uintah Basin that appear to be working on shale oil opportunities. Rocky Mountain Power has had no contact with any of these companies to date but recognizes that in the future they may request service for their operations as well.



10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.7

**UIEC Data Request 20.7**

What are the names of the officers and directors of MidAmerican Energy and each of its affiliates?

**Response to UIEC Data Request 20.7**

Please refer to the schedule provided as Attachment UIEC 20.7 for the list of officers and directors/managers of MidAmerican Energy and its two wholly owned subsidiaries (CBEC Railway Inc. and Century Development, LLC) and its immediate (MHC Inc.) and intermediate parent (MidAmerican Funding, LLC) entities.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.8

**UIEC Data Request 20.8**

Does MidAmerican Energy Holding Company (“MEHC”) have any affiliations, subsidiaries or sister companies in the natural gas business? Please identify each entity and its officers and directors.

**Response to UIEC Data Request 20.8**

Please refer to supplemental response to UIEC 10.2 for the entities. Officers and directors for MEHC, PacifiCorp, and MEC are listed in the publicly available Form 10-K for each entity. NNG and Kern River do not file a Form 10-K. Please refer to Attachment UIEC 20.8 for directors and officers of NNG and executive committee and officers of Kern River.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.9

**UIEC Data Request 20.9**

Please provide a copy of the risk management policy for CalEnergy.

**Response to UIEC Data Request 20.9**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.10

**UIEC Data Request 20.10**

Please describe CalEnergy's policy for the acquisition of natural gas.

**Response to UIEC Data Request 20.10**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.11

**UIEC Data Request 20.11**

Does CalEnergy hedge its natural gas? If so, describe the strategy and process it uses to hedge its natural gas.

**Response to UIEC Data Request 20.11**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.12

**UIEC Data Request 20.12**

Does CalEnergy use a fixed-per-swap strategy to hedge its natural gas? If so, please explain how the strategy and policy work.

**Response to UIEC Data Request 20.12**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.13

**UIEC Data Request 20.13**

Please explain what CalEnergy uses to determine the amount of natural gas swaps to acquire, the time period for which to acquire, and the price at which to acquire.

**Response to UIEC Data Request 20.13**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.14

**UIEC Data Request 20.14**

If forward price curves are used by CalEnergy to make any natural gas swap acquisition decisions, are they the same forward price curves as used by PacifiCorp? If not, explain why not.

**Response to UIEC Data Request 20.14**

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 supplemental response to UIEC 10.3.



10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.15

**UIEC Data Request 20.15**

What percent of the CalEnergy load in any given year is subject to a fixed-for-variable swap if such swaps are used?

**Response to UIEC Data Request 20.15**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.16

**UIEC Data Request 20.16**

Please provide a copy of the risk management policy for MidAmerican Energy.

**Response to UIEC Data Request 20.16**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.17

**UIEC Data Request 20.17**

Please describe MidAmerican Energy's policy for the acquisition of natural gas.

**Response to UIEC Data Request 20.17**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.18

**UIEC Data Request 20.18**

Does MidAmerican Energy hedge its natural gas? If so, describe the strategy and process it uses to hedge its natural gas.

**Response to UIEC Data Request 20.18**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.19

**UIEC Data Request 20.19**

Does MidAmerican Energy use a fixed-per-swap strategy to hedge its natural gas?  
If so, please explain how the strategy and policy work.

**Response to UIEC Data Request 20.19**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.20

**UIEC Data Request 20.20**

Please explain what MidAmerican Energy uses to determine the amount of natural gas swaps to acquire, the time period for which to acquire, and the price at which to acquire.

**Response to UIEC Data Request 20.20**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.21

**UIEC Data Request 20.21**

If forward price curves are used by MidAmerican Energy to make any natural gas swap acquisition decisions, are they the same forward price curves as used by PacifiCorp? If not, explain why not.

**Response to UIEC Data Request 20.21**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.22

**UIEC Data Request 20.22**

What percent of the MidAmerican Energy load in any given year is subject to a fixed-for-variable swap if such swaps are used?

**Response to UIEC Data Request 20.22**

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 supplemental response to UIEC 10.3.



10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.23

**UIEC Data Request 20.23**

Does MidAmerican Energy hedge natural gas for its natural gas supply facilities?  
If so, please explain how the strategy and process it uses.

**Response to UIEC Data Request 20.23**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.24

**UIEC Data Request 20.24**

Does MidAmerican Energy use a fixed-per-swap strategy to hedge natural gas for its natural gas supply facilities? If so, please explain how the strategy and policy work.

**Response to UIEC Data Request 20.24**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.25

**UIEC Data Request 20.25**

For its natural gas supply facilities, please explain what MidAmerican Energy uses to determine the amount of natural gas swaps to acquire, the time period for which to acquire, and the price at which to acquire.

**Response to UIEC Data Request 20.25**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.26

**UIEC Data Request 20.26**

If forward price curves are used by MidAmerican Energy for its natural gas supply facilities to make any natural gas swap acquisition decisions, are they the same forward price curves as used by PacifiCorp? If not, explain why not.

**Response to UIEC Data Request 20.26**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.27

**UIEC Data Request 20.27**

For its natural gas supply facilities, what percent of the MidAmerican Energy load in any given year is subject to a fixed-for-variable swap if such swaps are used?

**Response to UIEC Data Request 20.27**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.28

**UIEC Data Request 20.28**

Does MEHC hedge any of its commodities? If so, which commodities?

**Response to UIEC Data Request 20.28**

MEHC is a holding company and does not own any gas-fueled generation or non-generation facilities directly.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.29

**UIEC Data Request 20.29**

Does MEHC hedge its natural gas commodity risk in any way? If so, please explain the hedging strategy and policy that MEHC employs to mitigate the natural gas price risks that it or its natural gas consuming entities, such as PacifiCorp, MidAmerican Energy, or CalEnergy, face.

**Response to UIEC Data Request 20.29**

To the extent this request seeks information on the hedging strategies and policies of MEHC affiliates, 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 supplemental response to UIEC 10.3. MEHC itself is a holding company and does not own gas-fueled generation or non-generation facilities directly.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.30

**UIEC Data Request 20.30**

From what basin or basins does Northern Natural Gas transport natural gas? Are any of those basins producing shale gas energy? When did Northern Natural Gas first begin transporting shale gas from the basins?

**Response to UIEC Data Request 20.30**

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 supplemental response to UIEC 10.3.



10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.31

**UIEC Data Request 20.31**

From what basin or basins does Kern River Natural Gas transport natural gas?  
Are any of those basins producing shale gas energy? When did Kern River  
Natural Gas first begin transporting shale gas from the basins?

**Response to UIEC Data Request 20.31**

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 supplemental response to UIEC 10.3.

10-035-124/Rocky Mountain Power  
May 3, 2011  
UIEC Data Request 20.32

**UIEC Data Request 20.32**

Please identify the common officers and directors of PacifiCorp, MidAmerican Energy, MEHC, and CalEnergy.

**Response to UIEC Data Request 20.32**

Please refer to the schedule provided as Attachment UIEC 20.32 for the list of common officers and directors between PacifiCorp and MEHC. There are no common officers or directors between PacifiCorp and MidAmerican Energy. For purposes of this response, "CalEnergy" is defined as "CE Generation, LLC" (the holding company 50% owned by MEHC that owns domestic geothermal and gas-fired generation plants) which does not have any common officers or managers with PacifiCorp.