# Exhibit F

From:

Baldwin, Vicki

Sent:

Friday, April 01, 2011 11:05 AM

To:

'Hogle, Yvonne'

Cc: Subject: Reeder, F. Robert

Attachments:

FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

UIEC 10.1.docx; UIEC 10.2.docx; UIEC 10.3.docx; UIEC 10.4.docx; UIEC 10.5.docx; UIEC 10.6.docx; UIEC 10.7.docx; UIEC 10.8.docx; UIEC 10.9.docx; UIEC 10.10.docx; UIEC

10.11.docx; UIEC 10.12.docx; UIEC 10.13.docx; UIEC 10.14.docx; UIEC 10.15.docx; UIEC

10.16.docx; UIEC 10.17.docx; UT 10-035-124 UIEC Set 10 (1-17) 3-30-11.pdf

## Yvonne,

The Company has objected to most of these requests. We disagree with the Company's position. We believe that a comparison between how other MidAmerican public utilities and companies hedge natural gas and how PacifiCorp hedges natural gas is important in understanding PacifiCorp's policies for hedging and directly relevant in this case.

Please reconsider your position on these objections.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111

email: vbaldwin@parsonsbehle.com

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From: McNay, Kaley [mailto:Kaley.McNay@PacifiCorp.com]

**Sent:** Thursday, March 31, 2011 2:45 PM

To: Reeder, F. Robert; Evans, William; Baldwin, Vicki; cmurray@utah.gov; gdodqe@hjdlaw.com;

khiqqins@energystrat.com; ntownsend@energystrat.com; pjm@bbrslaw.com; ejl@bbrslaw.com; 'Data Request DPU';

bvasatag@utah.gov; dannymartinez@utah.gov; Dan Gimble; jacob.thomas@gdsassociates.com

Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave

**Subject:** UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Attached above is Rocky Mountain Power's Response to UIEC Set 10 (1-17) in Utah docket 10-035-124. Please let me know if you have any trouble opening the attached files.

Thank you,

From:

Hogle, Yvonne [Yvonne.Hogle@PacifiCorp.com]

Sent:

Friday, April 01, 2011 3:25 PM

To: Cc: Baldwin, Vicki Reeder, F. Robert

Subject:

RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Vicki:

On this set, we maintain that these are not relevant to the rate case. We cannot change our position.

Thanks,

Yvonne

**From:** Baldwin, Vicki [mailto:VBaldwin@parsonsbehle.com]

**Sent:** Friday, April 01, 2011 11:05 AM

**To:** Hogle, Yvonne **Cc:** Reeder, F. Robert

Subject: FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

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byasatag@utah.gov; dannymartinez@utah.gov; Dan Gimble; jacob.thomas@gdsassociates.com

Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave

**Subject:** UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Attached above is Rocky Mountain Power's Response to UIEC Set 10 (1-17) in Utah docket 10-035-124. Please let me know if you have any trouble opening the attached files.

Thank you,

From: Monson, Gregory B. [GBMONSON@stoel.com]

**Sent:** Monday, April 04, 2011 12:30 PM

To: Baldwin, Vicki; Moench, Mark; phickey@hickeyevans.com; Taylor, Dave; Reeder, F. Robert

Cc: Hogle, Yvonne; Bell, Barry; katherine@mcd-law.com

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 9 (1-17)

Vicki,

The Company has not asked me to assist on this issue in the rate case except indirectly through Mark's email in this string. As you probably know, Katherine McDowell is handling the net power cost issue in the general rate case. I am copying her on this response.

That said and subject to any input from Katherine or Paul, I understand that the Utah regulatory people are attempting to arrange for someone in Greg Duvall's group to be available this afternoon to discuss the issue with your experts. I don't know if they will be able to make those arrangements, but they are trying to do so.

Please let me know if there is anything else I can do.

Greg

# Gregory B. Monson

STOEL RIVES LLP | 201 S. Main St, Suite 1100 | Salt Lake City, UT 84111-4904

Direct: (801) 578-6946 | Mobile: (801) 599-8146 | Fax: (801) 578-6999

gbmonson@stoel.com | www.stoel.com

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From: Baldwin, Vicki [mailto:VBaldwin@parsonsbehle.com]

**Sent:** Monday, April 04, 2011 11:05 AM

To: Moench, Mark; Monson, Gregory B.; phickey@hickeyevans.com; Taylor, Dave; Reeder, F. Robert

Cc: Hogle, Yvonne; Bell, Barry

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 9 (1-17)

## Greg and/or Paul,

Please let me know the response to our request. As I indicated below, we do not agree with the Company's objection to our request 9.5. . We should be entitled to investigate whether the assumptions the Company is using for ratemaking are the same as those in other aspects of the business.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111

email: vbaldwin@parsonsbehle.com

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From: Moench, Mark [mailto:Mark.Moench@PacifiCorp.com]

Sent: Sunday, April 03, 2011 6:53 PM

To: Monson, Gregory (Stoel); phickey@hickeyevans.com; Taylor, Dave; Baldwin, Vicki; Reeder, F. Robert

Cc: Hogle, Yvonne; Bell, Barry

Subject: FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 9 (1-17)

Importance: High

I am resending this as the prior email had a bad email address for Paul Hickey.

Vickie, going forward this week while Yvonne is out of the office please feel free to communicate directly with Greg Monson or Paul Hickey on this matter. They will work with Dave Taylor to provide an appropriate response.

Mark

**From:** Baldwin, Vicki [mailto:VBaldwin@parsonsbehle.com]

**Sent:** Sunday, April 03, 2011 4:23 PM

To: Moench, Mark

Cc: Hogle, Yvonne; Taylor, Dave; Data Request Response Center; Reeder, F. Robert Subject: FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 9 (1-17)

Mark,

We did not hear back from Yvonne on this matter. I believe she is now out of town. Please let us know if the Company will reconsider its position. Otherwise, we are willing to file a motion to compel.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111

email: vbaldwin@parsonsbehle.com

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From: Baldwin, Vicki

Sent: Friday, April 01, 2011 10:45 AM

To: 'Hogle, Yvonne' Cc: Reeder, F. Robert

Subject: FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 9 (1-17)

Yvonne.

We disagree with the Company's objection to our request 9.5. We believe it is very relevant. We should be entitled to investigate whether the assumptions the Company is using for ratemaking are the same as those in other aspects of the business.

Please reconsider your position.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111 email: vbaldwin@parsonsbehle.com

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From: Baldwin, Vicki

Sent: Thursday, March 31, 2011 5:58 PM

To: 'Taylor, Dave'

Cc: 'datarequest@pacificorp.com'; Reeder, F. Robert

Subject: FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 9 (1-17)

Dave,

We've already arranged to have Mark Widmer and Bob Malko come to the 23d floor to look highly confidential information related to several responses in UIEC set 6. Can we also please have the highly confidential material referenced in these data responses available for inspection at the same time?

Thank you.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111 email: vbaldwin@parsonsbehle.com

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From: McNay, Kaley [mailto:Kaley.McNay@PacifiCorp.com]

**Sent:** Thursday, March 31, 2011 2:47 PM

**To:** Reeder, F. Robert; Evans, William; Baldwin, Vicki; cmurray@utah.gov; gdodge@hjdlaw.com;

khiggins@energystrat.com; ntownsend@energystrat.com; pjm@bbrslaw.com; ejl@bbrslaw.com; 'Data Request DPU';

bvasatag@utah.gov; dannymartinez@utah.gov; Dan Gimble; jacob.thomas@gdsassociates.com

Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave Subject: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 9 (1-17) Attached above is Rocky Mountain Power's Response to UIEC Set 9 (1-17) in Utah docket 10-035-124. Please let me know if you have any trouble opening the attached files.

Thank you,

From:

Baldwin, Vicki

Sent:

Monday, April 04, 2011 12:46 PM

To:

'Hogle, Yvonne'; 'phickey@hickeyevans.com'; Monson, Gregory (Stoel)

Cc:

Reeder, F. Robert; Taylor, Dave; 'datarequest@pacificorp.com'

Subject:

RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

# Greg and/or Paul,

The Company has objected to most of our set 10 requests. We disagree with the Company's position. If the executives or affiliates of PacifiCorp, MEHC, and/or Berkshire Hathaway have any type of interests that could influence the way PacifiCorp makes its hedging decisions, that is extremely relevant to the prudence of RMP's hedging decisions. The questions in our set 10 are reasonably calculated to lead to the discovery of such evidence. Accordingly, please reconsider your objections and provide the requested information.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111

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From: Hogle, Yvonne [mailto:Yvonne.Hogle@PacifiCorp.com]

**Sent:** Friday, April 01, 2011 3:25 PM

**To:** Baldwin, Vicki **Cc:** Reeder, F. Robert

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Vicki:

On this set, we maintain that these are not relevant to the rate case. We cannot change our position.

Thanks,

Yvonne

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Sent: Friday, April 01, 2011 11:05 AM

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Thank you,

From:

Monson, Gregory B. [GBMONSON@stoel.com]

Sent:

Monday, April 04, 2011 3:09 PM

To:

Baldwin, Vicki

Cc:

Mark Moench; yvonne.hogle@pacificorp.com; phickey@hickeyevans.com; katherine@mcd-

law.com

Subject:

RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

# Vicki,

I am catching up on these issues, but note again that Katherine McDowell is the attorney handling net power cost issues in the rate case. She would be your best source for information on responses to data requests dealing with net power costs.

In the meantime and without limiting the foregoing, I understand that the Company has agreed to produce highly confidential portions of its 10-year plan for review by your experts today in response to Data Request 6.46. We believe that should resolve any disagreement on that request. You have also raised disagreement with the Company's response to Data Request 9.5 and to its objection to questions in UIEC's 10th set of Data Requests. I understand that Greg Duvall is not available today and that the Company's attorneys need to consult with him before responding to the disagreement on those requests. We hope to be able to provide a further response to you on them tomorrow. However, I also understand that the Company is attempting to schedule a call with your experts for later this afternoon in an effort to gain some clarity about what UIEC needs.

I hope the foregoing is helpful and that it avoids the necessity of your filing a motion to compel. It appears to me that there is a good likelihood that the discovery issues will be resolved over the next few days.

# Greg

# Gregory B. Monson

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gbmonson@stoel.com | www.stoel.com

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Tuesday, April 05, 2011 5:34 PM

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Cc:

Mark Moench; yvonne.hogle@pacificorp.com; phickey@hickeyevans.com; katherine@mcd-

law.com; Reeder, F. Robert

Subject:

RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Greg, et al.,

Can you please give us an update as to the status of these data requests, especially those of set 10 objected to in their entirety by the Company.

Thank you.

Vicki M. Baldwin
PARSONS BEHLE & LATIMER
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
Telephone: 801-532-1234
Facsimile: 801-536-6111
email: vbaldwin@parsonsbehle.com

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To: Baldwin, Vicki

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Gregory B. Monson

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Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111 email: vbaldwin@parsonsbehle.com

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**Sent:** Friday, April 01, 2011 3:25 PM

**To:** Baldwin, Vicki **Cc:** Reeder, F. Robert

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

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**Sent:** Thursday, March 31, 2011 2:45 PM

To: Reeder, F. Robert; Evans, William; Baldwin, Vicki; cmurray@utah.gov; gdodge@hjdlaw.com;

khiggins@energystrat.com; ntownsend@energystrat.com; pjm@bbrslaw.com; eil@bbrslaw.com; 'Data Request DPU';

bvasatag@utah.gov; dannymartinez@utah.gov; Dan Gimble; jacob.thomas@gdsassociates.com

Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave

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Katherine McDowell [katherine@mcd-law.com]

Sent:

Wednesday, April 06, 2011 2:33 PM

To:

Baldwin, Vicki

Cc:

Mark Moench; yvonne.hogle@pacificorp.com; Monson, Gregory B.;

phickey@hickeyevans.com

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gbmonson@stoel.com | www.stoel.com

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Sent: Monday, April 04, 2011 12:46 PM

**To:** Hogle, Yvonne; phickey@hickeyevans.com; Monson, Gregory B. **Cc:** Reeder, F. Robert; Taylor, Dave; datarequest@pacificorp.com

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

## Greg and/or Paul,

The Company has objected to most of our set 10 requests. We disagree with the Company's position. If the executives or affiliates of PacifiCorp, MEHC, and/or Berkshire Hathaway have any type of interests that could influence the way PacifiCorp makes its hedging decisions, that is extremely relevant to the prudence of RMP's hedging decisions. The

questions in our set 10 are reasonably calculated to lead to the discovery of such evidence. Accordingly, please reconsider your objections and provide the requested information.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111 email: vbaldwin@parsonsbehle.com

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**From:** Hogle, Yvonne [mailto:Yvonne.Hogle@PacifiCorp.com]

Sent: Friday, April 01, 2011 3:25 PM

**To:** Baldwin, Vicki **Cc:** Reeder, F. Robert

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Vicki:

On this set, we maintain that these are not relevant to the rate case. We cannot change our position.

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Yvonne

From: Baldwin, Vicki [mailto:VBaldwin@parsonsbehle.com]

Sent: Friday, April 01, 2011 11:05 AM

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Sent: Thursday, March 31, 2011 2:45 PM

**To:** Reeder, F. Robert; Evans, William; Baldwin, Vicki; cmurray@utah.gov; gdodge@hjdlaw.com; khiggins@energystrat.com; ntownsend@energystrat.com; pjm@bbrslaw.com; ejl@bbrslaw.com; 'Data Request DPU'; bvasatag@utah.gov; dannymartinez@utah.gov; Dan Gimble; jacob.thomas@gdsassociates.com

Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave

Subject: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Attached above is Rocky Mountain Power's Response to UIEC Set 10 (1-17) in Utah docket 10-035-124. Please let me know if you have any trouble opening the attached files.

Thank you,

From:

Baldwin, Vicki

Sent:

Tuesday, April 12, 2011 2:22 PM

To:

'Katherine McDowell'

Cc:

Mark Moench; yvonne.hogle@pacificorp.com; Monson, Gregory B.;

phickey@hickeyevans.com; Reeder, F. Robert

Subject:

RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

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Friday and Monday have gone by. We still have not received your promised "detailed response." Please let us know.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111

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Sent: Thursday, April 07, 2011 6:31 PM

To: Baldwin, Vicki

Cc: Mark Moench; yvonne.hogle@pacificorp.com; Monson, Gregory B.; phickey@hickeyevans.com; Reeder, F. Robert

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Vicki, we are reviewing this issue and plan to send a detailed response to your email tomorrow or Monday. Best regards, Katherine

Katherine McDowell McDowell Rackner & Gibson PC 419 SW 11th Ave, Suite 400 Portland, OR 97205

Direct: (503) 595-3924 Cell: (503) 423-7272 katherine@mcd-law.com

From: Baldwin, Vicki [mailto:VBaldwin@parsonsbehle.com]

Sent: Wednesday, April 06, 2011 2:42 PM

To: Katherine McDowell

Cc: Mark Moench; yvonne.hogle@pacificorp.com; Monson, Gregory B.; phickey@hickeyevans.com; Reeder, F. Robert

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Katherine,

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**From:** Katherine McDowell [mailto:katherine@mcd-law.com]

Sent: Wednesday, April 06, 2011 2:33 PM

To: Baldwin, Vicki

Cc: Mark Moench; yvonne.hogle@pacificorp.com; Monson, Gregory B.; phickey@hickeyevans.com

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

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We have located trade tickets for the Morgan Stanley contracts and are in the process of determining whether these are highly confidential or confidential. If they are confidential, we will provide these by supplemental response to UIEC 9.2. Otherwise, we will make these available for your review, along with the highly confidential risk committee minutes for 2009 that were unavailable on Monday (these were responsive to UIEC 9.9).

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Direct: (503) 595-3924

# Cell: (503) 423-7272 katherine@mcd-law.com

From: Baldwin, Vicki [mailto:VBaldwin@parsonsbehle.com]

Sent: Tuesday, April 05, 2011 4:34 PM

To: Monson, Gregory B.

Cc: Mark Moench; yvonne.hogle@pacificorp.com; phickey@hickeyevans.com; Katherine McDowell; Reeder, F. Robert

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Greg, et al.,

Can you please give us an update as to the status of these data requests, especially those of set 10 objected to in their entirety by the Company.

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From: Monson, Gregory B. [mailto:GBMONSON@stoel.com]

Sent: Monday, April 04, 2011 3:09 PM

To: Baldwin, Vicki

Cc: Mark Moench; yvonne.hogle@pacificorp.com; phickey@hickeyevans.com; katherine@mcd-law.com

Subject: RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Vicki,

I am catching up on these issues, but note again that Katherine McDowell is the attorney handling net power cost issues in the rate case. She would be your best source for information on responses to data requests dealing with net power costs.

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Greg

Gregory B. Monson

STOEL RIVES LLP | 201 S. Main St, Suite 1100 | Salt Lake City, UT 84111-4904

Direct: (801) 578-6946 | Mobile: (801) 599-8146 | Fax: (801) 578-6999

gbmonson@stoel.com | www.stoel.com

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Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave

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Thank you,

From:

Hogle, Yvonne [Yvonne.Hogle@PacifiCorp.com]

Sent:

Tuesday, April 12, 2011 2:26 PM

To:

Baldwin, Vicki; McDowell, Katherine (McDowell & Associates)

Cc:

Moench, Mark; Monson, Gregory (Stoel); phickey@hickeyevans.com; Reeder, F. Robert

Subject:

RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 (1-17)

Hi Vickie:

You will get the supplemental responses to set 10 within 30 minutes. Also, I will have the responses we discussed last night. Set 11, tomorrow. I am not able to get those to you today, but we are working to meet tomorrow's deadline.

Thanks,

Yvonne

From: Baldwin, Vicki [mailto:VBaldwin@parsonsbehle.com]

**Sent:** Tuesday, April 12, 2011 2:22 PM

To: McDowell, Katherine (McDowell & Associates)

Cc: Moench, Mark; Hogle, Yvonne; Monson, Gregory (Stoel); phickey@hickeyevans.com; Reeder, F. Robert

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gbmonson@stoel.com | www.stoel.com

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bvasatag@utah.gov; dannymartinez@utah.gov; Dan Gimble; jacob.thomas@gdsassociates.com

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'Hogle, Yvonne'

Cc:

Taylor, Dave; 'datarequest@pacificorp.com'; Reeder, F. Robert

Subject:

Attachments:

FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 Supplemental

UIEC 10.2 1st Supp.docx; UIEC 10.3 1st Supp.docx; UIEC 10.5 1st Supp.docx; UIEC 10.6 1st Supp.docx; UIEC 10.8 1st Supp.docx; UIEC 10.9 1st Supp.docx; UIEC 10.10 1st Supp.docx; UIEC 10.11 1st Supp.docx; UIEC 10.12 1st Supp.docx; UIEC 10.13 1st Supp.docx; UIEC 10.14 1st Supp.docx; UIEC 10.15 1st Supp.docx; UIEC 10.16 1st Supp.docx; UIEC 10.17 1st

Supp.docx; UT 10-035-124 UIEC Set 10 (1-17) 4-12-11 pdf

## Yvonne,

We do not feel that these answers are responsive. PacifiCorp and MidAmerican Energy have common officers and the documents are in the possession or control of those common officers and therefore, we think you do have access to any documents that would be necessary to provide more responsive answers.

Nevertheless, because we weren't getting responsive answers before, we crafted what we hope are more detailed and articulate requests in our Set 20. They are due on April 29. If we get responses similar to these, we will have a motion to compel ready to file.

Please call me if you would like to discuss to try to work this out prior to April 29.

Thank you.

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111 email: vbaldwin@parsonsbehle.com

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From: McNay, Kaley [mailto:Kaley.McNay@PacifiCorp.com]

**Sent:** Tuesday, April 12, 2011 2:38 PM

To: Reeder, F. Robert; Evans, William; Baldwin, Vicki; <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a>; <a href="mailto:gdodqe@hidlaw.com">gdodqe@hidlaw.com</a>;

khiqqins@energystrat.com; ntownsend@energystrat.com; pjm@bbrslaw.com; ejl@bbrslaw.com; 'Data Request DPU';

bvastag@utah.gov; dannymartinez@utah.gov

Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave

Subject: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 Supplemental

Attached above is Rocky Mountain Power's Response to UIEC Set 10 Supplementals in Utah docket 10-035-124. Please let me know if you have any trouble opening the attached file(s).

Thank you,

From:

Hogle, Yvonne [Yvonne.Hogle@PacifiCorp.com]

Sent:

Tuesday, April 12, 2011 9:24 PM

To: Cc: Baldwin, Vicki Reeder, F. Robert

Subject:

Re: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 Supplemental

I'll see if we can work it out Vicki and let you know as soon as I discuss with the group. Hopefully we can reach an agreement to avoid a motion.

Thanks,

Yvonne

From: Baldwin, Vicki < VBaldwin@parsonsbehle.com>

To: Hogle, Yvonne

Cc: Taylor, Dave; Data Request Response Center; Reeder, F. Robert < FRReeder@parsonsbehle.com >

**Sent**: Tue Apr 12 17:39:41 2011

Subject: FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 Supplemental

#### Yvonne.

We do not feel that these answers are responsive. PacifiCorp and MidAmerican Energy have common officers and the documents are in the possession or control of those common officers and therefore, we think you do have access to any documents that would be necessary to provide more responsive answers.

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Thank you.

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email: vbaldwin@parsonsbehle.com

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From: McNay, Kaley [mailto:Kaley.McNay@PacifiCorp.com]

**Sent:** Tuesday, April 12, 2011 2:38 PM

**To:** Reeder, F. Robert; Evans, William; Baldwin, Vicki; <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">pjm@bbrslaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">Data Request DPU</a>; <a href="mailto:gdodge@hjdlaw.com">bbrslaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">Data Request DPU</a>; <a href="mailto:gdodge@hjdlaw.com">bbrslaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">Data Request DPU</a>; <a href="mailto:gdodge@hjdlaw.com">bbrslaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:gdodge.gdodge.gdodge.gdodge.gdodge.gdo

Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave

Subject: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 10 Supplemental

Attached above is Rocky Mountain Power's Response to UIEC Set 10 Supplementals in Utah docket 10-035-124. Please let me know if you have any trouble opening the attached file(s).

Thank you,

From:

Vicki M. Baldwin

Sent:

Thursday, April 28, 2011 3:36 PM

To:

Vicki M. Baldwin; Hogle, Yvonne

Cc: Subject: Taylor, Dave; datarequest@pacificorp.com; F. Robert Reeder

RE: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 19 (1-13)

Yvonne,

I found the Company's supplement to our 10.3. It was provided on April 12. However, we find it, and therefore several of the responses to our set 19, to be unresponsive. This seems to be the issue upon which we are not going to get any responsive answers from the Company. We have another set, set 20, with questions on the same subject and those responses are due tomorrow. It is our position that because the financial officers of the companies are the same, we should be able to gain this information from the Company. As I've indicated before, it is not an issue we can back away from. We will file a motion to compel if necessary.

From: Vicki M. Baldwin

Sent: Wednesday, April 27, 2011 5:45 PM

To: Hogle, Yvonne

Cc: Taylor, Dave; <a href="mailto:datarequest@pacificorp.com">datarequest@pacificorp.com</a>; F. Robert Reeder

**Subject:** FW: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 19 (1-13)

Yvonne,

The responses to 19.2, 19.9, 19.11, 19.12 says to see the supplemental to 10.3...we never received a supplement to 10.3. Please advise when we can see that.



A (\*GREENBASE.

Vicki M. Baldwin
Attorney at Law
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, UT 84111
Direct Dial 801.536.6918
Facsimile 801.536.6111

www.parsonsbehle.com

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Thank you, Parsons Behle & Latimer.

From: McNay, Kaley [mailto:Kaley.McNay@PacifiCorp.com]

Sent: Wednesday, April 27, 2011 4:23 PM

**To:** F. Robert Reeder; William J. Evans; Vicki M. Baldwin; <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a>; <a href="gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:com">Data Request DPU'</a>; <a href="mailto:bvastag@utah.gov">bvastag@utah.gov</a>; <a href="mailto:dannymartinez@utah.gov">dannymartinez@utah.gov</a>; <a href="mailto:Dennis Miller">Dennis Miller</a>; <a href="mailto:Nancy Kelly</a>; <a href="mailto:glocalcom">glocalcom</a>; <a href="mailto:gdodge@hjdlaw.com">glocalcom</a>; <a href="mailto:dannymartinez@utah.gov">pim@bbrslaw.com</a>; <a href="mailto:glocalcom">glocalcom</a>; <a href="mailto:gdodge@hjdlaw.com">glocalcom</a>; <a href="mailto:gdodge@hjdlaw.com">pim@bbrslaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">glocalcom</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">pim@bbrslaw.com</a>; <a href="mailto:gdodge@hjdlaw.com">glocalcom</a>; <a href="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a hre="mailto:gdodge@hjdlaw.com">gdodge@hjdlaw.com</a>; <a href="mailt

Cc: Watkins, Betsy; Bell, Barry; Chaney, Christy; Eissler, Amy; Taylor, Dave

Subject: UT 10-035-124 Rocky Mountain Power's Response to UIEC Set 19 (1-13)

Attached above is Rocky Mountain Power's Response to UIEC Set 19 (1-13) in Utah docket 10-035-124. Please let me know if you have any trouble opening the attached file(s).

Thank you,

From:

Vicki M. Baldwin

Sent:

Tuesday, May 03, 2011 2:01 PM

To:

Hogle, Yvonne

Cc:

F. Robert Reeder; Taylor, Dave; Data Request Response Center

Subject:

FW: 20th set of data request to RMP

Attachments:

20th Set of DR of UIEC to RMP.doc

# Yvonne,

The responses to these were due last Friday. As of right now, we have still not received the responses (even though I see the Company has referenced the response in response to OCS set 19). When can we expect them?



A Peterserony.

Vicki M. Baldwin
Attorney at Law
Parsons Behle & Latimer
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Salt Lake City, UT 84111
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Thank you, Parsons Behle & Latimer.

From: Baldwin, Vicki

**Sent:** Friday, April 08, 2011 5:24 PM

To: 'Patricia Schmid'; 'mbeck@utah.gov'; Taylor, Dave; <a href="mailto:yvonne.hogle@pacificorp.com">yvonne.hogle@pacificorp.com</a>; Mark Moench; 'datarequest@pacificorp.com'; 'Cheryl Murray'; 'Dan Gimble'; 'pproctor@utah.gov'; 'chrisparker@utah.gov'; 'wpowell@utah.gov'; 'Dennis Miller'; 'Gary A Dodge'; Kevin Higgins; <a href="mailto:NTownsend@energystrat.com">NTownsend@energystrat.com</a>; 'pjm@bbrslaw.com'; 'elacey@bbrslaw.com'; 'sfmecham@cnmlaw.com'; 'Sophie Hayes'; 'sarah@utahcleanenergy.org'; 'Holly Rachel Smith'; 'kboehm@BKLlawfirm.com'; 'ryan@kellybramwell.com'; 'stephen.chriss@wal-mart.com'; 'sbaron@jkenn.com'; 'shayla.mcneill@tyndall.af.mil'; 'bertelsens@ballardspahr.com'; 'rdubuc@westernresources.org'; Steve Michel; 'karen.white@tyndall.af.mil'; Mike Legge; 'ghk@pkhlawyers.com'; 'jrc@pkhlawyers.com'; 'gloria.smith@sierraclub.org'; 'jbriesemeister@aarp.org'; 'roger.swenson@prodigy.net'; 'nkelly@westernresources.org'; 'rparker@fbfs.com'; 'bplenk@igc.org'; 'leland.hogan@fbfs.com'; Arthur Sandack; 'Sonya Martinez'; Betsy Wolf

Cc: Reeder, F. Robert; Dubois, Colette; Seat, Rebecca; Constantin, Anca

Subject: 20th set of data request to RMP

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111

email: vbaldwin@parsonsbehle.com

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From:

Hogle, Yvonne [Yvonne.Hogle@PacifiCorp.com]

Sent:

Tuesday, May 03, 2011 2:10 PM

To:

Vicki M. Baldwin

Cc:

F. Robert Reeder: Taylor, Dave: Data Request Response Center

Subject:

RE: 20th set of data request to RMP

Hi Vicki:

I just called the responder and was informed that he will try very hard to finish tonight. So I informed him that we had to have them by tomorrow.

If he gets them to me tonight, I will forward to you. But you should receive them for certain tomorrow.

Thanks,

**Yvonne** 

From: Vicki M. Baldwin [mailto:VBaldwin@parsonsbehle.com]

Sent: Tuesday, May 03, 2011 2:01 PM

To: Hogle, Yvonne

Cc: F. Robert Reeder; Taylor, Dave; Data Request Response Center

Subject: FW: 20th set of data request to RMP

Yvonne.

The responses to these were due last Friday. As of right now, we have still not received the responses (even though I see the Company has referenced the response in response to OCS set 19). When can we expect them?



A Professiones Est Caupaidina Vicki M. Baldwin
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Thank you, Parsons Behle & Latimer.

From: Baldwin, Vicki

Sent: Friday, April 08, 2011 5:24 PM

**To:** 'Patricia Schmid'; 'mbeck@utah.gov'; Taylor, Dave; <u>yvonne.hogle@pacificorp.com</u>; Mark Moench; 'datarequest@pacificorp.com'; 'Cheryl Murray'; 'Dan Gimble'; 'pproctor@utah.gov'; 'chrisparker@utah.gov'; 'wpowell@utah.gov'; 'Dennis Miller'; 'Gary A Dodge'; Kevin Higgins; <u>NTownsend@energystrat.com</u>; 'pjm@bbrslaw.com'; 'elacey@bbrslaw.com'; 'sfmecham@cnmlaw.com'; 'Sophie Hayes'; 'sarah@utahcleanenergy.org'; 'Holly Rachel Smith'; 'kboehm@BKLlawfirm.com'; 'ryan@kellybramwell.com'; 'stephen.chriss@wal-mart.com'; 'sbaron@jkenn.com';

'shayla.mcneill@tyndall.af.mil'; 'bertelsens@ballardspahr.com'; 'rdubuc@westernresources.org'; Steve Michel; 'karen.white@tyndall.af.mil'; Mike Legge; 'ghk@pkhlawyers.com'; 'jrc@pkhlawyers.com'; 'gloria.smith@sierraclub.org'; 'jbriesemeister@aarp.org'; 'roger.swenson@prodigy.net'; 'nkelly@westernresources.org'; 'rparker@fbfs.com'; 'bplenk@igc.org'; 'leland.hogan@fbfs.com'; Arthur Sandack; 'Sonya Martinez'; Betsy Wolf Cc: Reeder, F. Robert; Dubois, Colette; Seat, Rebecca; Constantin, Anca Subject: 20th set of data request to RMP

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 Telephone: 801-532-1234 Facsimile: 801-536-6111 email: <a href="mailto:vbaldwin@parsonsbehle.com">vbaldwin@parsonsbehle.com</a>

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