

# **Exhibit G**

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

**TWELFTH SET OF DATA REQUESTS  
OF UIEC, AN INTERVENTION GROUP,  
TO ROCKY MOUNTAIN POWER**

Docket No. 10-035-124

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The Utah Industrial Energy Consumers (“UIEC”) hereby submits its twelfth set of data requests in this docket to Rocky Mountain Power (“RMP” or the “Company”). Please provide your responses to the following:

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**UIEC REQUEST 12-1:** Please provide for the test years ending June 2011 and June 2012 an updated Jim Bridger fuel price that excludes expenses for fines and citations and related legal fees, as well as the supporting workpapers with all cells and formulae intact.

**UIEC REQUEST 12-2:** Please provide for the test years ending June 2011 and June 2012 an updated fuel price for Utah coal generation plants served by Energy West that excludes expenses for legal fees related to fines and citations, as well as the supporting workpapers with all cells and formulae intact.

**UIEC REQUEST 12-3:** Please update hydro normalization to include forced outages and planned outages for the 48-month period ended June 2010 and provide the updated GRID inputs and supporting workpapers with all cells and formulae intact.

**UIEC REQUEST 12-4:** Regarding firm purchases from the wholesale market, please explain any volumetric limitations faced by the Company and the extent of those limitations seasonally and annually for the East and West control areas.

**UIEC REQUEST 12-5:** Are Morgan Stanley contracts p272154, p272153, p272156, p272157 and p272158 classified as hedging contracts? If yes, please provide the date of designation. If no, please indicate the date they were undesignated or whether they were ever designated as hedging contracts for accounting purposes.

**UIEC REQUEST 12-6:** Please provide in excel format by month the HLH and LLH energy sales made to Black Hills for the 48-month period ended June 2010 segregated by market delivery point.

**UIEC REQUEST 12-7:** Please provide a copy of PacifiCorp's 2010 FERC Form 1.

**UIEC REQUEST 12-8:** For each project listed on Exhibit RMP (DTG-1), and every other transmission project projected to cost \$5.0 million or more, that has been, or is expected to be, placed in-service between January 1, 2009 and December 31, 2012,

(a) Please state whether, and if so, describe in narrative terms, how the **GRID model** has taken into account the effect of the proposed project upon:

(i) TTC and ATC at each interconnection of the PacifiCorp and RMP transmission systems with non-TDU entities;

(ii) All relevant WECC Path Ratings; and

(iii) The amount of transfer capability available for sale of Long-Term Firm Point to Point transmission service (e.g., for use by PacifiCorp or others in making off-system sales or engaging in arbitrage transactions);

(b) The dollar amount by which PacifiCorp was able to reduce its net power cost as a result of completing the project, both standing alone and in combination with all other such projects, as compared to the scenario in which no such transmission projects were completed.

**UIEC REQUEST 12-9:** The TransWest Express website indicates the history of its project includes:

**2006** *National Grid, an international energy delivery company that delivers electricity and natural gas, and the Wyoming Infrastructure Authority joined APS in the development of the TWE Project in 2006.*

**2007** *The three project sponsors agreed with PacifiCorp to jointly study the TWE Project along with PacifiCorp's Gateway South transmission project – a 500kV AC transmission line that roughly follows a similar route as the TWE Project, from Wyoming to central Utah into Nevada. Together, the group analyzed several conceptual design alternatives to satisfy the combined need for the two projects; developed a conceptual design for each project; performed a comprehensive corridor study for the projects; and submitted coordinated right-of-way*

*applications to the Bureau of Land Management. The group also jointly conducted the Western Electricity Coordinating Council's Regional Planning Project Review for the two projects and entered the projects into the WECC rating process in January 2008. This process ensures that new projects are properly integrated into the existing transmission grid.*

The WestConnect 2010 draft transmission plan report states (at 43 of 593):

*In July 2008, acquisition of the rights to the TransWest Express Transmission Project by Anschutz Corporation has resulted in National Grid and Wyoming Infrastructure Authority ("WIA") choosing to withdraw from the TransWest Express project and Arizona Public Service ("APS") is choosing to reduce its involvement. Anschutz Corporation formed TransWest Express, LLC that is the current sponsor of the TransWest Express Project. TransWest Express completed the WECC Regional Planning Process Review ("RPPR") in May 2008 [footnote omitted] including project stakeholder meetings and input from regional and sub-regional groups. TransWest Express also completed a conceptual technical analysis that included review and refinement of design parameters, evaluation of alternative configurations for TransWest Express and Gateway South projects and conceptual scope development and cost estimates. [footnote omitted] Additionally, in 2008 TransWest Express completed an economic analysis of the western United States called The West's Renewable Energy Future. [footnote omitted]*

Based on this, please describe:

- (a) The status of the WECC's Regional Planning Project Review and rating process that were initiated jointly for Gateway South and the TransWest Express Transmission Project in January 2008 and provide a copy of all documents related to, arising from or used in connection therewith; and
- (b) All agreements (oral and written, express and implied) between PacifiCorp, Anschutz Corporation and Transwest Express, LLC and their affiliates related to integrating the planning, operation, financing, interconnection, transfer capabilities, interconnection of wind projects, gathering systems for wind power, off-system sales of power, right-of-way acquisition, and other aspects of Gateway South and the TransWest Express Transmission Project and provide copies of all

such agreements that were reduced to writing. Please include in, but do not limit your response to, agreements related to:

- (i) Interconnecting Gateway South with the TransWest Express Transmission Project;
- (ii) Cost sharing;
- (iii) Planning and/or permitting the facilities of Gateway South and the TransWest Express Transmission Project as a single system;
- (iv) Jointly developing the facilities of Gateway South and the TransWest Express Transmission Project;
- (v) Operating the facilities of Gateway South and the TransWest Express Transmission Project as a single system or as part of Energy Gateway;
- (vi) Offering transmission service over the combined facilities pursuant to a single open access transmission tariff (“OATT”) and/or offering transmission service on the TransWest Express Transmission Project as part of PacifiCorp’s OATT;
- (vii) Forming a separate transmission owner, ISO or RTO to include the joint facilities;
- (viii) Seeking FERC incentive rate approval for the joint facilities;
- (ix) Sharing the remaining transfer capacity after, and the economic impact of, curtailments;
- (x) Coordinating and/or sharing transfer capacity during scheduled and forced outages of transmission facilities;

(xi) Increasing the transfer capability of the combined projects by means of control systems applied to the DC inverters that enhance dynamic and steady state performance of AC facilities operating in parallel;

(xii) Sharing rights-of-ways and easements;

(xiii) Sharing the costs of permitting;

(xiv) Sharing the workforce to conduct maintenance and construction;

(xv) Coordinated right-of-way applications to the Bureau of Land

Management;

(xvi) Interconnection of wind projects;

(xvii) Developing gathering systems for wind power; and

(xviii) Allocating or otherwise sharing off-system sales of power.

DATED this 21st day of March, 2011.

/s/ Vicki M. Baldwin  
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**CERTIFICATE OF SERVICE**

(Docket No. 10-035-124)

I hereby certify that on this 21st day of March 2011, I caused to be emailed, a true and correct copy of the foregoing **TWELFTH SET OF DATA REQUESTS OF UIEC, AN INTERVENTION GROUP, TO ROCKY MOUNTAIN POWER** to:

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