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July 14, 2011

**VIA EMAIL
AND OVERNIGHT DELIVERY**

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RE: UT Docket No. 10-035-124
UIEC 29th Set Data Request (1-12)

Please find enclosed Rocky Mountain Power's 1st Supplemental Response to UIEC 29th Set Data Request 29.2. Provided on the enclosed Confidential CD is Confidential Attachment UIEC 29.2 1st Supplemental. Confidential information is provided subject to the terms and conditions of the protective order in this case.

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
July 14, 2011
UIEC Data Request 29.2, 1st Supplemental

UIEC Data Request 29.2

Reference is made to your response to DPU Data Request 14.3, wherein it is disclosed that approximately 8% of the utilization of the PacifiCorp transmission system is used by non-OATT network service.

- a) Please identify those persons who receive non-OATT network service and explain how the revenues associated with that transportation are accounted for in the revenue requirements.
- b) Is the revenue received for the service equal to or greater than the currently published transmission rates?
- c) Are these users charged the same transportation rate as other users of the transmission system?
- d) Will the transmission rates of these non-OATT network service customers increase when PacifiCorp increases its rates in its proposed 2011 OATT filing?

1st Supplemental Response to UIEC Data Request 29.2

- a) In reference to the load ratio share data provided in response to DPU Data Request 14.3, please refer to Confidential 1st Supplemental Attachment UIEC 29.2, which contains back up calculations used for the referenced 2010 load ratio share calculation and which identifies specific non-OATT network customers who contributed to coincidental system peak for purposes of the calculation. These customers are also listed in PacifiCorp's recent FERC Form 1 at pages 328-330 for contracts listed with a statistical classification of "OS" (other transmission service). These contracts comprise PacifiCorp's non-OATT service. All revenues collected under such non-OATT contracts are revenue-credited back to retail rates. Confidential information is provided subject to the terms and conditions of Commission Rule 746-100-16.
- b) The revenues resulting from these contractual arrangements are determined according to the rates and billing determinants contained in the contracts for the services provided thereunder. Such contracts generally pre-date the Federal Energy Regulatory Commission's open access policies and the *pro forma* OATT. Accordingly, the services provided under such contracts, including the billing determinants and the revenues are not equivalent to OATT service and rates and will vary by contract.
- c) Please refer to the Company's response to part b) above.
- d) The transmission rates of these non-OATT service customers will not automatically change upon the approval of updated rates for PacifiCorp's OATT. Generally, PacifiCorp must file separate rate change applications at FERC in order to update contractual rates of non-OATT service customers.