

**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

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)))))))))	Docket No. 10-035-124 Sierra Club Data Requests Set 4
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INSTRUCTIONS

1. Responses to any and all of Sierra Club’s data requests should be supplied to Sierra Club as soon as they become available to Rocky Mountain Power.
2. The requests herein shall be deemed to be continuing in nature and Rocky Mountain Power is requested to supplement its responses as necessary and as additional information becomes available.
3. Please reproduce the data request being responded to before the response.

**DATA REQUESTS
THIRD SET OF DATA REQUESTS OF SIERRA CLUB TO ROCKY
MOUNTAIN POWER**

- 4.1. Regarding the CAI Capital Projects study provided in DPU 24.13. Please provide workpapers for the CAI Capital Projects studies associated with both the 2008-2009 and 2011 Business Plans, including Excel or other spreadsheet workbooks used to generate the “Cumulative Incremental PVR(d) Benefit” graphs, with formulae intact.
- 4.2. CAI Capital Projects study: Please provide assumptions for both the 2008-2009 and 2011 Business Plans and for each unit in this study, including:
 - a. Fuel prices for each year;

- b. Annual heat rates;
- c. Annual forced outage rates;
- d. Annual capacity factors;
- e. Annual variable and fixed O&M costs;
- f. Annual undepreciated values for each plant;
- g. Capital expenses for any modeled or assumed environmental upgrades (FGD, SCR, LNB, OFA, ACI, baghouses, cooling towers, etc...);
- h. Other expected capital expenditures, including life extension projects or any other annual or expected capital expenditures;
- i. The book life for each environmental upgrade;
- j. The assumed recovery rate or capital recovery factor
- k. SO₂ emissions costs

4.3. CAI Capital Projects study: Does the cost of retirement include:

- a. The undepreciated value of the environmental upgrade or upgrades?
- b. The undepreciated value of the balance of plant?
- c. The costs of coal impoundment or landfill closure?
- d. Other costs associated with closure aside from the "\$40 per installed kW"? If so, please explain.

4.4. CAI Capital Projects study: Was a study of this form, or any similar form (including a continued use study, or utilization study), performed for the Carbon or Dave Johnston units? If not, why not? If so, please provide the analyses and workpapers which are responsive, including details as provided in requests 1-3, above.

4.5. Regarding testimony given by witness Senior Vice President Cathy Woollums at the US Senate, dated June 15, 2011, please provide:

- a. A detailed explanation of the term "Under Review" in the column entitled "Potential to Operate on Full Load Natural Gas" in Figure 3 of the testimony;
- b. Studies or analysis performed by either PacifiCorp or MEHC on the "potential to operate on full load natural gas" for Carbon 1 and 2, and Dave Johnston 1 & 2, as stipulated by the term "Under Review" in Figure 3;

- c. Details of plans for “CCB Compliance” for all units in the 2015 timeframe, including “Pond Closure, wet-to-dry conversion, new facilities” as stipulated in Figure 3;
- d. Analysis or workpapers associated with plans for “CCB Compliance” which are responsive to request 5.c;
- e. Costs and workpapers supporting cost estimates for any plans which are responsive to request 5.c.

Respectfully submitted,

Original signed by: _____

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th of July, 2011, a true copy of the foregoing document was sent via email to the following:

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