

that the company did not model alternatives to test for the cost effectiveness of the environmental upgrades before irreversible decisions were made. Such actions are not in the best interest of ratepayers and cannot be deemed prudent.

Witness List

Sierra Club will call for cross examination Rocky Mountain Power witnesses Chad A. Teply, Cathy S. Woollums, Richard Sprott, and Howard Ellis. Sierra Club will make available for cross examination its expert witnesses William Steinhurst and Jeremy Fisher.

DATED: July 29, 2011.

Respectfully submitted,

Original signed by: _____
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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of July, 2011, I caused to be emailed a true and correct copy of the foregoing **SIERRA CLUB ISSUE STATEMENT AND WITNESS LIST IN PREPARATION FOR HEARING IN OPPOSITION TO STIPULATION TO SETTLE REVENUE REQUIREMENT** in Docket No. 10-035-124 to the following:

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