

UAE Data Request 3.5

Confidential Attachment UAE 5.2 provided by RMP in response to UAE Data Request 5.2 in this docket provides five public and two approved budget REC Revenue projections. Please provide any other projections of REC Revenues for any part of 2009 or 2010 made by or for RMP at any time from September 2009 through March 2010, including any non-public or informal projections, and with respect to each such projection, provide the date such projection was prepared or made and the amount of MWH sales and REC Revenues projected for any part of 2009 or 2010.

Response to UAE Data Request 3.5

Pursuant to agreement between Rocky Mountain Power and UAE, the following response is made and provided in Docket No. 10-035-89.

Rocky Mountain Power objects to providing the requested information on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. This docket is limited to alternative cost recovery for certain major plant additions. Rocky Mountain Power also objects on the grounds that providing the requested information is unduly burdensome.

Without waiving these objections and pursuant to agreement between Rocky Mountain Power and UAE, Rocky Mountain Power will explain the types of preliminary and informal projections of Renewable Energy Credit (REC) revenues that it makes, explain why it is burdensome to provide all such projections for 2009 and 2010 to UAE and provide the routine preliminary and informal projections for the period from October 2009 through March 2010. In addition, Rocky Mountain Power will provide the same type of projections made during April 2009 for comparison purposes. These projections are provided in Confidential Attachment UAE 3.5 and are provided subject to Rule R746-100-16.

Approximately once per week, PacifiCorp Energy prepares a preliminary and informal projection of REC revenues to be realized during the current year for the internal use of PacifiCorp Energy. These preliminary and informal projections are shown on Confidential Attachment UAE 3.5. Approximately once per month, PacifiCorp Energy prepares a preliminary and informal projection of REC revenues to be realized during the current year. On the last day of each month, PacifiCorp Energy prepares a projection of REC revenues to be realized during the current year. Rocky Mountain Power prepared projections of REC revenues for the proposed test period in its two most recent general rate cases in Utah and in general rate cases filed in other states during the same period. Finally, PacifiCorp prepares annual budgets that have included, in recent years, a projection of REC revenues for the next year.

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Given the wide variety and number of preliminary and informal projections of REC revenues, it would be unduly burdensome to provide all of them to UAE. In addition, it is not clear that PacifiCorp Energy retains all preliminary and informal projections and determining whether they may be reflected in any document retained by the Company would be unduly burdensome. Rocky Mountain Power has already provided the projections of REC revenues for 2009 and 2010 included in the general rate cases filed during the period in question and the budgets for those years in response to UAE Data Request 5.2 in Docket No. 09-035-15.