

**Before the Utah Public Service Commission**

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<b>In the Matter of the Pending</b>	)	
<b>Application of Rocky Mountain Power</b>	)	
<b>for a Certificate of Convenience and</b>	)	<b>Docket No. 12-035-97</b>
<b>Necessity Authorizing Construction of</b>	)	
<b>the Sigurd-Red Butte No. 2 345 kV</b>	)	<b>DPU Exhibit 1.0-SD</b>
<b>Transmission Line</b>	)	

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**FOR THE DIVISION OF PUBLIC UTILITIES  
DEPARTMENT OF COMMERCE  
STATE OF UTAH**

**Supplemental Direct Testimony**

**of**

**Joni S. Zenger, PhD**

**January 16, 2013**

1                   **Supplemental Direct Testimony of Joni S. Zenger, PhD**

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3   **Q.    Please state your name, occupation, and business address.**

4    A.    My name is Dr. Joni S. Zenger. I am employed by the Division of Public Utilities  
5           (Division) of the Utah Department of Commerce as a Technical Consultant. My  
6           business address is 160 East 300 South, Salt Lake City, Utah, 84111.

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8   **Q.    Did you file Direct Testimony on December 21, 2012?**

9    A.    Yes.

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11   **Q.    What is the purpose of your Supplemental Direct Testimony in this matter?**

12   A.    My Direct Testimony contains several footnotes that cited the sources I used for  
13           gathering information. Those sources included data requests received by the  
14           Division. My Supplemental Testimony provides the actual data requests that  
15           were referenced in my Direct Testimony in the following footnotes: 13, 17-22, 24,  
16           and 25-27.

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18   **Q.    Will you explain how you have organized the Supplemental Testimony that**  
19           **you are now filing?**

20   A.    Yes. DPU Exhibits 1.1-SD through 1.8-SD set forth the data requests data  
21           requests and PacifiCorp's (the Company) responses used by the Division in its

22 analysis. For clarity purposes and ease of reference, I have prepared Table 1  
23 below that describes the contents of each exhibit that I am attaching to this  
24 testimony. The table is organized to show each footnote number, the page and  
25 line number in my Direct Testimony where each respective footnote is located,  
26 and the data request numbers that were referenced in each respective footnote.  
27 Please note that footnotes 13, 17, 25, and 27 reference confidential attachments to  
28 data responses provided by the Company.

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**Table 1**  
DPU = (Division of Public Utilities), OCS = (Office of Consumer Services)

Exhibit Number	Footnote(s) Number	Location of Footnote in Direct Testimony	Data Response Number(s)
DPU Exhibit 1.1-SD	13	p. 6, line 112	Confidential Attachment OCS 1.1 (1)
DPU Exhibit 1.2-SD	17	p. 8, line 131	Confidential Attachment OCS 1.2
DPU Exhibit 1.3-SD	18, 19	p.8, line 139; p. 8, line 140	OCS 2.4
DPU Exhibit 1.4-SD	20, 21, 22	p. 8, line 146; p. 9, line 160; p. 10, line 179	Attachment DPU 1.15
DPU Exhibit 1.5-SD	24	p. 10, line 179	DPU 1.6, DPU 1.9, DPU 1.19
DPU Exhibit 1.6-SD (a) through (d)	25	p. 11, line 188	Confidential Attachment DPU 1.19 (a) and 1.19(b), Confidential Attachments DPU 4.1 and 4.2
DPU Exhibit 1.7-SD	26	p. 11, line 189	DPU 1.4, OCS 1.4
DPU Exhibit 1.8-SD	27	p. 11, line 193	Confidential DPU 1.12

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**Q. Does that conclude your Supplemental Direct Testimony?**

A. Yes.