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Attorneys for Intervenors

BEFORE THE UTAH UTILITY FACILITY REVIEW BOARD

ROCKY MOUNTAIN POWER,

Petitioner,

vs.

WASATCH COUNTY,

Respondent.

MARK 25, LLC; BLACK ROCK RIDGE
MASTER HOMEOWNERS
ASSOCIATION, INC.; BLACK ROCK
RIDGE TOWNHOME OWNERS
ASSOCIATION, INC.; BLACK ROCK
RIDGE CONDOMINIUM ASSOCIATION,
INC.,

Intervenors.

NOTICE OF DEPOSITION

(Rocky Mountain Power)

Docket No. 16-035-09

PLEASE TAKE NOTICE that on Wednesday, April 27, 2016 at 10:00 a.m. at the offices of **Bennett Tueller Johnson & Deere, located at 3165 E. Millrock Drive, Suite 500, Salt Lake City, Utah 84121**, Intervenors Mark 25, LLC, Black Rock Ridge Master Homeowners Association, Inc., Black Rock Ridge Townhome Owners Association, Inc., and Black Rock Ridge Condominium Association, Inc. will take the deposition of Petitioner Rocky Mountain

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of April 2016, I caused a true and correct copy of the foregoing **NOTICE OF DEPOSITION** to be served upon each of the following as indicated below:

By Electronic-Mail:

Beth Holbrook (bholbrookinc@gmail.com)
Utah League of Cities and Towns

David Wilson (dwilson@co.weber.ut.us)
Utah Association of Counties

Data Request Response Center (datarequest@pacificorp.com)
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Robert C. Lively (bob.lively@pacificorp.com)
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Rocky Mountain Power

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Assistant Utah Attorneys General

By U.S. Mail:

Promontory Development, LLC and
Promontory Investments, LLC

Mark O. Morris (mmorris@swlaw.com)
Snell & Wilmer LLP
15 West South Temple, Suite 1200
Salt Lake City, UT 84101

Division of Public Utilities
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Office of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, Utah 84111

/s/ Jeremy C. Reutzel

EXHIBIT A

Pursuant to Utah Rule of Civil Procedure 30(b)(6), Rocky Mountain Power is directed to designate one or more officers, directors, managing agents, or other persons to testify on its behalf regarding the following topics:

1. The location and scope of the easement in favor of RMP across property owned by Promontory Investments, LLC, or Promontory Development, LLC (collectively “*Promontory*”), in Summit County, Utah, where Rocky Mountain Power’s presently existing 46 kV transmission line is located (the “*Original Easement*”);

2. The location and scope of the new easement Promontory has granted RMP for the relocation of the transmission line to another portion of its property near the border of Wasatch County and Summit County (the “*New Easement*”);

3. Any agreements RMP has reached regarding the relocation of the transmission line, including the negotiations which preceded any agreement;

4. Communications between RMP and Promontory regarding the Original Easement and the New Easement;

5. The factual basis for RMP’s claim that relocating the transmission line from the Old Easement to the New Easement is necessary for RMP to provide safe, reliable, adequate, and efficient service to its customers;

6. Safety risks associated with constructing an upgraded transmission line on the Original Easement and/or the New Easement;

7. Any adverse effects to the reliability, adequacy, and efficiency of service to RMP's customers if an upgraded transmission line is constructed on the Original Easement or the New Easement;
8. The "standard cost" (as defined in Utah Code section 54-14-103(9)(a)) of constructing an upgraded transmission line on either the Original Easement or the New Easement;
9. RMP's negotiations and communications with landowners adjacent to the proposed transmission line who have not granted RMP a new, updated, or revised easement in connection with RMP's efforts to upgrade the transmission line;
10. All documents and applications RMP has submitted to Summit County or Wasatch County regarding the proposed upgraded transmission line as they relate to RMP's ability to prove safe, reliable, adequate, and efficient to service to RMP's customers;
11. Studies, evaluations, or reports RMP has either conducted or hired another entity or person to conduct regarding the safe, reliable, adequate, and efficient service associated with constructing the upgraded transmission line on either the Original Easement or the New Easement;
12. RMP's responses to discovery requests;
13. All documents RMP has produced in response to discovery requests;
14. RMP's efforts to locate documents and other information in response to Intervenors' discovery requests; and
15. RMP's document retention policies.