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SERVED CONTRACTOR

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF UTAH POWER & LIGHT COMPANY, AND PC/UP&L MERGING CORP. (TO BE RENAMED PACIFICORP) FOR AN ORDER AUTHORIZING THE MERGER OF UTAH POWER & LIGHT COMPANY AND PACIFICORP INTO PC/UP&L MERGING CORP. AND AUTHORIZING THE ISSUANCE OF SECURITIES, ADOPTION OF TARIFFS, AND TRANSFER OF CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY AND AUTHORITIES IN CONNECTION THEREWITH.

SUMMARY OF TESTIMONY OF ANTON TONC ON BEHALF OF THE UTAH ASSOCIATED MUNICIPAL POWER SYSTEMS AND WASHINGTON CITY

Case No. 87-035-27

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April 18, 1988

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2. The Commission should require the merged company to grant municipal systems and their agents an option to make upgrades to existing facilities at their own expense should wheeling be refused due to capacity limitations or system operational constraints. The PSC would act as an arbiter to resolve issues which the parties could not resolve through negotiation.

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3. If the FERC does not provide for wheeling to UAMPS' members within the state, the wheeling policy applicable to the transmission system inside Utah should be modified and expanded to require the UP&L Division to wheel resources delivered at any of its interconnection points with other systems within Utah to municipal systems to the extent that those interconnections are not being fully utilized to serve UP&L's own customers. The intrastate policy should further encourage, if not require, upgrading for additional transfer capability to allow for greater interstate wheeling.

4. The merged company should be required to report on the status of the negotiations with Santa Clara and LaVerkin pursuant to options granted to those cities to purchase their distribution systems and with Cedar City on its request to have the option renewed.

- 3 -

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF UTAH POWER & LIGHT COMPANY, AND PC/UP&L MERGING CORP. (TO BE RENAMED PACIFICORP) FOR AN ORDER AUTHORIZING THE MERGER OF UTAH POWER & LIGHT COMPANY AND PACIFICORP INTO PC/UP&L MERGING CORP. AND AUTHORIZING THE ISSUANCE OF SECURITIES, ADOPTION OF TARIFFS, AND TRANSFER OF CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY AND AUTHORITIES IN CONNECTION THEREWITH.

SUMMARY OF TESTIMONY OF ANTON TONC ON BEHALF OF THE UTAH ASSOCIATED MUNICIPAL POWER SYSTEMS AND WASHINGTON CITY

Case No. 87-035-27

Enclosed herewith is a summary of the prefiled direct

testimony of Anton Tonc on behalf of intervenors Utah

Associated Municipal Power Systems and Washington City.

DATED this 18th day of April, 1988.

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the within and foregoing SUMMARY OF TESTIMONY OF ANTON TONC to be hand delivered this 18th day of April, 1988 to the following:

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