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Association of Utah

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	:	ESTABLISHED FACTS
PACIFICORP) FOR AN ORDER	:	
AUTHORIZING THE MERGER OF	:	
UTAH POWER & LIGHT COMPANY	:	
AND PACIFICORP INTO PC/UP&L	:	Case No. 87-035-27
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.	:	

Pursuant to the orders of the Commission issued February 26, 1988, and March 31, 1988, the Utility Shareholder Association of Utah ("the Shareholders") served and filed proposed lists of facts to which the parties and the intervenors in these proceedings might stipulate as being uncontroverted and established for purposes of this matter. The facts were listed under outline headings that paralleled in

part the issues in this case as delineated in the September 15, 1987, memorandum to the Commission from its Staff.

Subsequently, on April 25, 1988, deletions and other revisions were made in concert by the parties and intervenors, and thereafter the Commission ordered that the revised list be served upon the parties and intervenors with the requirement that any person contesting any fact notify the Shareholders prior to the commencement of the Commission hearing on May 2, 1988. The Shareholders served and filed the revised list on April 29, 1988, and have to date received no notification from any party or intervenor of any contest of any fact set forth in the revised list. The following facts, then, may be taken as established as true and correct for purposes of this matter. (The mere appearance of an outline heading below, however, with facts listed underneath it, does not constitute any acknowledgement that an issue is necessarily within the jurisdiction of the Commission.)

Each fact is followed by an abbreviated citation to the record presently before the Commission. A key to these abbreviations is set forth in Attachment "A" hereto.

I. ORGANIZATION

A. Existing Corporate Structure.

1. Utah Power & Light ("UP&L") is a Utah corporation qualified to transact business and operate as an electric public utility in Utah, Idaho and Wyoming. Application at 3.

2. UP&L is subject to the jurisdiction of the Federal Energy Regulatory Commission. Application at 3.

3. UP&L services 510,000 retail customers in Southeastern Idaho, Southwestern Wyoming, and major portions of Utah and its service territory extends over approximately 90,000 square miles. Application at 4. [UP&L has a duty to service more than 516,000 customers. Testimony of Frank H. Davis, PSC Hearing TS at 63.]

4. PacifiCorp is a Maine corporation qualified to transact business and operate as a public utility in California, Idaho, Oregon, Montana, Washington, and Wyoming. Application at 3.

5. PacifiCorp is subject to the jurisdiction of the Federal Energy Regulatory Commission. Application at 3.

6. PacifiCorp provides electric service to more than 670,000 retail customers in California, Idaho, Montana, Oregon, Washington, and Wyoming. Its electric service territories total approximately 63,000 square miles. Application at 4.

7. PacifiCorp is a diversified electric utility. DFB at 2.

8. PacifiCorp owns approximately 90% of NERCO, Inc. and 87% of Pacific Telecom, Inc. DFB at 2.

9. Telecom provides local and long-distance telephone and other communication services in Alaska and local service and access to the long-distance network in 7 other western states and Wisconsin. DFB at 3.

10. PacifiCorp is the owner of PacifiCorp Credit, Inc. which is primarily in the business of leasing capital and business equipment and lending against receivables and inventories. DFB at 3.

11. PacifiCorp owns PacifiCorp Finance which provides equity investments in leveraged lease transactions. DFB at 3.

12. The PP&L "board of directors" consists of five members who are members of the PacifiCorp Board and four others. DFB at 16.

B. Proposed Organizational Structure and Applicants' Intentions After the Merger.

13. UP&L and PacifiCorp have entered into an Agreement and Plan of Reorganization and Merger, attached as Exhibit "A" to the Application (hereinafter, "the Merger Agreement"), which sets out generally the Applicants' proposed structure for the Merged Company. Application at 2.

14. The Merged Company was incorporated in Oregon on August 11, 1987. The name of the company will be changed to PacifiCorp on the effective date of the merger. Application at 3.

15. The Merged Company will assume all outstanding debt obligations of UP&L and PacifiCorp, and the Merged Company will adopt all tariff schedules and service contracts of UP&L on file with the Commission and in effect at the time of the merger for service within all territories served prior to the merger by UP&L. Application at 2.

16. The Merged Company will issue shares of common and preferred stock upon conversion of outstanding shares of common and preferred stock of UP&L and PacifiCorp. Application at 2.

17. UP&L's common shareholders will receive between .909 and .957 shares of each new share of PacifiCorp stock and will own more than 40 percent of the shares of the new corporation. Except for shares owned by dissenters, outstanding UP&L preferred stock will be converted to preferred stock of the new corporation. DFB at 14.

18. The common stock of Utah Power will be converted into shares of the new corporation based on a formula derived from PacifiCorp's closing price during a ten-day computation period following final regulatory approval. DFB at 14.

19. The Merged Company will be the surviving entity of the merger. Application at 10.

20. The Merged Company will provide electric service to more than 1,180,000 retail customers throughout California, Idaho, Montana, Oregon, Utah, Washington, and Wyoming. Application at 10.

21. The Merged Company's electric service territory will aggregate approximately 153,000 square miles. Application at 10.

22. The Merged Company will continue to do business in all territories previously served by UP&L and will operate the business formerly conducted by UP&L as a division of the Merged Company under the assumed business name of Utah Power & Light Company. Application at 5-5.

23. The Merged Company will continue to do business in all territories previously served by PacifiCorp under the assumed business name of Pacific Power & Light Company. Application at 5-6.

24. PP&L and UP&L will be operated separately as divisions of PacifiCorp, but it is expected that the two power systems will be operated and planned on a single utility basis. RMB at 3.

25. It is intended that the president of each electric division will serve on the board of the other division. Division Responses VIII; FND at 8.

26. The directors and officers of UP&L at the effective date of the merger will become directors and officers of the Utah Power & Light Company division of the Merged Company. Application at 6.

27. The UP&L "board" will be formed similar to the existing PP&L Board. DFB at 16; FND at 8.

28. The UP&L "board" will have authority over such matters as annual construction budgets, purchase and disposition of utility property, and salaries and benefits. OTC at 5.

29. The Merger Agreement provides that after the merger, two former members of the UP&L Board of Directors and

one person residing in UP&L service territory will be elected to the Board of Directors of the Merged Company; thereafter the Merged Company will seek further representation of persons in UP&L's service territory with the goal of having pro rata representation from UP&L's service territory. DFB at 15.

30. PP&L will continue to serve in Oregon, Washington, Idaho, Wyoming, California and Montana. FND at 9.

31. It is intended by the Applicants that UP&L subsidiaries such as ENI will continue under the present method of consolidation for the near future with earnings of ENI "below-the-line". The relationship will be evaluated in the future to determine whether ENI would appropriately fit into the entire corporate entity under some other arrangement. OTC at 9.

32. The Applicants have no plans to transfer the management or ownership of UP&L's coal properties to NERCO, Inc. DFB at 19-20.

33. It is intended that the UP&L division of the Merged Company will maintain its headquarters in Salt Lake City, Utah. Application at 6; DFB at 15.

34. The Applicants intend that the UP&L division will be afforded the same benefits and treatment as PP&L in the family of PacifiCorp business units. FND at 8.

II. FINANCIAL ISSUES

35. During 1986, UP&L paid \$116,775,000 in tax to various levels of government. This is broken down as follows: Federal government--\$72,440,000; school districts--\$19,338,000; and state and local governments--\$24,998,000. These taxes have provided significant benefits in the public interest to the various constituent groups involved. OTC at 18.

36. It is intended that the UP&L division of PacifiCorp will have a separate board, be afforded the same benefits and treatment as other business units, and will take key roles in defining PacifiCorp's strategy through representation in a corporate policy group and the Merged Company board. Overall financial strategy will be determined by the PacifiCorp board, subject to regulatory approvals. Supp. FDR at 8.

37. UP&L's construction budget is currently approved by the UP&L Board of Directors. Supp. FDR at 7-8.

38. After the merger, long-term capital needed to meet construction needs and other capital requirements of the UP&L division will be raised by PacifiCorp. Supp. OTC at 15.

39. SEC forms 10-K, 10-Q and other SEC required filings will be prepared and filed for PacifiCorp at the corporate (PacifiCorp) level. It is anticipated that consolidation of financial statements will occur at the corporate level (PacifiCorp), although separate financial statements for UP&L and PP&L will continue to be maintained. OTC at 20-21.

III. CURRENT AND PROSPECTIVE LOADS AND LOAD SHAPES

A. Jurisdictional Loads and Forecasts.

1. Current and Historical Peak Load Levels and Total Energy Sales.

40. The historic peak load levels for PP&L are as follows: 1983, 4,380 MW; 1984, 4,245 MW; 1985, 4,253 MW; 1986, 3,841 MW. The historic total energy sales for PP&L were as follows: 1983, 24,403,998 MWh; 1984, 24,430,215 MWh; 1985, 27,117,787 MWh; 1986, 24,808,745 MWh. RMB Ex. 3.23, Tab 22, at 1 and RMB Ex. 3.2.

41. The historic peak load levels for UP&L were as follows: 1983, 2,206 MW; 1984, 2,326 MW; 1985, 2,303 MW; 1986, 2,394 MW. The historic total energy sales for UP&L were as follows: 1983, 17,271,601 MWh; 1984, 18,532,279 MWh; 1985, 19,246,242 MWh; 1986, 17,682,414 MWh. RMB Exhibit 3.23, Tab 22, at 1; RMB Ex. 3.2; and BNH Ex. 6.1.

42. PP&L's peak load occurs in the winter months of November through February; for 1986, the peak occurred on December 9. RMB Ex. 3.22, 7-11; RMB at 10; and BNH at 5-6.

43. UP&L's peak load occurs in the summer months; for 1986, the peak occurred on July 14. RMB Ex. 3.22, n.13; RMB at 10; and BNH at 5-6.

44. During the years 1983-1986, UP&L experienced an increase of 188 MW in firm peak load or 8.5% while PP&L experienced a decrease of 539 MW in peak load, or a minus 12.3%. UP&L's energy sales increased 2.4%, or 0.8% averaged annually, while PP&L had a 1.7% growth. BNH at 5 and BNH Ex. 6.1.

45. The estimated combined system historic jurisdictional energy sales would have been as follows: 1983, 32,142,038 MWh; 1984, 33,497,830 MWh; 1985, 34,497,197 MWh; 1986, 34,300,354 MWh. The estimated combined system historic total energy sales would have been as follows: 1983, 41,675,599 MWh; 1984, 43,012,494 MWh; 1985, 46,364,029 MWh; 1986, 42,491,151 MWh. RMB Exhibit No. 3.2; BNH at 6; BNH Ex. 6.2.

46. The recent historic combined coincident peak loads would have been as follows: 1983, 6,499 MW; 1984, 6,398 MW; 1985, 6,371 MW; 1986, 5,926 MW. RMB EX. 3.23, Tab 22, at 2; BNH at 6; BNH Ex. 6.2.

2. Current and Recent Historic Customer Class Mix of UP&L and PP&L.

47. In 1986, the number of customers for PP&L totalled 709,759, 80% of which were residential, 18% of which were commercial, 1% of which were irrigation, and 1% of which were industrial. In 1986, the number of customers for UP&L totalled 511,269, 89% of which were residential, 9% of which were commercial, and 2% of which were industrial. The number of customers in 1986 for the combined system would have been 1,221,028, 84% of which would have been residential, 14% of which would have been commercial, 1% of which would have been irrigation, and 1% of which would have been industrial. RMB Ex. No. 3.3 and BNH Ex. 6.7.

48. In 1986, the customer sales for PP&L totalled 19,849,119 MWh of which 33% were residential, 25% were commercial, 2% were irrigation, and 40% were industrial. In 1986, the customer sales for UP&L totalled 14,451,235 MWh of

which 25% were residential, 26% were commercial, 3% were irrigation, and 46% were industrial. For the combined system, the customer sales in 1986 would have totalled 34,300,354 MWh, of which 29% would have been residential, 25% would have been commercial, 3% would have been irrigation, and 43% would have been industrial. RMB Ex. No. 3.3 and BNH Ex. 6.7.

49. The class peak loads for UP&L in 1986 were as follows: residential, 892 MW; commercial, 1,138 MW; industrial, 782 MW. RMB Ex. No. 3.3 and BNH Ex. 6.3.

50. The coincident peaks for UP&L were as follows: residential, 19%; commercial, 48%; industrial, 33%. RMB Ex. No. 3.3 and BNH Ex. 6.3.

51. In 1986, the customer class mix would have been 84% residential, 14% commercial, 1% irrigation, and 1% industrial. The energy sales would have been 29% residential, 25% commercial, 3% irrigation, and 43% industrial. BNH Ex. 6.7.

B. Load Diversity.

1. Specific Load Shape Diversity Opportunities Which Exist Between UP&L and PP&L.

52. UP&L has a summer peak while PP&L has a winter peak. In addition there is inter-seasonal diversity. Supp., RMB at 12 and BNH at 13-14.

53. The estimated 1988-89 annual non-coincident peak for PP&L is 4,442 MW and for UP&L it is 2,426 MW. The diversity between the non-coincident annual peak and the non-coincident winter peak is 249 MW. The coincident peak for the combined companies is 6,542 MW. The difference between the coincident peak and the non-coincident annual peak (6,868 MW) is 326 MW. RMB Ex. 3.6 and BNH Ex. 6.6.

54. In 1986, the net diversity at the time of the combined peak was 393 MW. This net diversity is composed of 373 MW of seasonal diversity and 20 MW of hourly diversity (UP&L's loads tend to come earlier in the day because of the time zone difference). BNH at 17 and 19 and BNH Ex. 6.5.

55. The seasonal diversities in the peak month have been increasing in the past 4 years due to an increase in

UP&L's summer load over its winter load in those years. The hourly diversities tend to vary widely from year to year, but there do not appear to be any significant yearly trends. BNH at 17.

56. The forecasted annual peak load diversity for UP&L and PP&L for 1988-89 is as follows: UP&L July peak--2,426 MW capacity; PP&L winter peak--4,442 MW; non-coincident peak--6,868 MW; coincident annual peak--6,542 MW; annual peak load diversity--326 MW capacity. In 2,006-07, the annual peak load diversities forecast is: UP&L July peak--3,535 MW; PP&L winter peak--5,796 MW; non-coincident peak--9,331 MW; coincident annual peak--8,931 MW; annual peak load diversity--400 MW. RMB Ex. 3.7.

2. Merged Company's Opportunities

57. The combined system would peak in winter; however, this coincident peak would be substantially lower than the sum of the two systems' non-coincident annual peak loads. This annual peak load diversity would be 436 MW, based on 1986 actual loads. RMB at 10; RMB EX. 3.1, Fig. 3.6.

58. As merged utilities, the combined system peak load is reduced by the net diversity which was 393 MW in 1986, and is projected to be in excess of 350 MW in all of the future projected years. BNH at 21.

C. Impact of Industrial/Commercial Self-Generation "Bypass".

59. PP&L believes it can offer customers a superior alternative to self-generation and it endeavors to do so. DFB at 11.

60. To the extent the merger allows the Merged Company to lower its prices further, it will be in a better position to retain customers who may have considered self-generation. DFB at 11.

IV. RESOURCES

A. Current Generation Resources.

1. Current Complement of Generation Resources.

61. UP&L has a generating capability of 3,162 MW derived from thermal plants located in Wyoming and Utah and hydroelectric plants located in Idaho, Utah and Wyoming. Under average water conditions, approximately 3% of UP&L's energy is produced by hydroelectric plants and 86% is produced by coal-fired steam plants. The balance is obtained from geothermal resources, a gas turbine and purchases from other utilities and qualifying facilities. Application at 4.

62. Utah Power & Light's 1988 capacity resource mix consists of: System Hydro (118 MW), Carbon (171 MW), Naughton (710 MW), Huntington (815 MW), Hunter (1,001 MW) and other resources (131 MW), for a total capacity of 2,946 MW. The Carbon, Naughton, Huntington, and Hunter resources are coal-fired thermal resources. RMB Ex. 3.1, Fig. 3.2.

63. UP&L's current coal sources are sufficient to meet any anticipated energy requirements up to the year 2000. RMB Ex. 3.22, n.9.

64. PP&L's 1988 total system resource capability is approximately 5,859 MW, of which 3,073 MW or 52% is from coal-fired resources located in Wyoming (2,325 MW), Washington (608 MW), and Montana (140 MW). RMB at 5; RMB Ex. 3.1.

65. PP&L's present capacity resource mix consists of: BPA Peaking (1,027 MW), Purchased Hydro (583 MW), System Hydro (868 MW), Colstrip (140 MW), Wyodak (248 MW), Centralia (608 MW), Dave Johnston (750 MW), Jim Bridger (1,327 MW), and other resources (308 MW), for a total capacity of 5,859 MW. The Colstrip, Wyodak, Centralia, Dave Johnston, and Jim Bridger resources are coal-fired thermal resources. RMB Ex. 3.1, at 1.

66. PP&L owns or has partial interests in generating plants with a rated of capacity of 4,043 MW, primarily comprised of thermal plants located in Wyoming, Montana, and Washington, and hydroelectric plants located in California, Montana, Oregon, and Washington. Under average water conditions, approximately 66% of PP&L's energy requirements are

supplied by thermal plants and 16% by hydroelectric plants. The balance of approximately 18% is obtained under long-term purchase contracts (principally from hydroelectric facilities), interchange contracts, and other purchase arrangements. Appl. at 4-5.

67. The energy which BPA delivers to PP&L is exchanged for energy which PP&L returns using its coal-fired generating units. RMB at 6.

68. PP&L's hydroelectric facilities are constrained by several factors, including equipment failures, preventative maintenance requirements, precipitation, storage capability, irrigation, recreation, fishery requirements, and the variability of stream flows. RMB at 9.

69. PP&L's thermal power plant ownership is as follows. Dave Johnston: 750 MW; Jim Bridger: 1,327 MW; Centralia: 608 MW; Wyodak: 248 MW; and Colstrip: 140 MW. RMB EX. 3.1, Fig. 3.4.

70. 70% of PP&L's generation comes from coal-fired plants and approximately 30% comes from hydro-electric facilities. PP&L has terminated involvement in nuclear plants except for a 2.5% interest in the Trojan facility. Supp. DFB at 5. [52% of PP&L's 1988 resource capacity is from coal fired resources, 25% from inexpensive hydroelectric plants, and 18% from low-cost purchases from the Bonneville Power Administration. Testimony of Rodney M. Boucher, PSC Hearing TS at 1247.]

2. Each Company's Current Reserve Capacity and Desired Reserve Margins; Dealing With Excess Reserves.

71. PP&L currently plans for peak reserves, during its winter season, of 950 MW, or approximately 19.7 percent of firm system capacity requirements, and 908 MW during the rest of the year. 2 Supp. RMB at 2.

72. UP&L's reserve obligation, consistent with the Intercompany Pool Agreement, is approximately 20 percent of firm system capacity requirements. Accordingly, the operating year reserve requirement for UP&L is 532 MW, with a 484 MW summer peak reserves. 2 Supp. RMB at 3.

73. PP&L presently meets its load following requirements through large base-load coal-fired generating units and, to a lesser extent, hydroelectric generating resources and resources purchased and scheduled from other northwest utilities. However, PP&L's coal-fired resources are not designed nor equipped to respond to large or rapid load changes encountered during actual system operation. Consequently, PP&L's controllable mid-Columbia hydro resources provide the primary system load following services. RMB at 16.

74. UP&L's large coal-fired generating units are designed and equipped with automatic generating control devices and, thus, can provide system load following services. RMB at 16.

B. Expected Future Generation Resources.

1. UP&L's and PP&L's Expected Capacity Expansions and Reliance on Off-System Resources Without Merger.

75. In the absence of the merger, UP&L expects to make off-system purchases to meet future summer peak loads; this would first occur in the summer season of 1990. By 1998 transmission constraints on off-system purchases would require that new generation be installed; UP&L would plan to construct a 62 MW combustion turbine with additional capacity coming from 150 MW coal units. These same coal units would satisfy the need for new energy resources beginning in 2000-1. These purchases and investments are subject to purchases from qualifying facilities under PURPA. 2 Supp. RMB at 9.

76. In the absence of the merger, PP&L's projected energy resource requirements would outpace its existing energy resources by 1993 or 1994. RMB at 13.

77. PP&L's winter peak loads and energy needs require purchases of capacity beginning in 1990. That capacity may be purchased from BPA. Beginning in 1991, however, PP&L's contracts with BPA expire; PP&L, then, will need to replace its current capacity purchases from BPA. While PP&L is exploring a new contract with BPA, it is also exploring purchases from alternative sources. These sources may include: turbine improvements to existing thermal units, withdrawals of energy

from firm sale to Southern California Edison Company, the exercise of options on co-generation of several of PP&L's industrial customers, optional conservation programs, purchases from BPA, and purchases of winter capacity from California utilities and the installation of combustion turbines. 2 Supp. RMB at 10 and RMB EXhibit 3.22, n. 159.

V. IMPACT OF CHANGING RELATIVE ENERGY PRICES.

78. PP&L is seeking higher growth through sales and marketing, economic development, new energy services, and mergers and acquisitions. DFB at 7-8.

79. PP&L's economic development activities include: researching 20 economic areas and identifying industries with the best potential for development in each area; interesting companies in PP&L's service territory and then assisting customers with such things as permits, zoning, and financial backing through non-utility sources. PP&L is also providing "energy services" by providing tailor-made energy systems. DFB at 9-10.

VI. BENEFITS AND COSTS OF MERGER

A. Benefits to this State.

1. UP&L Customers.

80. Prior to the effective date of the merger, the Merged Company intends to file with the Commission its adoption of UP&L's then effective tariff schedules and service contracts as its own for service to customers theretofore served by UP&L. Application at 13.

81. Attached to UP&L's responses to information Request No. 10 and 11 of UMPA, dated November 24, 1987, are true and accurate copies of UP&L's current retail schedule for each jurisdiction, including all schedules and/or riders referenced by said retail schedules. In addition, attached also are UP&L's rate schedules filed with FERC.

2. UP&L Employees.

82. The merger will not adversely affect union relations because UP&L has union contracts which will be honored by the Merged Company. RND at 12.

B. Other Benefits.

83. The Merged Company has agreed that after the merger, UP&L will continue to receive bids from suppliers in accord with its policies and procedures consistent with the judgment of permanent injunction as and against UP&L entered in the matter of the Special Salt Lake County Grand Jury 1986 term as that judgment may be modified. OTC at 22-23.

84. A merger will have no effect on the coal refund in UP&L jurisdictions. OTC at 23.

CERTIFICATE OF SERVICE

I hereby certify that on the 3d day of June, 1988, I served copies of the foregoing Established Facts, by causing the same to be hand-delivered to the following:

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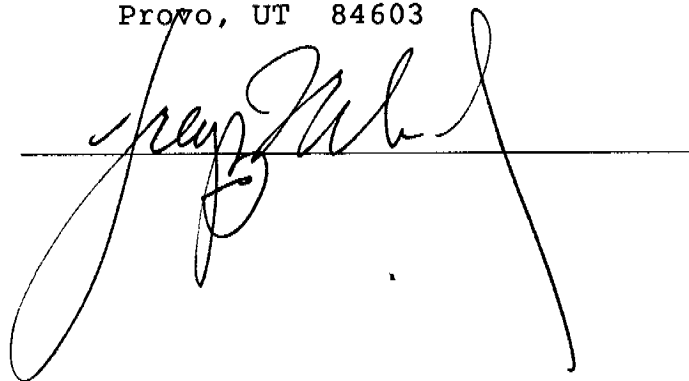
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A handwritten signature in black ink, appearing to read 'Robert J. Grow', is written over a solid horizontal line. The signature is stylized and cursive.

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GIA

ATTACHMENT "A"

1. Application Joint Application for Authorization for a Merger
2. Kennecott's Statement Statement of General Position (Kennecott, etc.) (10-15-87)
3. Coastal States' Statement Statement of Position of Intervenors Coastal States Energy Company, Beaver Creek Coal Company, Cypress Coal Company & Andalex Resources, Inc. (10-15-87)
4. UAMPS' Statement Statement of Position of UAMPS and Washington City (10-15-87)
5. CREDA's Statement CREDA's Statement of Positions & Issues, and Discussion of Groups & Intervention (10-15-87)
6. SLC's Statement Position Statement of Salt Lake City Corporation and Sandy City Corporation (10-15-87)
7. Committee's Statement Position Statement of Committee of Consumer Services (10-15-87)
8. DG&T Statement Position Statement of DG&T (10-15-87)
9. Amax Statement Position Statement of Amax Magnesium Corporation in Support of Its Petition to Intervene (10-16-87)
10. Interrogatory Answers I Answers to Interrogatories (1, 4, 6, 7, 8) (11-11-87)

- 23. BNH Prefiled Testimony of
Bruce N. Hutchinson
(Substituted)
- 24. DFB Prefiled Testimony of
David F. Bolender
(Substituted)
- 25. RMB Prefiled Testimony of
Rodney M. Boucher
(Substituted)
- 26. FDR Prefiled Testimony of
Fredric D. Reed (Substituted)
- 27. Supp. OTC Supplemental to Substituted
Testimony of Orrin T. Colby
- 28. Supp. BNH Supplemental to Substituted
Testimony of Bruce N.
Hutchinson
- 29. Supp. DFB Supplemental to Substituted
Testimony of David F. Bolender
- 30. Supp. FDR Supplemental to Substituted
Testimony of Fredric D. Reed
- 31. Supp. DPS Supplemental to Substituted
Testimony of Dennis P.
Steinberg
- 32. Supp. RMB Supplemental to Substituted
Testimony of Rodney M. Boucher
- 33. 2 Supp. RMB Substituted Second
Supplemental Testimony of
Rodney M. Boucher
- 34. 2 Supp. SRF Substituted Second
Supplemental Testimony of
Shelley R. Faigle
- 35. 2 Supp. BNH Substituted Second
Supplemental Testimony of
Bruce N. Hutchinson

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| 11. | Division Response I | Responses to Data Requests
(Division's First Set)
(11-18-87) (UP&L) |
| 12. | Division Response II | Responses to Second Set of
Data Requests of Division of
Public Utilities (11-20-87) |
| 13. | Division Response III | Responses to Third Set of
Data Requests of Division
(11-25-87) |
| 14. | Division Response IV | Responses to Fourth Set of
Data Requests of Division
(11-30-87) |
| 15. | UAMPS Responses I | Answers to Requests (UAMPS
First Set; 1-134 & 15-29)
(12-15-87) |
| 16. | UMPA Responses I | Answer to Requests (UMPA
First--#14) (12-16-87) |
| 17. | Division Response V | Responses to Fifth Set of
Data Requests of Division
(69-74) (12-17-87) |
| 18. | UMPA Responses II | Answer to Request (UMPA's
Second--1, 3-7, 9, 12-22)
(12-23-87) |
| 19. | Division Response VI | Responses to Fifth Set of
Data Requests of Division
(53-68) (12-28-87) |
| 20. | Kennecott Responses I | Answers to Requests of
Intervenor Kennecott, et al.
(12-28-87) (First Set #1-7,
11, 14-15, 18-19, 21-27) |
| 21. | OTC | Prefiled Testimony of
Orrin T. Colby (Substituted) |
| 22. | FND | Prefiled Testimony of
Frank N. Davis (Substituted) |

36. 3 Supp. FDR Substituted Third Supplemental Testimony of Fredric D. Reed
37. 3 Supp. DPS Substituted Third Supplemental Testimony of Dennis P. Steinberg
38. Response to Interrogatory No. UII1-14, of the Division of Public Utilities First Set of Interrogatories
39. Response to Information Request by Kennecott corporation First Set of Interrogatories, Interrogatory No. 16
40. UP&L's Answers to Request No. 5 of the First Request for the Committee of Consumer Services, January 16, 1988
41. UP&L's Response to Information Request No. 10 and 11 of Utah Municipal Power Agencies dated November 24, 1986, Response dated December 22, 1987
42. Responses to Data Requests of the Public Utilities dated October 9, 1987, Response No. 7, Response Date November 18, 1988
43. Responses to Data Requests of the Public Utilities dated October 9, 1987, Response No. 9, Response Date November 18, 1988

44. Responses to Data Requests of the Public Utilities dated October 9, 1987, Response No. 9, Response Date November 18, 1988
45. Response to Request No. 80 of the Second Committee of Consumer Services Request, Response dated January 14, 1988
46. UP&L's response to Technical Conference Request, Division of Public Utilities Request No. 5