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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICA-	:	
TION OF UTAH POWER & LIGHT	:	
COMPANY, AND PC/UP&L MERGING	:	
CORP. (TO BE RENAMED	:	APPLICANTS' RESPONSE
PACIFICORP) FOR AN ORDER	:	TO AMENDED PROPOSED
AUTHORIZING THE MERGER OF UTAH	:	LIST OF STIPULATED FACTS
POWER & LIGHT COMPANY AND	:	
PACIFICORP INTO PC/UP&L MERGING	:	
CORP. AND AUTHORIZING THE	:	
ISSUANCE OF SECURITIES, ADOPTION	:	Case No. 87-035-27
OF TARIFFS, AND TRANSFER OF	:	
CERTIFICATES OF PUBLIC CON-	:	
VENIENCE AND NECESSITY AND	:	
AUTHORITIES IN CONNECTION	:	
THEREWITH.	:	

Applicants Utah Power & Light Company and PC/UP&L Merging Corp. hereby respond to the Amended Proposed List of Stipulated

Facts of the Utility Shareholder Association of Utah ("Shareholders") dated April 13, 1988.

Based upon the Shareholders' Petition for Order of Stipulation of Agreed and Disputed Facts dated February 17, 1988, the Commission's Order for Stipulation of Agreed and Disputed Facts issued February 26, 1988, and the Commission's Order on this subject dated March 31, 1988, Applicants understand that the purpose of this exercise is for the parties to attempt to reach agreement on certain basic facts in order to avoid the presentation of evidence on matters not in dispute in the interests of administrative economy and expedition of proceedings.

All of the Shareholders' proposed stipulated facts are derived directly from the application, testimony or answers to discovery requests prepared by Applicants, and Applicants do not dispute them. Applicants believe that identification of disputed issues should be left to intervenors. In any event, Applicant's have only received the testimony of the intervenors within the past few days, have not yet received the testimony of the Committee of Consumer Services, and are still reviewing such testimony to determine relevant issues as to which a good faith dispute exists.

Applicants will continue to refine the proposed list of stipulated facts and to develop a list of relevant, disputed facts

in preparation for the conference between the parties which is proposed under the Commission's February 26, 1988 and March 31, 1988 orders.

DATED this 15th day of April, 1988.

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Applicants' Response to Amended Proposed List of Stipulated Facts upon the persons identified in Appendix A attached hereto by mailing a copy thereof, properly addressed and with sufficient postage pre-paid, this 15th day of April, 1988.

Gregory B. Monson

APPENDIX A

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