

Richard W. Giauque, Esq.
Gregory P. Williams, Esq.
Gary F. Bendinger, Esq.
Carol Clawson, Esq.
GIAUQUE, WILLIAMS, WILCOX & BENDINGER
500 Kearns Building
Salt Lake City, Utah 84101
Telephone: (801) 533-8383

\*88 APR 15 P4:41

UTAR PUBLIC SERVICE COMMISSION

Attorneys for Intervenors Coastal States Energy Company and Andalex Resources, Inc.

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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

Coastal States Energy Company and Andalex Resources,
Inc. (the "Utah Independent Coal Companies") hereby respond to
the Utility Shareholders Association of Utah's "Amended Proposed
List of Stipulated Facts" as required by the Commission's Order
of March 31, 1988.

The Shareholders' Amended Proposed List, like the original Proposed List contains numerous self-serving statements and conclusions. It would unfairly burden the Utah Independent Coal Companies to require them to give detailed comments on each

Them, particularly given the limited scope of the issues to be addressed by the coal companies. Nevertheless, the Utah Independent Coal Companies will use their best efforts to reach agreement as to those facts of concern to them by April 29, 1988, as ordered by the Commission.

RESPECTFULLY SUBMITTED this 15th day of April, 1988.

GIAUQUE, WILLIAMS,
WILCOX & BENDINGER
500 Kearns Bldg.
Salt Lake City, Utah 84101
Telephone: (801) 533-8383

Gregory P. Williams

Attorneys for Intervenors Coastal States Energy Company and Andalex Resources, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the persons shown on Exhibit A by mailing a copy thereof, properly addressed and postage prepaid.

DATED at Salt Lake City, Utah, this 15th day of April, 1988.

Shiri S. Wittyman

## EXHIBIT A

Sidney G. Baucom, Esq. Thomas W. Forsgren, Esq. Edward A. Hunter, Jr. Utah Power & Light Company 1407 West North Temple Salt Lake City, Utah 84140

George M. Galloway, Esq. Stoel Rives Boley Jones & Grey (PC/UP&L Merging Corp.) Suite 2300 900 S.W. Fifth Avenue Portland, Oregon 97204

Dale A. Kimball, Esq.
Gary A. Dodge, Esq.
Kimball, Parr, Crockett & Waddoups
(UMPA, BMT)
185 South State, Suite 1300
P.O. Box 11019
Salt Lake City, Utah 84147

Donald R. Allen, Esq.
John P. Williams, Esq.
Duncan, Allen & Mitchell
(UMPA)
1575 Eye Street, N.W.
Washington, D.C. 20005

F. Robert Reeder, Esq.
Val R. Antczak, Esq.
Parsons, Behle & Latimer
(Kennecott Copper Corporation, et al.)
185 South State, Suite 700
P.O. Box 11898
Salt Lake City, Utah 84147-0898

Robert S. Campbell, Jr. Gregory B. Monson, Esq. Watkiss & Campbell (PC/UP&L Merging Corp.) 310 South Main, Suite 1200 Salt Lake City, Utah 84101

Donald B. Holbrook, Esq.
Calvin L. Rampton, Esq.
Ronald J. Ockey, Esq.
L. R. Curtis, Jr.
Jones, Waldo, Holbrook & McDonough
(Utility Shareholders Association of Utah)
1500 First Interstate Plaza
Salt Lake City, Utah 84101

Raymond W. Gee, Esq. Kirton, McConkie & Bushnell (Utah Farm Bureau Federation) 330 South 3rd East Salt Lake City, Utah 84111

A. Wally Sandack, Esq. (UMWA District 22) 370 East Fifth South Salt Lake City, Utah 84111

James A. Holtkamp, Esq.
(UAMPS)
Van Cott, Bagley, Cornwall
& McCarthy
50 South Main St., Suite 1600
Salt Lake City, Utah 84144

Michael Ginsberg, Esq. Division of Public Utilities Assistant Attorney General 130 State Capitol Building Salt Lake City, Utah 84114

Sandy Mooy, Esq. Committee of Consumer Services Assistant Attorney General 124 State Capitol Building Salt Lake City, Utah 84114

F. Elgin Ward Lynn W. Mitton Deseret Generation & Transmission 8722 South 300 West Sandy, Utah 84070

Robert Wall, Esq. Utah Public Power Co-op 2470 South Redwood Road West Valley City, Utah 84119

Michael S. Gilmore, Esq. Idaho Public Utility Commission Deputy Attorney General State House Mail Boise, ID 83720

Rodger Cutler, Esq.
Salt Lake City Attorney
324 South State Street
Salt Lake City, UT 84111

Chris L. Engstrom, Esq. Attorney for Washington City 90 East 200 North P.O. Box 400 St. George, UT 84770

Stephen R. Randle, Esq. Ungricht, Randle & Deamer 520 Boston Building Salt Lake City, UT 84111

Alice Ritter Burns, Esq. Cedar City Corporation P.O. Box 249 Cedar City, UT 84720

Utah Energy Office 3 Triad Center, #450 Salt Lake City, UT 84180-1204

Charles M. Darling, IV
Baker & Botts
(AMAX Magnesium Corp.)
555 13th Street, N.W.
Suite 500 East
Washington, D.C. 20004-1109

Gerald D. Conder Conder and Wangsgard (AMAX Magnesium Corp.) 4059 South 4000 West West Valley City, UT 84120-4099

Mr. Jay Bowcutt, Controller Nucor Steel/Utah Division P.O. Box 488 Plymouth, UT 84330

Andrew W. Buffmire, Esq. William P. Schwartz, Esq. Hansen & Anderson 50 West Broadway, Suite 600 Salt Lake City, Utah 84101

Peter J.P. Brickfield, Esq. Kenneth G. Hurwitz, Esq. Ritts, Brickfield & Kaufman Watergate Six Hundred Bldg., Suite 915 600 New Hampshire, N.W. Washington, D.C. 20037

Robert J. Grow, Esq. Basic Manufacturing and Technologies of Utah, Inc. P.O. Box 2500 Provo, Utah 84603