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Basic Manufacturing and
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION)	
OF UTAH POWER & LIGHT COMPANY,)	BASIC MANUFACTURING
AND PC/UP&L MERGING CORP. (TO BE)	& TECHNOLOGIES OF
RENAMED PACIFICORP) FOR AN ORDER)	UTAH, INC.'S RESPONSE
AUTHORIZING THE MERGER OF UTAH)	TO APPLICANTS'
POWER & LIGHT COMPANY AND)	INTERROGATORIES AND
PACIFCORP INTO PC/UP&L MERGING)	REQUESTS FOR PRODUCTION
CORP. AND AUTHORIZING THE ISSUANCE)	OF DOCUMENTS
OF SECURITIES, ADOPTION OF TARIFFS,)	
AND TRANSFER OF CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	CASE NO. 87-035-37
AND AUTHORITIES IN CONNECTION)	
THEREWITH.)	

Intervenor Basic Manufacturing & Technologies of Utah, Inc. (hereafter "Basic Manufacturing") hereby submits the following responses to Applicants' Interrogatories and Requests for Production of Documents in the above-captioned proceeding.

GENERAL OBJECTION

Basic Manufacturing objects to the instructions of the Applicants, including the continuing nature of the requests, to the extent that they request privileged information or exceed the scope of discovery permissible under the procedural rules governing these proceedings, including the Utah Rules of Civil Procedure.

INTERROGATORIES

1. With respect to each expert with whom you have consulted or whom you have retained in connection with any of the issues in this proceeding, state the following:

- (a) The identify of such expert;
- (b) The date such expert was retained;
- (c) His address;
- (d) His area of purported expertise;
- (e) His educational background, formal training and experience in his area of purported expertise;
- (f) His present employment and his employment for each of the preceding ten years;
- (g) A list of all other cases in which such expert has been consulted, retained or testified as an expert including:
 - (i) State or jurisdiction;
 - (ii) Court of administrative agency;
 - (iii) Case or docket number;
 - (iv) Brief description of case;
 - (v) In whose behalf was expert retained;
 - (vi) Date of appearance.

RESPONSE: Basic Manufacturing objects to this interrogatory on the grounds that it requests information constituting attorney work-product beyond the scope of

permissible discovery under Rule 26(b)(4) of the Utah Rules of Civil Procedure. Basic Manufacturing further objects to this interrogatory on the grounds that it is premature. Basic Manufacturing is currently in the process of interviewing potential experts, defining its position and developing its testimony for these proceedings. The identity, qualifications and positions of any experts retained by Basic Manufacturing to testify in this matter will be revealed in accordance with the Scheduling Order adopted by the Commission in these proceedings.

2. Identify all witnesses, expert or otherwise, you intend to call in this proceeding.

RESPONSE: See response to Interrogatory No. 1. At the present time, Basic Manufacturing has not yet determined which witnesses, if any, it will call in these proceedings. The identity and testimony of any such witness or witnesses will be revealed in accordance with the time schedule adopted by the Commission.

3. With respect to each witness you have identified in your answer to Interrogatory No. 2, state:

(a) The issues in this proceeding of which he has knowledge;

(b) The manner in which he obtained such knowledge, i.e., eyewitness, participant, investigator, employee, etc.;

(c) Identify any written or recorded statements or reports received from him by you, or your counsel, agent or employee; and

(d) State which issues in this proceeding the witness' testimony will address and briefly state his position on those issues.

RESPONSE: See response to Interrogatory No. 2.

4. For each witness identified in your answer to Interrogatory No. 3, please identify all documents considered or relied upon by the witness including, but not limited to, all computer programs which have been used, or are currently being used, to analyze the proposed merger.

RESPONSE: See responses to Interrogatory Nos. 2 and 3.

5. For each expert identified in your answer to Interrogatory No. 1 that you will not call as a witness in this proceeding, please identify all documents prepared or relied upon by the expert in connection with any of the issues in this proceeding.

RESPONSE: See objections and response to Interrogatory No. 1. This interrogatory requests material beyond the scope of permissible discovery under Rule 26(b)(4) of the Utah Rules of Civil Procedure.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents identified in answers to the foregoing interrogatories.

RESPONSE: See Basic Manufacturing's responses to the foregoing Interrogatories.

DATED this 11th day of March, 1988.



ROBERT J. GROW, Esq.
General Counsel,
Basic Manufacturing &
Technologies Utah, 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 11th day of March, 1988.

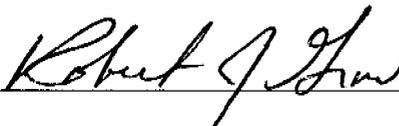


EXHIBIT A

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