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'88 MAR -6 P.M.

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SERVICED

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

* * * * *

IN THE MATTER OF THE)	KENNECOTT CORPORATION,
APPLICATION OF UTAH POWER &)	<u>ET AL.</u> 'S OBJECTIONS,
LIGHT COMPANY, AND PC/UP&L)	ANSWERS TO INTERROGATORIES
MERGER CORP. (TO BE RENAMED)	AND RESPONSES TO REQUEST
PACIFICORP) FOR AN ORDER)	FOR PRODUCTION OF DOCUMENTS
AUTHORIZING THE MERGER OF)	
UTAH POWER & LIGHT COMPANY AND)	
PACIFICORP INTO PC/UP&L MERGER)	
CORP. AND AUTHORIZING THE)	
ISSUANCE OF SECURITIES,)	
ADOPTION OF TARIFFS, AND)	
TRANSFER OF CERTIFICATES OF)	Case No. 87-035-27
PUBLIC CONVENIENCE AND)	
NECESSITY AND AUTHORITIES)	
IN CONNECTION THEREWITH.)	

* * * * *

Kennecott et al. objects, answers and responds to applicants' Interrogatories and Requests for Production of documents as follows:

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 or administrative agency;
 - (iii) Case or docket number;
 - (iv) Brief description of case;
 - (v) In whose behalf was expert retained;
 - (vi) Date of appearance.

ANSWER: Kennecott et al. objects to this interrogatory on the basis that experts retained with respect to issues which are or may be the subject of this application, but who will not be called as a witness, are protected as attorney work product and the existence, identify and subject matter which any such expert examined are not discoverable. Without waiving the foregoing objection, Kennecott et al. has retained Maurice Brubaker and James Ross and will provide the requested information if prefiled testimony is filed by either.

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

ANSWER: Kennecott et al. may presently call either Maurice Brubaker or James Ross as witnesses. Final decisions concerning other or different witnesses have not been made.

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.

ANSWER: No final decisions have been made concerning the scope or content of any testimony which may be filed. Such final decisions will be embodied in prefiled testimony to be filed prior to hearings in this matter.

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.

ANSWER: Supporting workpapers will be filed with any prefiled testimony filed on behalf of these Kennecott et al.

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.

ANSWER: Kennecott et al. objects to this interrogatory on the basis set forth in the answer to Interrogatory No. 1.

REQUEST FOR PRODUCTION OF DOCUMENTS

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

RESPONSE: See foregoing answers to interrogatories.

DATED this 7th day of March, 1988.



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of and for
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'88 MAR -8 P.M.

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SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

* * * * *

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

* * * * *

I hereby certify that I delivered a true and correct copy of the foregoing KENNECOTT CORPORATION, ET AL'S OBJECTIONS, ANSWERS TO INTERROGATORIES AND RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS to the following by placing the same in the United States Mail, postage prepaid on this 7th day of March, 1988.

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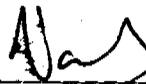
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DATED this 7th day of March, 1988.



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