

20 FEB 22 10:44

Peter J.P. Brickfield, Esq.
Kenneth G. Hurwitz, Esq.
RITTS, BRICKFIELD & KAUFMAN
Watergate 600 Building, Suite 915
600 New Hampshire Avenue, N.W.
Washington, D.C. 20037
Telephone: (202) 342-0800

Andrew W. Buffmire, Esq.
William P. Schwartz, Esq.
HANSEN & ANDERSON
Valley Tower Building, Suite 600
50 West Broadway
Salt Lake City, Utah 84101
Telephone: (801) 532-7520

Attorneys for Nucor Steel

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 PACIFICORP) for an)
Order Authorizing the Merger of)
UTAH POWER & LIGHT COMPANY and)
PACIFICORP into PC/UP&L MERGING)
CORP. Authorizing the Issuance)
of Securities, Adoption of Tariffs)
and Transfer of Certificates of)
Public Convenience and Necessity)
and Authorities in Connection)
Therewith.)

Case No. 87-035-27

**FIRST FORMAL DATA REQUEST OF
NUCOR STEEL TO APPLICANTS
UTAH POWER & LIGHT COMPANY,
PACIFICORP AND PC/UP&L
MERGING CORPORATION**

Nucor Steel, a division of Nucor Corporation (hereinafter referred to as "Nucor") hereby submits the following Data Request ("Request") to Utah Power & Light Company ("UP&L"), PacifiCorp and PC/UP&L Merging Corporation (hereinafter collectively referred to as "Applicants") in the above-referenced docket.

INSTRUCTIONS

1. In answering each Request, please state the text of the Request prior to providing the response. Each Request and applicable response should be on a separate page. Where there are subparts to a Request, each subpart and applicable response should be on a separate page. Each Request is continuing in nature. Thus, if the Applicants acquire or discover additional or different information with respect to a Request after the Request has been initially answered, the Applicants are required to supplement their response immediately following the receipt of such additional or different information, giving the additional or different information to the same extent as originally requested.

2. To the extent that the Applicants assert that any documents or communications requested herein are privileged, the Applicants should state the basis for the privilege and provide any non-privileged information. If the assertion is that such documents are subject to a Protective Order or other ruling, order or authority not part of the docket in this proceeding, they should furnish a copy of that ruling, order or authority.

3. To the extent that the Applicants assert that any requested information is not relevant or not material to any issue in the above-captioned matter, the Applicants, in their written response thereto, should indicate a specific basis for said assertion in the context of any issues arising in this proceeding.

4. In the event the Applicants assert that any requested information is not available in the form requested, the Applicants, in their written response thereto, should disclose the following:

- (a) the form in which the requested data currently exists (identifying documents by title);
- (b) whether it is possible under any circumstances for the Applicants to provide the data in the form requested;
- (c) the procedures or calculations necessary to provide the data in the form requested;
- (d) the length of time (in hours or days) necessary for the Applicants to prepare the data in the form requested; and
- (e) the earliest dates, time period, and location that representatives of Nucor may inspect the Applicants' files, records or documents in which the requested information currently exists.

5. The Requests contained herein contemplate that individual copies of any documentary material requested will be provided to Nucor as is the usual custom before the Commission. In the event that the Applicants assert that any requested documents are voluminous, or, for some other reason, that copies cannot be provided, the Applicants will make this documentary material available for inspection and copying at a reasonable time and in a reasonable manner to be agreed upon by counsel for the Applicants and counsel for Nucor.

6. In providing documents, the Applicants are requested to furnish all documents or items in their physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of the Applicants or any of the Applicants' employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise. If obtaining a document from such

third person requires securing a subpoena, then the Applicants shall not be required to supply the requested document. Instead, the Applicants shall state that the requested document cannot be supplied because it is held by a person who refuses to supply it absent a lawful subpoena.

7. To the extent any requested document cannot be provided in full, it shall be provided to the extent possible, with an indication of the document or portion thereof which is being withheld and the reasons for withholding the document.

8. All documents shall be provided in the same order as they are kept or maintained by the Applicants. To the extent they are attached to each other, documents should not be separated.

9. Documents not otherwise responsive to this Request shall be provided if they constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar materials.

10. Provide the name and title of the person or persons answering each Request.

11. "Applicants" refers collectively to Utah Power & Light Company, PacifiCorp, and PC/UP&L Merging Corporation.

12. "You," "your," or "your company" refers to the Applicants, their subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in their behalf.

13. "Identify" or "state the identity of" means as follows:

- (a) when used in reference to an individual, to state his full name and present or last known residence address and telephone number, his present or last known position and

business affiliation, and his position and business affiliation at the time in question;

- (b) when used in reference to a commercial or governmental entity, to state its full name, type of entity (e.g., corporation, partnership, single proprietorship), and its present or last known address; and
- (c) when used in reference to a document, to state the date, author, title, and type of document (e.g., letter, memorandum, photograph, tape recording, etc.).

14. The term "document" as used in the Requests contained herein is used in its customary broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. A Request seeking the identification or production of documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or provided; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification and production.

15. "Communication" shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, and personal conversations.

16. Words expressing the singular number shall be deemed to express the plural number; those expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.

17. The unqualified term "or" shall be construed either conjunctively or disjunctively to bring within the scope of these Requests any matters that might otherwise be construed to be outside their scope.

18. The unqualified term "person" shall mean an individual, corporation, partnership, unincorporated association or other business or governmental entity.

19. Unless otherwise indicated in the specific Request, the following Requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 1980, through and including the date of your response.

20. Where these Requests seek quantitative or computational information (e.g., models, analyses, databases, formulas) stored by the Applicants or their consultants in machine-readable form, in addition to providing hard copy, the Applicants are requested to furnish such machine-readable information, in order of preference:

- (a) as Lotus 1-2-3[®] worksheet files on floppy diskettes (DS/DD) for IBM PC compatibles;
- (b) as other IBM PC compatible worksheet or database floppy diskette files;
- (c) as ASCII text floppy diskette files;

- (d) as magnetic tape files readable by DEC-20 TOPS operating system; or
- (e) as such other magnetic media files as the Applicants may use.

Nucor does not require the creation of machine-readable information, but rather requests such machine-readable information only if and where the information is already stored in machine-readable form.

21. Responses to any of these Requests may include incorporation by reference to responses to other Requests only if the entirety of the referenced response is to be incorporated, or the specific information or documents of the referenced response are expressly identified.

22. Nucor requests that the Applicants send their responses to this Request to the following:

Peter J.P. Brickfield
Kenneth G. Hurwitz
Ritts, Brickfield & Kaufman
Watergate 600 Building
Suite 915
Washington, D.C. 20037-2474

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

DATA REQUESTS

1. Identify and provide copies of all studies or other documents that relate to the impact of the proposed merger on the frequency and duration of service interruptions for UP&L's current interruptible customers.

2. (a) Do the Applicants propose that existing special contracts between large industrial customers and UP&L will be assigned to the merged entity or to the UP&L operating division of the new merged entity?
- (b) Will conditions in current UP&L contracts that permit interruptions be defined by those conditions on the integrated merged system or by those conditions for the UP&L operating division?
- (c) Will the "average incremental costs of discreet blocks of load," referenced in an existing UP&L special contract with Nucor, be defined by the incremental cost of the integrated merged system, or by the incremental cost on the UP&L operating division? If the latter, define how this calculation will be made given system-wide economic dispatch.

3. This data request seeks information regarding the comparison between load dispatch procedures pre-merger and post-merger. Identify and provide the following documents prepared by or on behalf of UP&L since January 1, 1983 or which were in effect in whole or in part since January 1, 1983:

- (a) each document containing or discussing load dispatch procedures including, without limitation, the instruction or procedure manual used by UP&L's load dispatch operators and each amendment or alteration to such instruction or procedure manual;
- (b) each document containing or discussing UP&L's procedures for interrupting interruptible load, including, without

limitation, each document that sets forth or discusses the order in which such interruptions are to occur; and

- (c) each document containing or discussing the UP&L methodology or policy for setting the order of interruption of interruptible customers, including each report or study relating to the order of interruptions.

4. This data request seeks information regarding the comparison between load dispatch procedures pre-merger and post-merger. Identify and provide each report or study that refers or relates to changes in load dispatch procedures that will affect the frequency or duration of service interruptions or interruptible customers after the consummation of the proposed merger.

5. What will be the merged company's policy toward permitting reductions in firm load by special contract industrial customers after the consummation of the proposed merger?

6. What will be the merged company's policy toward permitting increases in interruptible load by special contract industrial customers after the consummation of the proposed merger?

7. Assume that a special contract governs the service taken by an industrial customer after the consummation of the proposed merger and that such contract provides that demand reductions are not permitted unless a firm sale can be made to "another customer":

- (a) State how the term "another customer" will be interpreted after the consummation of the proposed merger;
- (b) State whether "another customer" could be a retail customer of UP&L located outside of Utah;

- (c) State whether "another customer" could be a retail customer of PP&L;
- (d) Name all states in which "another customer" could be located; and
- (e) State whether "another customer" could be a firm wholesale customer of UP&L, PP&L or the merged company.

8. Identify and provide each document that refers or relates to the policies of the merged company regarding firm load reductions and firm load substitutions of special contract industrial customers after the consummation of the proposed merger.

9. Identify and provide each document prepared by or on behalf of PP&L since January 1, 1983 or which were in effect in whole or in part since January 1, 1983 that relates to firm load reductions and firm load substitutions of or for contract demand customers on the PP&L system.

10. This data request seeks information regarding the comparison between service to Nucor and other industrial customers of UP&L pre-merger and post-merger. Referring to the provision in an existing Nucor contract which permits Nucor to reduce its Firm Contract Demand "contingent upon Company's (UP&L's) ability to sell Customer's (Nucor's) requested reduction in Firm Power to another Utah customer":

- (a) Explain why this provision requires that the sale be made to another customer located in Utah and not to customers located in other states;

- (b) State whether such sale could be made to a firm wholesale for resale customer located in Utah and provide an explanation for your response;
- (c) State whether such sale could be made to a firm wholesale for resale customer located outside of Utah and provide an explanation for your response;
- (d) State whether an increase in firm retail load on the UP&L system, as opposed to a discreet increase in the firm load of an individual customer, would constitute a sale and provide an explanation for your response; and
- (e) State whether an increase in firm wholesale load on the UP&L system, as opposed to a discreet increase in the firm load of an individual customer, would constitute a sale and provide an explanation for your response.

11. This data request seeks information regarding the comparison between service to Nucor and other industrial customers of UP&L pre-merger and post-merger. Refer to Data Request number 10. Please explain how the phrase "contingent upon Company's ability to sell Customer's requested reduction in Firm Power to another Utah customer": will be interpreted by the merged company in relation to each of the subparts (a) through (e) after the consummation of the proposed merger. Indicate whether and to what extent a substitute firm retail or wholesale sale could be made by PP&L to offset a reduction in firm load under the referenced contract provision.

12. This data request seeks information regarding the comparison between service to Nucor and other industrial customers of UP&L pre-merger and

post-merger. Referring to the contract provision set forth in Data Request No. 10, in how many other currently-effective interruptible industrial contracts of UP&L does such a provision exist?

13. Identify and provide each document that discusses, refers or relates to each determination or policy that the sum total of interruptible load on the pre-merger UP&L system or the post-merger system of the Applicants shall not exceed a maximum amount or other upward limitation in the form of a percentage of total load or in some other form.

14. State whether it is the present policy of UP&L that there is an upward limit on the sum total of interruptible load or the number of interruptible customers on the UP&L system and further state whether any such limitations are being considered by the merged company?

15. This Data Request relates to the fact that there are currently no interruptible customers on the PP&L system.

(a) Why are there no interruptible customers on the PP&L system?

(b) Is there a PP&L policy against having interruptible customers?

(c) Identify and provide each document relating to your response to subparts (a) and (b).

16. For each of the last five years, what proportion does interruptible load on the UP&L system comprise with respect to:

(a) annual average total load on the UP&L system; and

(b) annual system peak load on the UP&L system.

17. Please provide a schedule which shows the relative order of priority of interruption among the following types of customers after the consummation of the proposed merger:

- (a) interruptible customers on the UP&L system;
- (b) wholesale for resale customers purchasing non-firm capacity from PP&L;
- (c) wholesale for resale customers purchasing non-firm capacity from UP&L;
- (d) wholesale for resale customers purchasing firm energy from PP&L; and
- (e) wholesale for resale customers purchasing firm energy from UP&L.

18. Identify and provide each document that relates to the plans or intentions of the merged company with regard to the priority of interruption among the customers referenced in subparts (a) through (e) of Data Request number 17.

19. Please provide a schedule which shows the relative order of priority of interruption among the following types of customers on the UP&L system:

- (a) interruptible customers on the UP&L system;
- (b) wholesale for resale customers purchasing non-firm capacity from UP&L;
- (c) wholesale for resale customers purchasing firm energy from UP&L.

20. Identify and provide each document prepared by or on behalf of UP&L since January 1, 1983 or which was in effect in whole or in part since January 1, 1983 that relates to the priority of interruption among the customers referenced in subparts (a) through (c) of the Data Request number 19.

21. Please provide a listing of each firm retail or firm wholesale customer currently being served by PP&L whose contract demand equals or exceeds 10 megawatts and for each such customer state the contract demand and the length of time such customer has been taking service from PP&L. For each such customer, please state the increments of contract demand added for each of the five years preceding the request. To the extent you claim that such information is privileged, please furnish it in a form that does not reveal the identity of specific customers.

22. What will be the impact of merger on the ability of the merged company to reduce the firm and increase the interruptible contract demands of industrial contract customers? Identify and provide each document that discusses such impact of the merger.

23. Explain whether and to what extent the capacity constraint on the Naughton-Ben Lomond transmission line which is anticipated as a result of the proposed merger will affect the frequency and duration of interruptions of interruptible customers served by lines directly interconnected with the 345 KV line north of Ben Lomond.

24. State whether you would object to the introduction into evidence in this proceeding any response of the Applicants to a data request served in the FERC merger proceeding (Docket No. EC88-2-00). If your answer is affirmative,

state what categories of responses or specific responses you would consider objectionable and the basis for your objection.

25. This Data Request relates to peak load forecasts made by UP&L during each of the preceding five years for the purpose of the Company's resource planning. For each such load forecast, state the projected amount of new firm load for each customer class during the relevant planning horizon. If your response is that compiling the requested information would be burdensome, identify and provide the documents from which Nucor could compile the requested information.

26. This Data Request relates to peak load forecasts made by PP&L during each of the preceding five years for the purpose of the Company's resource planning. For each such load forecast, state the projected amount of new firm load for each customer class during the relevant planning horizon. If your response is that compiling the requested information would be burdensome, identify and provide the documents from which Nucor could compile the requested information.

27. This Data Request refers to UP&L's policy of assigning the highest priority of interruption (i.e., the status of first to be interrupted) successively to the newest interruptible customer on the UP&L system.

- (a) State the date such policy was firm implemented by UP&L;
- (b) Explain the rationale for the policy;
- (c) State whether the policy applies to capacity interruptions, to economic cost interruptions or to both; and
- (d) Identify and provide each document that discusses or sets forth the referenced policy.

28. Referring again to the policy described in Data Request number 27:

- (a) state whether or not this will be the policy of the merged company;
- (b) identify and provide each document relating to the intentions or plans of the merged company in regard to the policy; and
- (c) has the policy been considered by the management of PP&L or UP&L in relation to PP&L's economic development program? If your answer is affirmative, summarize the substance of that consideration and identify and provide each document that pertains to it.

29. This Data Request refers to the policy described in Data Request No. 27 and how it applies to contract renewals. As to each of the following examples, specify whether the customer would be considered a new customer or an existing customer for purposes of determining his priority of interruption as a result of renewing his contract (subparts (a) and (b)) or increasing the contract demand amount for interruptible power (subpart (c)):

- (a) the customer has been an interruptible customer for five years and renews his contract for another five year term;
- (b) the customer has been an interruptible customer for five years and renews his contract for another five year term pursuant to an option provision in the contract; and
- (c) the customer has been served for five years with a contract demand for interruptible power of 10 mw and subsequently

increases the contract demand for interruptible power to 80 mw. Is the customer treated as a new customer with respect to the 70 mw additional increment of contract demand or does he retain his former priority of interruption?

30. This Data Request refers to the policy described in Data Request No. 27. Provide a listing showing each interruptible customer currently on the UP&L system, the date each such customer began to take interruptible service, and the interruption priority of such customers. If the interruption priority for any customer does not correspond with its order of coming onto the system, provide a full explanation of the discrepancy and identify and provide each document relating to the order of priority.

31. Do the Applicants know of any customer or other person or entity who has expressed plans or who has plans, to your knowledge, to become an interruptible customer of PP&L contingent upon the consummation of the proposed merger? If you do know of such customers, persons, or entities provide a listing showing the expected interruptible load of each such customer, person, or entity and the anticipated date that the interruptible service will commence.

32. Do the Applicants know of any customer or other person or entity who has expressed plans or who has plans, to your knowledge, to become an interruptible customer of PP&L regardless of whether the merger is consummated? If you do know of such customers, persons, or entities provide a listing showing the expected interruptible load of each such customer, person, or entity and the anticipated date that the interruptible service will commence.

33. Referring to the expressed plans of the merged company to effectuate a 2% retail rate reduction in Utah shortly after the consummation of

the proposed merger, state whether and to what extent the reduction will apply to the following:

- (a) firm service to industrial customers;
- (b) firm service portion of interruptible industrial customers;
and
- (c) interruptible service portion of interruptible industrial customers.

34. Referring to the expressed plans of the merged company to effectuate a 5 to 10% rate reduction (inclusive of the 2% reduction referred to in the previous Data Request), explain how such reduction will be implemented (e.g., through the fuel charge or through reductions in base rates). To the extent such reduction will be implemented through the fuel charge, to what extent will the reduction apply to special contract industrial customers whose energy charges are determined on the basis of system fuel costs?

35. Identify and provide each document which refers or relates to studies or analyses, including the studies or analyses themselves, discussing the impact of the proposed merger on UP&L's service territory or on UP&L's customers.

DATED this 22nd day of February, 1988.

HANSEN & ANDERSON

By William P. Schwartz
Andrew W. Buffmire
William P. Schwartz

RITTS, BRICKFIELD & KAUFMAN

By *Peter Brickfield by Lester Schwartz*
Peter J. P. Brickfield
Kenneth G. Hurwitz

Attorneys for Nucor Steel

MAILING CERTIFICATE

On this 22nd day of February, 1988, I hereby certify that I caused to be mailed, via United States first class mail, postage prepaid, a true and accurate copy of the forgoing FIRST FORMAL DATA REQUEST OF NUCOR STEEL TO APPLICANTS UTAH POWER & LIGHT COMPANY, PACIFICORP AND PC/UP&L MERGING CORPORATION, to the parties listed below:

Thomas W. Forsgren, Esq. (Hand Delivered)
Mr. Sidney G. Baucom
Mr. Edward A. Hunter
UTAH POWER & LIGHT COMPANY
Post Office Box 899
Salt Lake City, Utah 84110

Mr. F. Elgin Ward
Mr. Fredric D. Reed
PACIFIC POWER & LIGHT COMPANY
920 Southwest 6th Avenue
Portland, Oregon 97204

Charles F. McDevitt, Esq.
Suite 200, Park Place
277 North 6th Street
Boise, Idaho 83702

Mr. Westley F. Merrill
109 North Arthur Spaulding Bldg.
Pocatello, Idaho 83204

Dale A. Kimball, Esq.
Gary A. Dodge, Esq.
KIMBALL, PARR, CROCKETT & WADDOUPS
185 South State Street, Suite 1300
Post Office Box 11019
Salt Lake City, Utah 84147

F. Robert Reeder, Esq.
Val R. Antezak, Esq.
PARSONS, BEHLE & LATIMER
185 South State Street, Suite 700
Post Office Box 11898
Salt Lake City, Utah 8147-0898

Donald R. Allen, Esq.
John P. Williams, Esq.
DUNCAN, ALLEN & MITCHELL
1575 Eye Street, N.W.
Washington, D.C. 20005

Mr. Lynn W. Mitton
DESERET GENERATION & TRANSMISSION
8722 South 300 West
Sandy, Utah 84070

Mr. Robert Wall
UTAH PUBLIC POWER CO-OP
2470 South Redwood Road
West Valley City, Utah 84119

Mr. John Morris
LeBOEUF, LAMB, LEIBY & MacRAE
136 South Main Street, Suite 1000
Salt Lake City, Utah 84101

Mr. L. Christian Hauck
COLORADO UTE ELECTRIC ASSOCIATION
Post Office Box 1149
Montrose, Colorado 81402

Ms. Salli Barash
WILLKIE, FARR & GALLAGHER
1 CitiCorp Center
153 East 53rd Street
New York, New York 10022

A. Wally Sandack, Esq.
370 East Fifth South
Salt Lake City, Utah 84111

Robert S. Campbell Jr., Esq. (Hand Delivered)Ms.
Gregory B. Monson, Esq.
WATKISS & CAMPBELL
310 South Main Street, Suite 1200
Salt Lake City, Utah 84101

Calvin L. Rampton, Esq.
JONES, WALDO, HOLBROOK & McDONOUGH
1500 First Interstate Plaza
170 South Main Street
Salt Lake City, Utah 84101

L. R. Curtis Jr., Esq.
JONES, WALDO, HOLBROOK & McDONOUGH
1500 First Interstate Plaza
170 South Main Street
Salt Lake City, Utah 84101

Raymond W. Gee, Esq.
KIRTON, McCONKIE & BUSHNELL
330 South 300 East
Salt Lake City, Utah 84111

Mr. Charles M. Darling IV
Mr. J. Patrick Berry
Ms. Sheryl S. Hendrickson
555 West 13th Street, N.W.
Suite 500 East
Washington, D.C. 20004-1109

Mr. Edwin E. Blaney
SALT LAKE COUNTY COUNCIL
OF GOVERNMENTS
420 West 1500 South, Suite 200
Bountiful, Utah 84010

Ms. Kathryn T. Whalen
BENNETT, HARTMAN, TRAUMAN
& REYNOLDS, P.C.
One S.W. Columbia, Suite 1450
Portland, Oregon 97258

Mr. Robert J. Grow
BASIC MANUFACTURING & TECHNOLOGIES
OF UTAH, INC. dba GENEVA STEEL
Post Office Box 2500
Provo, Utah 84603

Alice Ritter Burns
110 North Main Street
Post Office Box 249
Cedar City, Utah 84720

Mr. Roger Cutler
Salt Lake City Attorney
324 South State Street
Salt Lake City, Utah 84111

Mr. Paul T. Morris
West Valley City Attorney
Mr. I. Robert Wall
Assistant City Attorney
2470 South Redwood Road
West Valley City, Utah 84119

Mr. Chris L. Engstrom
SNOW, NUFFER, ENGSTROM & DRAKE
Post Office Box 400
St. George, Utah 84770

Ms. Myrna J. Walters
Mr. Michael S. Gilmore
Ms. Lori Mann
IDAHO PUBLIC UTILITIES COMMISSION
Statehouse Mail
Boise, Idaho 83720

Mr. Glen J. Ellis
Mr. Dean B. Ellis
60 East 100 South, Suite 200
Post Office Box 1097
Provo, Utah 84603

James S. Jardine, Esq.
RAY, QUINNEY & NEBEKER
Post Office Box 45385
Salt Lake City, Utah 84145-0385

Walter Schwarz