

87 DEC -7 P/18

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH
SERVICE COMMISSION

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.)	FIRST SET OF DATA REQUESTS OF UAMPS AND WASHINGTON CITY TO APPLICANTS
		Case No. 87-035-27

Pursuant to Rule 7.2 of the Commission's Rules of Practice and Procedure, Rule 33 and 34 of the Utah Rules of Civil Procedure and the Scheduling Order entered herein on November 10, 1987, intervenors Utah Associated Municipal Power Systems ("UAMPS") and Washington City ("Washington") hereby file this First Set of Data Requests to Applicants.

DATA REQUEST NO. 1: On August 21, 1987, F.N. Davis of Utah Power & Light Company ("UP&L") sent to Mayor Robert Slack of Washington a letter refusing Washington's request to wheel power and energy from Idaho Power Company to Washington. A photocopy of that letter is attached as Exhibit A to the Statement of Position of Utah Associated Municipal Power Systems and Washington City dated October 15, 1987 in the captioned matter. Please explain the following:

- (a) How will utilization of the northern interconnections between UP&L and PacifiCorp preclude wheeling of power across those interconnections?
- (b) How will the utilization patterns of the northern interconnections change following the merger?
- (c) What detriment will UP&L and its customers suffer should the requested wheeling services be granted?
- (d) What detriment will PacifiCorp and its customers suffer should the requested wheeling services be granted?
- (e) What detriment will the merged company and its customers suffer should the requested wheeling services be granted?
- (f) Under what circumstances would UP&L wheel for another utility on its transmission system?
- (g) Under what circumstances would PacifiCorp wheel for another utility on its transmission system?
- (h) Under what circumstances would the merged company wheel for another utility on its transmission system?

DATA REQUEST NO. 2. Please provide all correspondence, documents, papers and analyses relating to any request by Washington for UP&L to wheel power and energy from Idaho Power Company to Washington.

DATA REQUEST NO. 3: Please state why UP&L's refusal to wheel Idaho Power Company power to Washington does not violate Section 11 of the Option Agreement dated October 20, 1983 between Washington City and UP&L.

DATA REQUEST NO. 4: Please describe any offer or offers by UP&L to Washington or Idaho Power Company of an alternate wheeling path that would have enabled Idaho to deliver power and energy to Washington.

DATA REQUEST NO. 5. Please describe in detail any planned joint scheduling or dispatching of resources utilizing the combined UP&L-PacifiCorp post-merger transmission facilities.

DATA REQUEST NO. 6. Please provide information describing the loading of each of UP&L's northern interconnections during the past five years, including the period of time, date, and time during the day that each interconnection point was fully loaded.

DATA REQUEST NO. 7. Please provide all studies, information, analyses and documents in support of the proposition that the northern UP&L-PacifiCorp interconnections will be fully loaded as a consequence of the joint operation of the systems after the merger.

DATA REQUEST NO. 8. Please describe how phase shifters to be installed in western Colorado by next year by

the Western Area Power Administration will increase the flow on UP&L's northern interconnections.

DATED this 7th day of December, 1987.

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CERTIFICATE OF MAILING

I hereby certify that I caused a true and correct copy of the within and foregoing UAMPS' First Set of Data Requests to Applicant to be hand delivered this 7th day of December, 1987 to the following:

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