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Municipal Power Agency

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) UMPA'S SECOND
RENAMED PACIFICORP) FOR AN ORDER) DATA REQUEST
AUTHORIZING THE MERGER OF UTAH) TO APPLICANTS
POWER & LIGHT COMPANY AND)
PACIFICORP INTO PC/UP&L MERGING)
CORP. AND AUTHORIZING THE ISSUANCE)
OF SECURITIES, ADOPTION OF TARIFFS,) Case No. 87-035-27
AND TRANSFER OF CERTIFICATES OF)
PUBLIC CONVENIENCE AND NECESSITY)
AND AUTHORITIES IN CONNECTION)
THEREWITH.)

Pursuant to Rule 7.2 of the Commission's Rules of Practice and Procedure, Rules 33 and 34 of the Utah Rules of Civil Procedure and the Scheduling Order entered herein on November 10, 1987, intervenor Utah Municipal Power Association

("UMPA") files this Second Data Request to Applicants. Pursuant to Rule 7.3(d) of the Commission's Rules of Practice and Procedure and the discussion among counsel at the November 17, 1987 hearing, Applicants are requested to respond within fourteen (14) days from the date of service of these Requests.

1. Please provide Utah Power and Light's most recent load forecast study for customer classes or functional groups not included in question number 4 of UMPA's Initial Data Requests to Applicants dated November 17, 1987. Such functional groups or customer classes would include those such as interruptible which are not included in a forecast of firm sales.

2. Please provide the following information for each generation plant (for multi-unit plants, specify for each unit) in which Pacific Power and Light has an ownership interest or leases on a long term basis:

- a. time to full load from cold start;
- b. time to full load from hot start;
- c. Maximum ramp rate;

3. Please provide the following information for each generation plant (for multi-unit plants, specify for each unit) in which Utah Power and Light has an ownership interest or leases on a long term basis:

- a. time to full load from cold start;
- b. time to full load from hot start;
- c. Maximum ramp rate;

4. Please provide the following information for each of Pacific Power and Light's Purchase Power Contracts in force or currently filed for approval before any regulatory agency:

- a. minimum energy;
- b. maximum energy (for purchases from hydroelectric resources provide energy available under each historic water condition consistent with planning);

5. Please provide the following information for each of Utah Power and Light's Purchase Power Contracts in force or currently filed for approval before any regulatory agency:

- a. minimum energy;
- b. maximum energy (for purchases from hydroelectric resources provide energy available under each historic water condition consistent with planning);

6. Please provide by specific transmission lines and interconnections:

- a. the transfer capability of Pacific Power and Light for export and for import;
- b. the amount of capability actually used for firm sales and for non-firm sales outside of Pacific Power & Light's service territory; and
- c. the amount of capability actually used for firm purchases and for non-firm purchases from outside of Pacific Power & Light's service territory.

7. Please provide by specific transmission lines and interconnections:

a. the transfer capability of Utah Power and Light for export and for import;

b. the amount of capability actually used for firm sales and for non-firm sales outside of Utah Power & Light's service territory; and

c. the amount of capability actually used for firm purchases and for non-firm purchases from outside of Utah Power & Light's service territory.

8. Please provide copies of Pacific Power & Light Company's current retail rate schedule for each jurisdiction. Include all schedules and/or riders referenced by said retail rate schedules.

9. Please provide copies of all Pacific Power & Light Company's rate schedules on file with the Federal Energy Regulatory Commission.

10. Please provide copies of Utah Power and Light Company's current retail rate schedules for each jurisdiction. Include all schedules and/or riders referenced by said retail rate schedules.

11. Please provide copies of all of Utah Power & Light Company's rate schedules on file with the Federal Energy Regulatory Commission.

12. Please provide for 1986 and 1987 to date a list of Utah Power & Light Company charges related to the Energy Balancing Account by Jurisdiction.

13. What functions will the Utah Power & Light Board have control over after the merger of PP&L and UP&L?

14. Will the current PP&L and UP&L be maintained as separate "profit centers" after the merger?

15. If PP&L and UP&L are operated as separate profit centers after the merger, how will joint overhead costs be allocated to each division?

16. If UP&L and PP&L are operated as separate profit centers after the merger, how will transactions between the two subsidiaries be valued and allocated to the divisions?

17. Provide input files, output files and reports, and program documentation of all existing computer models¹ used or to be used to analyze separately or jointly any of the following for PP&L and UP&L before and after the proposed merger:

(1) power supply costs (i.e., purchased firm and non-firm power expenses, non-firm power sales, fuel, and other variable production expenses);

(2) power flow and losses on the combined

¹ Computer models referenced by this request include those operated on a personal computer using spreadsheet or any other software.

transmission systems and on the systems of affected third parties;

(3) firm and non-firm wheeling expenses paid to third parties;

(4) compensation to third-parties for inadvertent power flows;

(5) operating and planning reserve requirements; and

(6) system stability and power transfers constraints.

18. Please provide copies of all documents, studies, information or responses to questions you have supplied, or have been requested to supply, to the staff of the Utah PSC, to the Division of Public Utilities or to any other parties in response to formal or informal data or information requests in this proceeding.

19. Please provide copies of all documents, studies, information or responses to questions that you have supplied, or have been requested to supply, to the staff of other state regulatory bodies in connection with any state regulatory proceedings relating to the proposed merger between Pacific Power and Light and Utah Power and Light.

20. Please provide copies of all documents, studies, information or responses to questions that you have supplied, or have been requested to supply, to any party or intervenor in any

state regulatory proceedings relating to the proposed merger between Pacific Power and Light and Utah Power and Light.

21. Please provide copies of all documents, studies, information or responses to questions that you have supplied, or have been requested to supply, to the staff of the Federal Energy Regulatory Commission ("FERC") in connection with FERC Docket No. EC 88-2-000.

22. Please provide copies of all documents, studies, information or responses to questions that you have supplied, or have been requested to supply, to any intervenor in connection with FERC Docket No. EC 88-2-000.

DATED this 24th day of November, 1987.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing "UMPA's Second Data Request to Applicants" was mailed, postage prepaid (except where otherwise indicated), this 24th day of November, 1987, to the following:

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