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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. AND AUTHORIZING THE ISSUANCE)
OF SECURITIES, ADOPTION OF TARIFFS,)
AND TRANSFER OF CERTIFICATES OF)
PUBLIC CONVENIENCE AND NECESSITY)
AND AUTHORITIES IN CONNECTION)
THEREWITH.)

UMPA'S INITIAL
DATA REQUESTS
TO APPLICANTS

Case No. 87-035-27

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 these Initial Data Requests 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 Pacific Power and Light's most recent load and resource forecast.

2. Please provide Utah Power and Light's most recent load and resource forecast.

3. Please provide Pacific Power and Light's most recent load forecast study. Indicate by customer class or forecast group the forecast of coincident peak demands, forecast of energy sales, forecast of energy at generation, forecast method, and statistical coefficients associated with said forecasting method.

4. Please provide Utah Power and Light's most recent load forecast study. Indicate by customer class or forecast group the forecast of coincident peak demands, forecast of energy sales, forecast of energy at generation, forecast method, and statistical coefficients associated with said forecasting method.

5. Please provide Pacific Power and Light's most recent load forecast study for customer classes or functional groups not included in question number 3, above. Such functional groups or customer classes would include those such as interruptible which are not included in a forecast of firm sales.

6. Please provide Pacific Power and Light's most recent load forecast study for customer classes or functional groups not included in question number 4, above. Such functional groups or customer classes would include those such as interruptible which are not included in a forecast of firm sales.

7. Please provide the following information for each of Pacific Power and Light's generation plants (for multi-unit plants specify for each unit):

- a. name of plant;
- b. number of units;
- c. fuel type;
- d. boiler type (if steam boiler type plant);
- e. nameplate capacity rating;
- f. capacity utilized for planning purposes;
- g. for joint-ownership plants, respondent's share of plant;
- h. minimum operating level;
- i. minimum operating level due to voltage constraints, spinning reserve requirements, fuel contracts, etc., specifying the reason for the constraints;
- j. incremental heat rate curve;
- k. full load heat rate;
- l. annual scheduled maintenance requirements, specifying the dates and duration of such requirements;

- m. other non-annual maintenance requirements, specifying duration and periodicity;
- n. fuel costs for 1987 and projections;
- o. for coal plants specify the amount of oil or other fuel utilized for flame stabilization;
- p. specify forced outage rate for 1983, 1984, 1985 and 1986;
- q. specify forced outage rate utilized for planning purposes;
- r. date of commercial operation; and
- s. planned retirement date.

8. Please provide the following information for each of Utah Power and Light's generation plants (for multi-unit plants specify for each unit):

- a. name of plant;
- b. number of units;
- c. fuel type;
- d. boiler type (if steam boiler type plant);
- e. nameplate capacity rating;
- f. capacity utilized for planning purposes;
- g. for joint-ownership plants, respondent's share of plant;
- h. minimum operating level;
- i. minimum operating level due to voltage

constraints, spinning reserve requirements, fuel contracts, etc., specifying the reason for the constraints;

j. incremental heat rate curve;

k. full load heat rate;

l. annual scheduled maintenance requirements, specifying the dates and duration of such requirements;

m. other non-annual maintenance requirements, specifying duration and periodicity;

n. fuel costs for 1987 and projections;

o. for coal plants specify the amount of oil or other fuel utilized for flame stabilization;

p. specify forced outage rate for 1983, 1984, 1985 and 1986;

q. specify forced outage rate utilized for planning purposes;

r. date of commercial operation; and

s. planned retirement date.

9. Please provide the following information for each of Pacific Power and Light's Purchase Power Contracts:

a. name of seller;

b. type of purchase (e.g., firm purchase, etc.);

c. FERC rate schedule;

d. minimum delivery capacity;

e. maximum delivery capacity;

f. monthly energy delivered;

- g. delivery transmission path;
- h. wheeling charges; and
- i. purchase rates and charges.

10. Please provide the following information for each of Utah Power and Light's Purchase Power Contracts:

- a. name of seller;
- b. type of purchase (e.g., firm purchase, etc.);
- c. FERC rate schedule;
- d. minimum delivery capacity;
- e. maximum delivery capacity;
- f. monthly energy delivered;
- g. delivery transmission path;
- h. wheeling charges; and
- i. purchase rates and charges.

11. Please provide by specific transmission lines and interconnections the transfer capability of Pacific Power and Light for export and import of firm and non-firm sales outside its service territory.

12. Please provide by specific transmission lines and interconnections the transfer capability of Utah Power and Light for export and import of firm and non-firm sales outside its service territory.

13. Please provide copies of documents showing all Pacific Power and Light's transmission entitlement rights.

Specify the amount of capacity entitlement, contract term and price paid for such entitlement.

14. Please provide copies of documents showing all Utah Power and Light's transmission entitlement rights. Specify the amount of capacity entitlement, contract term and price paid for such entitlement.

15. It has been proposed that upon the merger of Pacific Power and Light/Utah Power and Light, additional transmission interconnections would be constructed between the now existing Pacific Power and Light and Utah Power and Light systems. Specify each such proposed interconnection, its voltage, capacity, interconnection points, and the cost of said addition.

16. Please provide Pacific Power and Light's most recent Section 133 filing under the Public Utilities Regulatory Act of 1978.

17. Please provide Utah Power and Light's most recent Section 133 filing under the Public Utilities Regulatory Act of 1978.

18. Please provide any load and resource forecasts for Pacific Power and Light/Utah Power and Light as a merged system.

19. What affect has the reduction of \$55 million for Utah Power and Light's 1987 operation and maintenance budget had on generation availability and what is the effect of this cut-back on future generation availability and reliability?

20. Please provide by state and customer class the amount of any rate reductions in 1987 for Pacific Power and Light Company customers.

21. Please provide by state and customer class any anticipated reductions in retail rates for Pacific Power and Light in 1988.

22. If the Utah Power and Light and Pacific Power and Light systems are operated as a "single utility basis" please explain how fuel costs will be determined for each of the jurisdictions wherein Pacific Power and Light and Utah Power and Light operate.

23. Please provide a list of competitors, including other utilities as well as federal agencies, with which Pacific Power and Light and Utah Power and Light compete for wholesale power sales.

24. Please provide copies of all documents, studies, information or responses to questions you have supplied 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.

25. Please provide copies of all documents, studies, information or responses to questions that you have supplied 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.

26. Please provide copies of all documents, studies, information or responses to questions that you have supplied 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.

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

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

29. Please identify and provide any analyses, information or studies performed by or for any of the applicants showing or relating to any of the following:

- a. projections of non-firm and firm sales for Pacific Power and Light outside of its service territory for 1987 and beyond. Specify the amount of such sales, projected pricing and contract terms.
- b. projections of non-firm and firm sales for Utah Power and Light outside of its service territory for 1987 and beyond. Specify the amount of such sales, projected pricing and contract terms.
- c. the type of "packaging improvements" for power sales which will be possible through the merger of Pacific Power and Light/Utah Power and Light. Specify contract elements such as flexibility and delivery, system backup, long-term price stability, length of supply obligation and firmness of supply.

- d. transmission line capacity deratings due to loop flow associated with additional transfers between the existing Pacific Power and Light and Utah Power and Light systems.
- e. reductions in spinning reserve requirements resulting from the merger of Utah Power and Light/Pacific Power and Light.
- f. support for the assertion that the consolidation of generation and transmission resources associated with the merger of Pacific Power and Light/Utah Power and Light will postpone the addition of new resources for both companies.
- g. support for the assertion that the consolidation of resources and operations and economies of scale which will result from the merger of Pacific Power and Light/Utah Power and Light will result in future operating savings.
- h. support for assertion that operating savings will be provided due to the merger of Pacific Power and Light/Utah Power and Light associated with unit commitment, consolidation of inventories, increased flexibility in scheduling maintenance of generating plants and shared savings between operating divisions.
- i. support for the assertion that the surviving company, PacifiCorp (Oregon), will be a financially stronger company than either Pacific Power and Light or Utah Power and Light operating as separate companies.
- j. support for the assertion that the merger between Pacific Power and Light/Utah Power and Light will promote economic development in the service areas of the combined company.
- k. support for the assertion that Utah Power and Light rates will be decreased from 5% to 10% over the next four years.

- l. support for the assertion that Pacific Power and Light's economic development programs have helped to retain or create 2,500 jobs in its service territory.
- m. support for the assertion that the merger between Pacific Power and Light/Utah Power and Light will increase firm and non-firm access to existing and new wholesale power markets, facilitating the probable disposition of available power supplies.
- n. support for the assertion that the merger between Pacific Power and Light/Utah Power and Light will enhance both companies' ability through expanding interconnections to take greater advantage of low-cost power supplies.
- o. support for the assertion that the merger between Pacific Power and Light/Utah Power and Light will provide substantial benefits due to diversification of both systems.
- p. support for the assertion that the merger of Pacific Power and Light/Utah Power and Light will reduce system operating costs through integrated economic dispatch of generation.
- q. support for the assertion that the merger of Pacific Power and Light/Utah Power and Light will reduce system reserve requirements and improve system reliability.
- r. support for the assertion that the merger of Pacific Power and Light/Utah Power and Light will provide for consolidation of duplicate service resulting in future operating savings. Specify the services which are duplicative and the resultant savings associated with the consolidation of these services.

- s. support for the assertion that the merger of Pacific Power and Light/Utah Power and Light will enhance opportunities for employees of both companies. Provide detail as to the employment opportunities to be gained from the merger and the resultant effect on the economic well-being of each employee.
- t. support for the assertion that the merger of Pacific Power and Light/Utah Power and Light will help reduce and stabilize power prices to Pacific Power and Light and Utah Power and Light customers with the resultant effect of stimulated additional growth and mitigation of competitive threats.
- u. system reliability of both Pacific Power and Light's and Utah Power and Light's systems associated with the sharing of spinning reserves resulting from the merger of Pacific Power and Light/Utah Power and Light.
- v. the results of cost allocations to the various state jurisdictions both before the merger of Pacific Power and Light and Utah Power and Light and after the merger into PacifiCorp, Oregon.
- w. support for the assertion that efficiencies and improved market access resulting from the merger of Pacific Power and Light/Utah Power and Light will afford the merged companies better opportunities to compete more effectively in both resale and wholesale markets.
- x. the price elasticity of both Pacific Power and Light's and Utah Power and Light's retail and wholesale customers.
- y. the financial effect on the merged company, PacifiCorp (Oregon), resulting from the promised 2% reduction in Utah Power and Light's current rates.

DATED this 17th 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 Initial Data Requests to Applicants" was mailed, postage prepaid (except where otherwise indicated), this 17th day of November, 1987, to the following:

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