

File



# Public Service Commission of Utah

4th FLOOR, HEBER M. WELLS BUILDING, 160 EAST 300 SOUTH  
P.O. BOX 45585, SALT LAKE CITY, UTAH 84145  
TELEPHONE: (801) 530-6716

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## MEMORANDUM

TO: Merger Case Applicants (Case No. 87-035-27)  
FROM: Staff, Public Service Commission of Utah  
DATE: December 11, 1987  
SUBJECT: DOCUMENTATION REQUEST LIST FROM DECEMBER 3, 1987  
TECHNICAL CONFERENCE

The PSC Staff agreed at the December 3rd Technical Conference to compile a master list of the documentation requests which the Applicants agreed to provide. This list is attached to this Memorandum. The Applicants agreed to provide copies of their responses to each of the parties represented at the Technical Conference.

On December 7, the Applicants submitted a major filing of testimony and exhibits which apparently are intended to replace the earlier filings. Some of the information requested in the attached list may be included in today's filing. If so, reference to the appropriate testimony and exhibits will suffice to meet the requests; duplicate copies need not be sent.

We continue to believe that the technical conference mechanism will facilitate the hearing process and lead ultimately to a more rapid resolution of the case by this Commission. We appreciate your openness and willingness to participate in these efforts.

cc: Doug Eldredge  
UP&L  
P.O. Box 899  
SLC, UT 84110

Dennis Steinberg  
Pacific Power & Light Company  
920 Southwest 6th Avenue  
Portland, OR 97204

ITEMS TO BE SENT PURSUANT TO THE DECEMBER 3, 1987 TECH CONFERENCE

CASE NO 87-035-27 UP&L - PP&L MERGER

Resource Plan Impact Analysis -- Request of PSC Staff

1. Table showing component details of the "Transmission Line and Jim Bridger Capital Expenditure" tables which accompanied the Capacity Expansion Plan spreadsheet diskettes.
2. Documentation of the ten columns of data appearing in the "Pacific Power & Light Company ALTERNATIVE RESOURCES" table which accompanied the Capacity Expansion Plan spreadsheet diskettes; ie of the columns labeled: Cogen 2, Cogen 1, SCE Energy, WNP#3 Settlement, 7(f), 30 Mill conservation, 40 Mill Conservation, and Mine Mouth Coal.
3. Data sources for Column 1 (Priority Firm Rate BPA ... ) and Column 3 (Forecasted Capacity Rate ... ) in the "Growth in BPA Forecasted Capacity Rate based on BPA Firm Rate Escalation" table which accompanied the Capacity Expansion Plan spreadsheet diskettes.

Resource Plan Impact Analysis -- Request of DPU Staff

1. Workpapers related to UP&L's existing resources of 2,850 MW (vs. 3,160 MW in the Cogen case)
2. Workpapers related to AFCB and Combustion Turbine capital and operating costs and the 144 MW size (vs. 100 MW in Cogen case)
3. Workpapers related to Gadsby 1, 2, & 3 and the timings of their reactivations into the system.
4. Workpapers related to the construction of Exhibit 3.16 titled, "Summary of Alternative Resources."
5. Natural gas price inflation rate assumptions used in the analyses.

Resource Plan and Production Cost Impact Analyses -- Request of CCS Staff and Consultants

1. Workpapers supporting Exhibit 3.16 of Mr. Boucher's 2nd supplemental testimony (including those options evaluated which do not appear on Exhibit 3.16, e.g. re-activation, CTS, etc).

2. Workpapers supporting the assumptions of the amount of existing UP&L resources in Mr. Boucher's loads and resources exhibits.
3. DRI forecast for Mt. Fuel.
4. Studies of fluidized bed and combustion turbine resource options.
5. The BPA NR and CF rates and restrictions used by PP&L in its study (BPA letter alluded to by Mr. Steinberg), including high mid and low forecasts with the underlying assumptions.
6. Spreadsheets upon which the plant O & M costs in PP&L model are based.
7. The reliability analyses underlying Mr. Boucher's required reserves reduction benefit of the merged UP&L/PP&L systems (both summary sheets and underlying analyses); i.e. required reserves both before and after merger.
8. The code, input and output listings for the PUM (market model) currently on mainframe and, copies of the listings on diskette or tape.
9. The MAINPLAN and PROMOD analyses of UP&L system which demonstrate the equivalence of these two models (detailed monthly, inputs and outputs, workpapers, card image input data).
10. The benchmark analyses performed by PP&L to demonstrate the equivalence of their model and MAINPLAN applied to the UP&L system (detailed monthly inputs and outputs, workpapers, card image input data).
11. The MAINPLAN runs (detailed monthly inputs and outputs, workpapers, card image input data) used by PP&L in its merged VS non-merged studies, including all extra-model analyses and workpapers of UP&L used to create the purchase block inputs to PP&Ls analyses.
12. The source code documentation, inputs and outputs of the "Transfer Program" used to establish the east to west transmission limits used in PP&L's merger study, and how these outputs were so used.
13. All analyses used to reduce the monthly Pacific Intertie limits to the capacities utilized as inputs in the PP&L merger study.

14. The DRI California gas market study relied upon by PP&L, PP&Ls own related analyses of gas prices, and the analyses used to combine the two.
15. UP&L call to EMA to facilitate CCS (SERA) acquisition of proprietary information related to the MAINPLAN and PROMOD analyses used in the merger studies.
16. Analyses which demonstrate that an additional 50 to 100 MW firm sale would be effected with the merger, over and above the firm sales when are assumed for UP&L and PP&L separately.
17. (a) Provide at least one allocation scheme by which the merger analyses and results provided by Mr. Steinberg and Mr. Reed would translate into the 5 to 10 percent rate reduction in UP&L system over the next 4 years, alluded to in the Company's testimony.  
  
(b) Provide the calculations using the above scheme(s) which produce the above results.