
In the Matter of the Application of)	Second Discovery Requests
Public Service Company of Colorado for)	of the CPUC Staff - Paul Caldera
Approval of an Energy Exchange Agreement)	Served on Public Service Company
Between Public Service Company of)	
Colorado and Pacificorp)	
)	
Docket No. 12A-256E)	May 11, 2012

DISCOVERY REQUEST NO. CPUC2-1:

Does Public Service consider this filing in Docket No. 12A-256E to satisfy the requirements of Ordering paragraphs 5 (a) and (b) in Decision No. R06-1106, Docket No. 06A-015E?

RESPONSE:

Yes.

Sponsor : Robin Kittel

Response Date: May 18, 2012

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DISCOVERY REQUEST NO. CPUC2-2:

Referencing Decision No. R06-1106, Ordering paragraphs 5 (c), (d), (e) and (f), does Public Service object to these terms and conditions being applied to all electric resource plans filed during the term of the new Energy Exchange Agreement?

RESPONSE:

At the time that Decision No. R06-1106 was issued, the settlement provided for a process of ramping down its purchases under the LTPSA. In other words, it was still purchasing some level of capacity and energy under that agreement and continued to do so in subsequent years. However, by the time the new Energy Exchange Agreement goes into effect, Public Service will not be required to make any level of purchases under the LTPSA. In this context, the requirements of 5(d), (e), and (f) will no longer be applicable. Public Service would continue to comply with 5(c) in its resource plans.

Sponsor : Jim Hill

Response Date: May 18, 2012

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DISCOVERY REQUEST NO. CPUC2-3:

Referencing the beginning of the first paragraph of Section III of the Stipulation and Settlement Agreement filed on July 25, 2006 and accepted by Decision No. R06-1106, does the Company object that the new Energy Exchange Agreement shall have priority over Public Service's Generation Book and its Proprietary Book during the evaluation of all proposed purchases to satisfy the Company's obligations to deliver power to PacifiCorp under the new Energy Exchange Agreement?

RESPONSE:

We believe that this question may not be correctly citing the intended paragraph. Our intent is that the practice reflected in Section III.2 would continue to apply to the new Energy Exchange Agreement.

Sponsor : Robin Kittel

Response Date: May 18, 2012

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DISCOVERY REQUEST NO. CPUC2-4:

Referencing the middle of the first paragraph of Section III of the Stipulation and Settlement Agreement filed on July 25, 2006 and accepted by Decision No. R06-1106, does the Company object to agreeing to thoroughly document in its accounting database all power purchases made at the designated hub on the day that the Company purchased power to satisfy its obligations under the new Energy Exchange Agreement and to demonstrate that the purchase that was assigned to the new Energy Exchange Agreement was the lowest cost of all purchases made on that day at the designated hub that could have satisfied the new Energy Exchange Agreement?

RESPONSE:

The Company has no objection to agreeing to continue the accounting related documentation requirements of the paragraph number 2, Section III of the Stipulation and Settlement Agreement filed on July 25, 2006 and accepted by Decision No. R06-1106.

Sponsor : Price Hatcher

Response Date: May 18, 2012