

Q.UPC:UHS/RPI.4-55: Regarding A. UPC:UHS/RPI.2-10:

- a. Did you discuss the potential for converting the King George School to "a residential care facility of some type" with any UHS employees? If so, whom and when?
- b. Admit that UHS owns and operates "residential care facilities."
- c. In preparing your alternative economic analysis, which assumes the conversion to a residential care facility, did you consult UHS regarding the actual costs associated with operating and maintaining a residential care facility? If so, what if any information did you receive from them regarding financial information.. If not, why not?
- d. When conducting an economic evaluation of a potential residential care facility operated by UHS, would it be more accurate to rely on UHS' own analysis of the actual operating costs of such a facility, rather than general industry estimates of operating costs? If not, please explain.

A.UPC:UHS/RPI.4-55:

- a. No.
- b. We have no specific knowledge that the company has any facilities of the type contemplated in the alternative economic impact analysis.
- c. No. Again, the purpose of that part of the analysis was to recognize that there was likely a viable alternative use for the current facility other than having it close down altogether or revert to its pre-King George School agricultural use. Each of those alternatives would likely reflect a significantly lower valued use than the alternative use that was included in our previous testimony. As noted in previous filings (A.UPC:UHS/RPI.2-18), EPR included that use in our impact assessment analysis in order to be "conservative" in our assessment of the likely negative impacts associated with this project on the operations of the King George School. That assumption therefore resulted in "conservative" estimates of some of the most significant negative impacts that are likely to result from the approval of the proposed project on the regional and state economy.
- d. No, the question implies a specific ownership structure for the alternative facility. The alternative analysis made no assumptions about the ownership of the potential alternative facility.

Docket No. 7156  
Response of UHS and RPI to UPC's 4th Set  
of Discovery Requests  
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Administrative Unit: Economic & Policy Resources, Inc.  
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