

ICNU Data Request 21.1

Please refer to Bryce Dalley's direct testimony, which states that PacifiCorp is currently earning a return on equity ("ROE") of 1.9% and PacifiCorp's response to ICNU data request 20.1.

- a. Please provide all workpapers and supporting documents for both the 1.9% ROE calculation and the calculation of the 70 basis points.
- b. Please identify the amount of renewable energy credits and time period assumed for the 70 basis point calculation.
- c. Please explain why the Washington normalized results do not include revenues from the sale of renewable energy credits ("RECs").
- d. Please identify all other revenues which are not included in normalized ROE results.
- e. Please recalculate, or provide ICNU with the information to calculate, the basis point adjustment that would result if actual RECs up to the end of June 2010 were included in the Washington ROE. Please provide all supporting documentation, including the amount of RECs.
- f. Please recalculate, or provide ICNU with the information to calculate, the basis point adjustment that would result if actual and expected RECs up to the end of December 2010 were included in the Washington ROE. Please provide all supporting documentation, including the amount of RECs.

Response to ICNU Data Request 21.1

- a. The 1.9% ROE figure can be found on page 1.0, line 60, column 3 of Exhibit No. ____ (RBD-3).

The Company's rebuttal adjustment associated with REC revenues is shown on page 12.0 Total, column 12.5 - Green Tag Revenues of Mr. Dalley's Rebuttal Exhibit No. ____ (RBD-6). This adjustment adds \$4,784,095 of revenues to Washington normalized results. These revenues increase Washington ROE by 78 basis points, as shown on line 60 labeled "Effect on ROE."

- b. Please refer to the Company's 12.5 Rebuttal REC Revenues Adjustment as filed in the Company's Rebuttal Exhibit No. ____ (RBD-6).
- c. Based on the Company's plan to not sell Washington-allocated eligible RECs during the twelve-months ending March 31, 2012 for compliance with

Washington's Renewable Portfolio Standard (RPS), WAC 480-109-020, the Company did not reflect any revenues associated with REC sales in its initial filing. However, as described by Mr. Duvall and Mr. Dalley in their rebuttal testimonies, the Company's normalized Washington rebuttal results include approximately \$4.8 million of Washington-allocated REC revenues.

- d. Please refer to Mr. Dalley's Exhibit No. ____ (RBD-3) and Exhibit No. ____ (RBD-6) for detailed description of restating and pro forma ratemaking adjustments to other revenues from the Washington unadjusted ("per books") results of operations.
- e. As shown on page 2.2 of Exhibit No. ____ (RBD-6), line 68, \$6,212,724 of Washington-allocated revenue requirement impacts ROE by 100 basis points.

For the actual amount of RECs and REC revenues received on a Washington-allocated basis for January 2009 through February 2010, please refer to the Company's response to ICNU Data Request 9.1. For these same figures through June 2010, please refer to the Confidential Tables 1 and 2. These reports were provided to parties on October 29, 2010 pursuant to the terms of the Stipulation adopted by the Commission in WUTC Docket UE-090205.

- f. July through December 2010 REC revenues on a Washington-allocated basis are unavailable at this time.

PREPARER: R. Bryce Dalley / Gregory N. Duvall

SPONSOR: R. Bryce Dalley / Gregory N. Duvall