

April 29, 2011

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Attention: David W. Danner
Executive Director and Secretary

RE: **UE-100170**
Schedule 191 – System Benefits Charge Adjustment

Dear Mr. Danner:

Ordering paragraph 8(d), Order 02 (modifying Order 01), Docket UE-100170 requires PacifiCorp, d.b.a. Pacific Power (PacifiCorp or Company), to file for revisions to Schedule 191 - System Benefits Charge Adjustment (SBC) by May 1, 2011. The Company submits this filing in compliance with the Commission's direction.

As more fully described below, the Company is not proposing a revision to the SBC collection rate at this time. The current SBC is set at the appropriate level to enable the Company to recover its costs associated with acquiring cost effective conservation within its Washington service area and to comply with the requirements of Initiative Measure No. 937, which is codified as RCW 19.285.040 and implemented through WAC 480-109.

The SBC was last adjusted in October 2009 when it was increased from an annual collection rate of \$4.5 million to the current collection rate of \$8.8 million. The current SBC collection rate was approved in Docket UE-091516 with an effective date of October 30, 2009. As of December 2010, the SBC collection rate represents approximately 3.0 percent of Washington electric revenues. In 2010, \$8.9 million was collected through the SBC. As reported in the Company's 2010 Washington annual report on conservation,¹ PacifiCorp acquired 41,727,271 kWh (4.76 aMW) in energy efficiency resources in 2010 at a total resource cost test result of 2.640. These acquisitions were funded through the current SBC collection rate.

As of March 31, 2011, the SBC deferred account balance was \$579,000. The Company has projected SBC revenue and conservation acquisition related expenditures through December 2011. As demonstrated in Attachment A, applying projected SBC collections of \$6.4 million to the March 2011 balance, offset by projected conservation expenditures of \$6.8 million, results in

¹ Filed with the Commission on March 31, 2011 in Docket UE-100170.

a projected SBC deferred account balance of approximately \$202,000 as of December 2011. Program level expense detail is provided in Attachment B.

Not included in the projected December 2011 balance are costs the Company expects to incur in 2011 for a production efficiency study. In approving the Company's 2010-2011 I-937 conservation targets, the Commission ordered PacifiCorp to include in its filing identifying its ten-year achievable conservation for 2012-2021 and biennial conservation target for 2012-2013 conservation potential for production efficiency.² To properly assess production efficiency potential for inclusion in this filing, the Company will conduct a study of its generation facilities which are subject to this requirement. PacifiCorp expects to commence the study later in 2011 such that production efficiency potential identified may be included in the ten-year conservation potential for 2012-2021, which is due to be provided by January 1, 2012.³ The Company will incur costs beyond those identified herein to complete this study.

As a result of the projected December 2011 SBC balance along with the additional costs expected for the production efficiency study, the Company proposes no change to the present SBC rate at this time. The Company will continue to monitor the SBC deferred balance and will propose adjustments to the SBC collection rate in the future as appropriate.

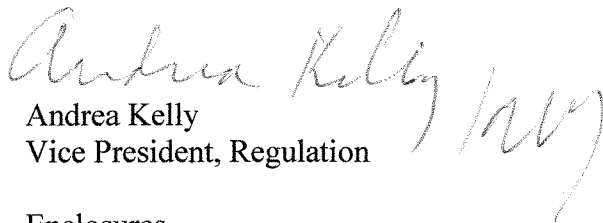
It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon, 97232

Informal questions regarding this filing should be directed to me at (503) 813-6043.

Sincerely,


Andrea Kelly
Vice President, Regulation

Enclosures

² Ordering paragraph 8(f), Order 02 (modifying Order 01), Docket UE-100170.

³ Ibid.

ATTACHMENT A

Washington System Benefits Charge Deferred Account Analysis

	Monthly Conservation Costs	SBC Recovery	Carrying Charge	Accumulated Balance
Dec 2009 Balance				1,412,648
January	585,893	(957,761)	-	1,040,781
February	217,031	(769,113)	-	488,699
March	524,060	(673,747)	-	339,011
April	624,888	(663,264)	-	300,635
May	291,291	(626,864)	-	(34,937)
June	855,266	(641,020)	(253)	179,056
July	817,589	(678,602)	-	318,044
August	580,544	(753,993)	-	144,595
September	599,485	(695,686)	-	48,394
October	407,795	(679,965)	-	(223,776)
November	457,161	(690,496)	-	(457,112)
December	1,762,502	(915,430)	-	389,961
2010 Totals	<u>7,723,506</u>	<u>(8,745,941)</u>	<u>(253)</u>	
January	310,217	(928,882)	-	(228,704)
February	641,244	(788,235)	-	(375,695)
March	549,283	(752,154)	-	(578,567)
April	850,000	(673,057)	-	(401,623)
May	1,085,709	(636,119)	-	47,967
June	797,887	(650,484)	-	195,369
July	538,421	(688,621)	-	45,169
August	678,171	(765,125)	-	(41,785)
September	483,286	(705,957)	-	(264,456)
October	1,019,147	(690,004)	-	64,687
November	592,059	(700,691)	-	(43,944)
December	771,168	(928,946)	-	(201,722)
2011 Totals	<u>8,316,593</u>	<u>(8,908,275)</u>	<u>-</u>	

Note: Figures provided through March 2011 reflect actual results

ATTACHMENT B

Washington Conservation Acquisition Costs

	Jan 2010	Feb 2010	Mar 2010	Apr 2010	May 2010	Jun 2010	Jul 2010	Aug 2010	Sep 2010	Oct 2010	Nov 2010	Dec 2010	Total 2010
Energy FinAnswer (125)	46,323	21,868	29,099	41,429	36,913	12,157	26,071	37,422	24,907	9,956	41,105	106,158	433,107
Industrial FinAnswer (125)	135,144	64,307	95,095	155,564	74,491	98,861	133,209	122,460	49,559	107,452	62,722	797,429	1,896,292
Commercial Direct Install	-	-	-	-	-	-	-	-	-	-	-	-	-
Commercial FinAnswer Express (115)	52,683	26,653	143,305	121,245	24,469	91,039	136,725	27,530	167,592	13,081	56,843	293,646	1,155,031
Commercial Curtailment	-	-	-	-	-	-	-	-	-	-	-	-	-
Industrial FinAnswer Express (115)	15,578	10,889	43,274	61,283	11,501	43,500	95,205	7,809	39,770	3,100	25,576	44,639	402,125
Commercial and Industrial Total	249,728	123,717	310,773	379,520	147,395	245,558	391,209	195,221	281,528	133,590	186,247	1,242,072	3,886,556
Low Income Weatherization (114)	35,608	6,140	14,664	227	1,911	64,328	179,143	12,540	36,066	6,739	17,472	72,482	447,320
Home Comfort	-	-	-	333	-	-	-	333	-	-	-	-	1,249
Energy Education in Schools (113)	64,064	845	77,177	21,128	37,573	40,153	13,142	43,763	29,786	37,213	32,090	43,043	439,978
Refrigerator Recycling (107)	27,860	18,048	1,254	45,327	50,784	31,184	3,109	51,319	284	56,427	30,903	37,742	356,450
Residential New Construction	-	-	1,158	(1,158)	-	3,000	(3,000)	-	-	-	-	6,000	6,000
Home Energy Savings (118)	203,239	62,450	113,285	178,784	53,618	84,740	135,557	178,821	153,637	76,149	91,853	148,644	1,480,777
Residential Total	330,771	87,483	207,538	244,642	143,896	223,405	327,951	286,976	219,773	178,528	172,319	308,494	2,731,775
NEEA	5,395	5,831	5,749	726	-	386,303	98,429	98,348	98,185	88,290	88,208	88,037	963,501
Conservation Voltage Reduction Study	-	-	-	-	-	-	-	-	-	7,387	10,367	123,899	141,674
Customer Outreach and Communication	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Conservation Costs	585,893	217,031	524,060	624,888	291,291	855,266	817,589	560,544	699,485	407,785	457,161	1,762,502	7,723,506

Washington Conservation Acquisition C

	Jan 2011	Feb 2011	Mar 2011	Apr 2011	May 2011	Jun 2011	Jul 2011	Aug 2011	Sep 2011	Oct 2011	Nov 2011	Dec 2011	Total 2011
Energy FinAnswer (125)	11,223	23,773	33,122	-	173,635	-	61,943	-	-	-	-	72,844	376,540
Industrial FinAnswer (125)	31,951	113,167	92,675	355,451	371,098	259,739	-	202,863	9,680	568,066	134,170	72,844	2,201,702
Commercial Direct Install	-	1,390	-	-	-	-	-	-	-	-	-	-	1,390
Commercial FinAnswer Express (115)	41,617	93,966	43,332	80,000	85,000	85,000	85,000	85,000	85,000	85,000	85,000	85,783	939,698
Commercial Curtailment	2,223	1,112	-	-	-	-	-	-	-	-	-	-	3,335
Industrial FinAnswer Express (115)	10,383	27,505	11,815	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	274,702
Commercial and Industrial Total	97,397	260,912	180,945	460,451	654,733	369,739	171,943	312,863	119,680	668,066	244,170	256,470	3,797,367
Low Income Weatherization (114)	87,060	15,524	9,078	44,000	44,000	44,000	44,000	44,000	44,000	44,000	44,000	44,000	507,662
Home Comfort	87	348	348	-	-	-	-	-	-	-	-	-	784
Energy Education in Schools (113)	31,876	74,003	33,795	35,000	35,000	35,000	35,000	35,000	35,000	35,000	35,000	35,000	454,674
Refrigerator Recycling (107)	1,502	14,899	19,715	24,795	37,562	40,754	40,754	40,754	37,562	27,987	24,795	81,603	392,682
Residential New Construction	-	-	-	-	-	-	-	-	-	-	-	-	-
Home Energy Savings (116)	112,637	125,286	187,552	117,444	117,444	117,444	117,444	117,444	117,444	117,444	117,444	227,444	1,592,475
Residential Total	233,162	230,060	250,489	221,239	234,006	237,198	237,198	237,198	234,006	224,431	221,239	388,048	2,948,277
NEEA	50,911	52,841	50,811	91,703	91,703	91,703	95,000	95,000	95,000	95,000	95,000	95,000	989,772
Conservation Voltage Reduction Study	(71,253)	97,431	66,838	76,607	74,017	67,897	3,030	1,860	3,350	400	400	400	321,177
Customer Outreach and Communication	-	-	-	-	31,250	31,250	31,250	31,250	31,250	31,250	31,250	31,250	250,000
Total Conservation Costs	310,217	641,244	549,283	850,000	1,085,709	797,887	535,421	678,171	483,286	1,019,147	592,059	771,168	8,316,593