

PC Data Request 176

RE: Rebuttal testimony of Erich D. Wilson, p. 9, lines 4-7.

The Company states the following, “it appears that Public Counsel selected only one data source when matching each position, an improperly narrow approach to assessing market data. As a result, Public Counsel’s conclusions about appropriate market compensation levels reflected in Exhibit No. 15C are inaccurate.” Please provide a revised version of Exhibit No. 15C, in the exact same format as Exhibit No. 15C, but with a revised column C that shows, for each of the 25 positions included in the exhibit, overall average market compensation levels at the 50 percentile **using all job matches from the data provided in MarketPay** for each of the 25 employee positions included in the exhibit. Please also provide a revised column D to reflect the updated difference in total cash compensation between columns B and C.

Response to PC Data Request 176

Please refer to Confidential Attachment PC 176 for the requested data. The Company has included the market midpoint (column G), which includes both base salary and target incentive components for each of the respective positions. This market midpoint was developed using the methodology described in Erich D. Wilson’s direct and rebuttal testimonies. Please refer to Exhibit No. ___(EDW-1T) at pages 4-5 and Exhibit No. ___(EDW-3T) at page 7-8.

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: Erich D. Wilson / Leslie Chase

SPONSOR: Erich D. Wilson

PACIFICORP'S RESPONSE TO PUBLIC COUNSEL DATA REQUEST 176

CONFIDENTIAL ATTACHMENT PC 176

IS CONFIDENTIAL IN ITS ENTIRETY

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REDACTED VERSION