STAFF CROSS-EXHIBIT LIST

Docket UE-130043

NUMBER	WITNESS	A/R	DATE	DESCRIPTION
RBD	Bryce Dalley			PacifiCorp's response to WUTC Data Request No. 240 (2 pages)
				PacifiCorp's response to WUTC Data Request No. 265 (2 pages)
				PacifiCorp's response to WUTC Data Request No. 286 (8 pages)
				Derivation of the Control Area Generation West Allocation Factor, PacifiCorp versus Staff for the Twelve Months Ended June 30, 2013 (1 page)
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UE-130043/PacifiCorp May 1, 2013 WUTC Data Request 240

WUTC Data Request 240

Requestor: Kendra A White

Allocation Factors

Please explain how to create a new allocation factor within the RAM and JAM models used in the Company's case. If it is not possible to create a new allocation factor, please explain.

Response to WUTC Data Request 240

The RAM and JAM are currently designed to allocate the factors approved in the West Control Area inter-jurisdictional allocation methodology (WCA), which was provided as Exhibit No.__(SRM-5). Creating a new allocation factor would deviate from the Commission approved allocation methodology and would require updates to almost every tab in both the RAM and JAM, in addition to updating the defined ranges in the macros.

For the JAM, the macros used in the model would need to be edited to incorporate any changes to the defined ranges. The following tabs would require updates:

- Function
- Function 1149
- Report
- UTCR
- NRO
- ADJ
- URO
- Factors

Updates to the RAM would depend on the factor being created, but a factor allocating system-wide costs would affect the following tabs:

- REV
- OM
- NPC
- DEPR
- TAX
- RB
- ContractChange
- Results
- AdjSummary
- Valid Acct-Factor Combo
- Factors
- ExtractData
- ReportAdjData

Exhibit No. ___ (RBD-__) Docket UE-130043 Page 2

UE-130043/PacifiCorp May 1, 2013 WUTC Data Request 240

AdjDatabase

PREPARER: Gary Tawwater

SPONSOR: Steven R. McDougal

UE-130043/PacifiCorp May 29, 2013 WUTC Data Request 265

WUTC Data Request 265

Requestor: Christopher T. Mickelson

RE: Rate Design

Please re-run the Company's RAM and JAM models to reflect the 2010 Protocol, for which the other states currently use for allocation. All other adjustments should remain unrevised, if not affected.

Response to WUTC Data Request 265

The Company objects to this request as unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, the Company responds as follows:

The Company has not conducted the requested analysis nor is the Company proposing to use this methodology as part of this proceeding.

PREPARER: Bryce Dalley

SPONSOR: To Be Determined

UE-130043/PacifiCorp August 14, 2013 WUTC Data Request 265 – 1st Supplemental

WUTC Data Request 265

Requestor: Christopher T. Mickelson

RE: Rate Design

Please re-run the Company's RAM and JAM models to reflect the 2010 Protocol, for which the other states currently use for allocation. All other adjustments should remain unrevised, if not affected.

1st Supplemental Response to WUTC Data Request 265

In preparing rebuttal testimony, the Company conducted the requested analysis as referenced in the rebuttal testimony of R. Bryce Dalley, Exhibit No.___(RBD-3T) at page 12. The Company is supplementing its original response with the regulatory adjustment model (RAM) and jurisdictional allocation model (JAM) used in this analysis. Please see Attachment WUTC 265 1st Supplemental.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

UE-130043/PacifiCorp August 14, 2013 WUTC Data Request 286

WUTC Data Request 286

Requestor: Kendra A White

Please provide a list of the dates and attendees of all Multi-State Process meetings since the conclusion of the Washington Collaborative process in 2012. Please also provide any documentation of Washington Commission Staff being invited to or informed of those MSP meetings.

Response to WUTC Data Request 286

Please see Attachment WUTC 286-1 for a list of the dates and attendees of all Multi-State Process (MSP) meeting since October 25, 2012. Please note that additional meetings are scheduled throughout 2013, with the following schedule:

2013 MSP Meeting Schedule (stated in Pacific Time unless otherwise noted)

August 22 – 8:00 am to Noon – Conference Call
September 18 – 8:30 to 3:30 (Mountain) - In person meeting in Salt Lake City
October 24 – 8:00 am to Noon – Conference Call
November 14 – 8:00 am to 3:00 pm – In person meeting in Portland
December 12 – 8:00 am to Noon – Conference Call

In addition, the Company has requested that Kristi Wallis, who serves as the MSP Standing Committee Standing Neutral, contact Washington Utilities and Transportation Commission Staff directly to discuss Staff's participation in these upcoming conference calls and meetings.

Finally, the Washington Utilities and Transportation Commission was invited to the 2012 MSP Commissioners Forum. Attachments WUTC 286-2 through WUTC 286-4 contain the invitations.

The Company understands that Ms. Wallis received an email declining participation in the meeting, although Ms. Wallis provided the meetings materials by follow-up email.

PREPARER: Jana Saba/Bryce Dalley

SPONSOR: Bryce Dalley

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Subject:

FW: PacifiCorp MSP - March 16, 2012 Commissioners' Forum

----- Original Message -----

Subject:PacifiCorp MSP - March 16, 2012 Commissioners' Forum

Date: Thu, 16 Feb 2012 10:31:08 -0800

From:Kristi Wallis < Kristi Wallis @sprintmail.com>

To:jgoltz@utc.wa.gov

CC:Rebecca Wilson <a href="mailto:K

To Utility Commissioners from the Six-State PacifiCorp Jurisdictions:

Hello, Commissioner Goltz -

On behalf of the MSP Standing Committee, I would like to invite you to a Commissioners' Forum on PacifiCorp multi-state issues.

Since the adoption of the PacifiCorp Inter-Jurisdictional Cost Allocation Protocol (2010 Protocol)* by Idaho, Oregon, Utah and Wyoming in late 2004 and early 2005, Commissions from the six-state PacifiCorp jurisdictions have been invited to an annual Commissioners' Forum to hear reports from staff in a public meeting on activities under the 2010 Protocol and to discuss matters of common interest. This year's forum will be hosted by the Public Service Commission of Utah. Commissioners from Idaho, Oregon, Utah and Wyoming plan to attend.

This year's Commissioners' Forum will be held in Salt Lake City the afternoon of March 16th from approximately 1:00 to 4:00 (Mountain Time), after the adjournment of the WECC Board Meeting.

Commissioners will hear brief reports from the staff regarding an issue relating to the 2010 Protocol's treatment of the Idaho Irrigation Load Control Program and the proposed 2012 activities of the Standing Committee (including possible preparatory work for the 2013 broad review of allocation methods for 2016 and beyond). The majority of the meeting time will be spent in discussions among Commissioners on topics of mutual interest.

Final arrangements are still being made for the meeting location, but we hope to make it as convenient to the WECC offices as possible. A conference call bridge will be provided. The agenda and meetings materials will be provided to you at least two weeks before the meeting.

Please let me know if you plan to attend the meeting. Thank you for your consideration.

Best regards,

Exhibit No. ___ (RBD-__) Docket UE-130043 Page 4

Attachment WUTC 286-2

WA UE-130043 WUTC 286

Kristi Wallis MSP Standing Neutral 206-726-1699

*The 2010 Protocol is the result of extensive discussions that occurred among representatives of PacifiCorp, Commission staff members and other interested parties from Utah, Oregon, Wyoming, Idaho and Washington regarding issues arising from the Company's status as a multi-jurisdictional utility. These discussions were referred to as the Multi-State Process, or MSP. The 2010 Protocol created an MSP Standing Committee consisting of one member or delegate from each Commission. The Standing Committee convenes open meetings of interested parties at least once a year for the purpose of discussing and monitoring emerging inter-jurisdictional issues facing the Company and its customers.

Attachment WUTC 286-3

Subject:

FW: PacifiCorp MSP - March 16, 2012 Commissioners' Forum

----- Original Message -----

Subject:PacifiCorp MSP - March 16, 2012 Commissioners' Forum

Date: Thu, 16 Feb 2012 10:32:01 -0800

From:Kristi Wallis < Kristi Wallis @sprintmail.com>

To:poshie@utc.wa.gov

CC:Rebecca Wilson <a

To Utility Commissioners from the Six-State PacifiCorp Jurisdictions:

Hello, Commissioner Oshie -

On behalf of the MSP Standing Committee, I would like to invite you to a Commissioners' Forum on PacifiCorp multi-state issues.

Since the adoption of the PacifiCorp Inter-Jurisdictional Cost Allocation Protocol (2010 Protocol)* by Idaho, Oregon, Utah and Wyoming in late 2004 and early 2005, Commissions from the six-state PacifiCorp jurisdictions have been invited to an annual Commissioners' Forum to hear reports from staff in a public meeting on activities under the 2010 Protocol and to discuss matters of common interest. This year's forum will be hosted by the Public Service Commission of Utah. Commissioners from Idaho, Oregon, Utah and Wyoming plan to attend.

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Please let me know if you plan to attend the meeting. Thank you for your consideration.

Best regards,

Exhibit No. ___ (RBD-__)
Docket UE-130043
Page 6
Attachment WUTC 286-3

WA UE-130043 Kristi WaYUTG 286 MSP Standing Neutral 206-726-1699

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Subject:

FW: PacifiCorp MSP - March 16, 2012 Commissioners' Forum

----- Original Message -----

Subject: PacifiCorp MSP - March 16, 2012 Commissioners' Forum

Date: Thu, 16 Feb 2012 10:31:42 -0800

From:Kristi Wallis Kristi Wallis@sprintmail.com

To:pjones@utc.wa.gov

CC:Rebecca Wilson <a href="mailto:square-newfate-newfa

To Utility Commissioners from the Six-State PacifiCorp Jurisdictions:

Hello, Commissioner Jones -

On behalf of the MSP Standing Committee, I would like to invite you to a Commissioners' Forum on PacifiCorp multi-state issues.

Since the adoption of the PacifiCorp Inter-Jurisdictional Cost Allocation Protocol (2010 Protocol)* by Idaho, Oregon, Utah and Wyoming in late 2004 and early 2005, Commissions from the six-state PacifiCorp jurisdictions have been invited to an annual Commissioners' Forum to hear reports from staff in a public meeting on activities under the 2010 Protocol and to discuss matters of common interest. This year's forum will be hosted by the Public Service Commission of Utah. Commissioners from Idaho, Oregon, Utah and Wyoming plan to attend.

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Final arrangements are still being made for the meeting location, but we hope to make it as convenient to the WECC offices as possible. A conference call bridge will be provided. The agenda and meetings materials will be provided to you at least two weeks before the meeting.

Please let me know if you plan to attend the meeting. Thank you for your consideration.

WA UE-130043 Best regards, 286 Exhibit No. ___(RBD-__)
Docket UE-130043
Page 8
Attachment WUTC 286-4

Kristi Wallis MSP Standing Neutral 206-726-1699

*The 2010 Protocol is the result of extensive discussions that occurred among representatives of PacifiCorp, Commission staff members and other interested parties from Utah, Oregon, Wyoming, Idaho and Washington regarding issues arising from the Company's status as a multi-jurisdictional utility. These discussions were referred to as the Multi-State Process, or MSP. The 2010 Protocol created an MSP Standing Committee consisting of one member or delegate from each Commission. The Standing Committee convenes open meetings of interested parties at least once a year for the purpose of discussing and monitoring emerging inter-jurisdictional issues facing the Company and its customers.

DERIVATION OF THE CONTROL AREA GENERATION WEST ALLOCATION FACTOR PACIFICORP VERSUS STAFF FOR THE TWELVE MONTHS ENDED JUNE 30, 2013 2013 GENERAL RATE CASE

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1	Company							
2	CAGW =	(CAEW	* Energy Weighting)	+	(WCA 200 CP	*	Demand Weighting)	
3	=	22.6481%	* 62%	+	22.5913%	*	38%	
4	=	14.0418%		+	8.5847%			
5	=	22.6265%						
6								
7	Staff							
8	CAGW =	(CAEW	* Energy Weighting)	+	(WCA 200 CP	*	Demand Weighting)	
9		22.6481%	* 73%	+ ,	22.5913%	*	27%	
10	=	16.5331%		+	6.0997%			
11	=	22.6328%	-					

CAEW: Control Area Energy West

b3 and b9: McDougal Exhibit No. ____ (SRM-5) at 10. d3 and d9: McDougal Exhibit No. ____ (SRM-5) at 8. c3 and e3: McDougal Exhibit No. ____ (SRM-5) at 11. e9: Steward Exhibit No. ____ (JRS-7T) at 6:12-13.