

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
DOCKET NOS. UE-060266/UG-060267
ICNU'S RESPONSE TO PSE'S DATA REQUEST NO. 51

Data Request No. 51:

(Ref. Staff's, ICNU's and Public Counsel's Testimony on Power Costs, p. 16, lines 20-23)

Please provide any and all studies, calculations and documentation regarding "operators of hydro" that supports Mr. Schoenbeck's statement, "the AURORA modeled result does not reflect as much shaping of hydro generation into the more valuable on-peak period as the operators of hydro projects actually achieve."

Response to Data Request No. 51:

This is a joint response from Staff, Public Counsel, and ICNU. Mr. Schoenbeck will answer questions regarding this response. ICNU objects to this request on the basis that it is overly broad. Notwithstanding this objection, Mr. Schoenbeck responds as follows.

Please ICNU Response to PSE Data Request No. 50 for PSE's estimate of its on-peak energy factors. For reviewing on-peak factors of other entities, please see BPA's 2007 rate study Risk Analysis Study Documentation (WP-07-FS-BPA-04A) pages 12-14 for regional hydro factors. It should be noted that PSE's factors should be even greater than the regional values due to location of the Mid-Columbia dams being downstream from Grand Coulee.

Date: August 11, 2006
Respondent: Donald Schoenbeck
Witness: Donald Schoenbeck