

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WUTC v. Pacific Power (PacifiCorp)

Docket UE-140762 et al.

**RESPONSE OF PUBLIC COUNSEL TO BOISE WHITE PAPER, LLC
DATA REQUEST NO. 1.2**

Request No: 1.2
Directed to: Simon ffitich, Senior Assistant Attorney General
Date Received: November 25, 2014
Date Produced: December 8, 2014
Prepared by: Glenn A. Watkins

BOISE WHITE PAPER, LLC DATA REQUEST NO. 1.2 TO PUBLIC COUNSEL:

Regarding the Testimony of Mr. Watkins, Exhibit No. GAW-6T, page 2, lines 11-13: “Similarly, all electric utilities in the state have allocated the demand-related portion of production plant based on multiple hours of peak usage.”

- a. Define “multiple hours of peak usage.”
- b. Please specify, with citation, the number of hours used by each utility in the period of Mr. Watkins’ claim.
- c. In Mr. Watkins’ understanding, is a 12 Coincident Peak (“CP”) allocation based on multiple hours of peak usage? Please explain.
- d. In Mr. Watkins’ understanding, is a 4 CP allocation based on multiple hours of peak usage? Please explain.

RESPONSE:

- a. See footnote 1 to Mr. Watkins’ cross-answering testimony (Exhibit No. GAW-6T). For many years, Puget Sound was directed to calculate class peak demands based on the highest 200 hours of system peak usage. This was recently revised downward by Puget Sound to approximately 100 hours in its 2009 rate case which was settled. It should be noted that Puget Sound’s 2011 rate case also resulted in a settlement with no specific finding by the Commission on cost allocations or determination of class peak demands.
- b. Please see response to (a) above. With regard to Avista, Mr. Watkins does not recall the specific number of hours used to calculate class peak demands.

- c. Yes. By definition, 12 observations reflect “multiple” peaks.
- d. Yes. By definition, 4 observations reflect “multiple” peaks.