

May 24, 2011

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

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

Attn: David W. Danner
Executive Director and Secretary

RE: Docket UE 100749 - Compliance Filing

Dear Mr. Danner:

PacifiCorp, dba Pacific Power & Light Company (PacifiCorp, or Company) submits this filing to comply with paragraphs 206, 208 and 384 of the Washington Utilities and Transportation Commission's (Commission) Order 06, Final Order Rejecting Tariff Sheets; Authorizing Increased Rates; and Requiring Compliance Filing in Docket 100749 (Order). These paragraphs direct the Company to make certain filings within 60 days of the Order related to proceeds from sales of Renewable Energy Credits (REC). The Company has designated the attachments to this filing as confidential under the Protective Order in this docket, Order 03.

Paragraph 206 of the Order requires:

“that the Company prepare and file within 60 days following the date of this Order a detailed accounting of all REC proceeds received during the period January 1, 2009, to the most recent date for which data are available. The report must include any updated forecast of PacifiCorp's REC sales for the rate year. We direct the company to work cooperatively with Commission Staff as to the form and content of this filing so that it will prove most beneficial to the Commission.”

Paragraph 208 of the Order requires:

“the Company to file within 60 days after the date of this Order a detailed proposal for operation of the tracking mechanism going forward. This proposal should be developed in consultation with Staff and any other parties who wish to participate. The proposal must include a detailed discussion of the allocation method(s) the Company uses, or proposes to use, when allocating and reporting REC proceeds to Washington. If other parties disagree with PacifiCorp as to the details of the tracking

mechanism or the allocation and reporting method(s) PacifiCorp uses or proposes to use, they may file alternative proposals.”

Paragraph 384 of the Order states:

“PacifiCorp must file within sixty days of this Order a detailed accounting of Renewable Energy Credit (REC) revenues received since January 1, 2009, and a detailed proposal for the REC tracking mechanism as required in Section II.C.2 of this Order. These filings, as well as additional filings required to be made in connection with the REC tracker, as discussed in the body of this Order, must be made in this docket as compliance filings or reports, as required under WAC 480-07-880(1) and (3).”

Accounting for Actual REC Proceeds

Confidential Attachment 1 provides a detailed accounting of REC revenues received for calendar year 2009. It contains three spreadsheets:

Page 1 provides a summary table of actual REC revenues by month and by resource for calendar year 2009. This information is provided on a total-company basis for all of the Company’s REC sales, including sales related to renewable resources that are not included in the Company’s Washington rate base under the West Control Area (WCA) allocation methodology. The table provides the resource subtotals by control area and then as allocated to Washington. As discussed below in the REC Tracker section, REC revenues are allocated to Washington using the Control Area Generation West (CAGW) factor, the same factor used to allocate the fixed costs of the resources. This spreadsheet is very similar in form and content to Table 2 of the Company’s quarterly REC Reports that the Company has been providing to Commission Staff (Staff), Public Counsel, and Industrial Customers of Northwest Utilities (ICNU) beginning on December 30, 2009, under the terms of the Stipulation adopted in Docket UE-090205.

Page 2 provides a summary table of the actual number of RECs sold by month and by resource for calendar year 2009. The table’s format matches that of Page 1 and provides REC sales on a total-company basis, a control-area basis and a Washington-allocated basis.

Pages 3 through 11 provide transaction details by contract by month for calendar year 2009, including the contract number, the name of the entity who is the counter party, the resource from which the REC was generated, the location and type of resource by control area, the vintage of the REC that was sold, the month in which the transaction was recorded in the Company’s SAP accounting system, the REC price, the quantity of RECs sold, and the total dollars from the transaction.

Confidential Attachment 2 provides the same information described above for calendar year 2010.

Updated Forecast of REC Sales

Confidential Attachment 3 provides an updated forecast of REC revenues from January 1, 2011 through March 31, 2012. Although the rate effective period technically ends on April 2, 2012, for practical reasons, the Company rounded the forecast to the end of March 2012. This attachment contains two spreadsheets:

Page 1 provides the total forecast REC revenues by month and by resource. The estimated sales volumes are based on the number of RECs generated each month that are forecast to be sold at some time during the calendar year. Given the complexities of the contracts and the variability of generation, it is not possible for the Company to precisely forecast in which month the REC will be sold and/or the REC revenue realized. The actual REC sales reports in Confidential Attachment 1 and 2, in contrast, provide the actual REC revenues that are achieved each month irrespective the vintage of the REC (the vintage of the REC is based on the month in which the REC was generated). As such, future actual REC revenue reports will likely vary significantly on a month-by-month basis from the forecast.

Page 2 provides the total forecast number of RECs sold by month and by resource. The table's format and approach matches that of Page 1.

Confidential Attachment 4, page 1, provides the forecast of REC revenues on a Washington-allocated basis for the period from January 1, 2011 through March 31, 2012.¹

The updated forecast was developed based on the terms and conditions of executed contracts, as well as a "best guess" on future potential sales during the forecast period. The Company cautions the Commission and parties that the REC market is volatile and developing, and is significantly impacted by emerging policies and rules of each state related to renewable portfolio standard requirements.

REC Proceeds Tracking Mechanism

Explanation of Allocation of RECs

Each PacifiCorp state receives an allocation of the RECs generated by Company-owned renewable resources or acquired through power purchase agreements for the resources reflected in rates in the state. Initially, PacifiCorp uses forecast allocation factors to approximate the allocation of RECs to each state. Forecast allocation factors are updated to actual historical factors during the second quarter of the following year, once actual load data is finalized.

RECs are allocated using the System Generation (SG) factor under the Revised Protocol methodology and the CAGW factor under the WCA methodology. This allocation ensures

¹ The data in Confidential Attachment 4 for April 2012 through December 2014 is provided for illustrative purposes only to demonstrate the workings of the REC Tracker Mechanism.

that the allocation of RECs is consistent with the allocation of resource costs. Under both the Revised Protocol and the WCA, the SG and CAGW factors are used to allocate the fixed costs of renewable resources which account for the vast proportion of the overall costs of renewable resources.

PacifiCorp employs the WCA inter-jurisdictional allocation methodology for the purpose of allocating its costs to customers in the state of Washington. The WUTC approved the WCA allocation methodology in Order 08, Docket UE-061546. The west control area includes California, Oregon and Washington. Generation assigned to the west control area includes resources located within the west control area or with physical capability to deliver energy into the west control area. As noted above, RECs generated by renewable resources that have been found prudent and used and useful for service to Washington customers are allocated to Washington based on the CAGW factor. As such, Washington does not receive an allocation of RECs associated with renewable resources that have not been included in rates in Washington - those located in the east control area.² This results in an unallocated portion of RECs from east control area renewable resources.

PacifiCorp employs the Revised Protocol inter-jurisdictional allocation methodology for purpose of allocating its costs to PacifiCorp customers in California, Idaho, Oregon, Utah, and Wyoming. RECs associated with all renewable resources are allocated to these states based on the SG factor. The application of different allocation methodologies implies a deficit of RECs associated with west control area resources. Although the different allocation methods among states require additional tracking, consistent with the Western Renewable Energy Generation Information System (WREGIS) and state renewable portfolio standard (RPS) requirements, under no circumstances will any RECs be double-counted as adherence to the WREGIS Operating Rules eliminates that possibility.

The above explanation was previously provided to Staff, Public Counsel, and ICNU on December 31, 2009, in compliance with the following term of the Stipulation adopted in UE-090205:

“The Company agrees to provide a report prior to January 1, 2010 that includes: (1) an explanation of how Renewable Energy Credits (“RECs”) and associated costs and/or revenues are allocated among PacifiCorp’s six states; (2) an explanation of how the Company determines proper disposition of RECs on a total-company and state-by-state basis; and (3) a detailed accounting of the total-company RECs that were sold and the total-company RECs that were retained for each year from calendar year 2005 through June 2009.”

² Similarly, Oregon does not receive an allocation of RECs associated with the Rolling Hills wind resource because it is not included in rate base in Oregon.

REC Proceeds After January 1, 2010

Paragraph 207 of the Order states:

“We require this detailed accounting, in part, considering the disputed question of whether PacifiCorp should be required to include, in what we here describe as a tracker account, REC proceeds received during the periods after the test year, including those received during the pendency of this proceeding. Staff proposed that REC proceeds received after January 1, 2010, be accounted for and established as a regulatory liability on the Company’s books, the rate treatment of which could be determined in a future proceeding. Another possible starting date for such an account might be the date on which PacifiCorp made its initial filing in this proceeding, which put the rate and accounting treatment of REC revenues in issue. Other possible dates are conceivable, including the start of the rate year. We do not finally resolve these questions in this Order. We require additional briefing on the subject, and may require additional evidence. We will establish process and schedule for this by subsequent notice.”

The information provided on page 1 of Confidential Attachment 2 provides the detailed information that is necessary to inform and implement, if applicable, the future Commission decision related to the tracking mechanism for Washington-allocated REC revenues received after January 1, 2010. For the reasons set forth in PacifiCorp’s post-hearing briefs in this docket, PacifiCorp continues to object to the inclusion of these past REC revenues in the tracking mechanism. The allocation methodology discussed above is applied to the subtotal of REC revenues from west control area resources to calculate Washington’s allocated share of REC revenues. This is shown on the final line of the spreadsheet. This allocation method to calculate Washington’s allocated share of REC revenues for 2009 and 2010 was first applied in the December 31, 2009, Quarterly REC Revenue Report discussed above, and was applied in each subsequent Quarterly REC Revenue Report.³ In addition, this allocation method was applied in the 2009 Commission Basis Report filed April 30, 2010 and the 2010 Commission Basis Report filed April 29, 2011.⁴ Finally, this allocation method was applied in the Company’s rebuttal filing in this docket.

Tracking Mechanism Going Forward

The Company’s detailed proposal for operation of the REC tracking mechanism going forward focuses on two key elements: (1) the annual process for reconciliation, and (2) the method for calculating Washington-allocated REC revenues.

³ Subsequent reports were provided to Staff, Public Counsel and ICNU on July 28, 2010, October 29, 2010, February 1, 2011 and April 29, 2011.

⁴ The Company’s restated earned ROE in 2009 and 2010 was 5.28% and 6.69%, respectively, including the impact of the REC revenues.

Reconciliation Process:

Paragraphs 205 and 206 of the Order provide direction to the Company with respect to the reconciliation process:

“At the end of the rate year, PacifiCorp will be required to submit a full accounting of REC proceeds actually received during the preceding 12 months. This accounting will be considered in light of other information to determine if the amount of credits that should have been returned to customers exceeds or fall short of the estimated \$4.8 million upon which the initial bill credits are based. In other words, the Commission will authorize a true-up of the initial credits that can be reconciled as credits are paid during the following 12 months.

At the end of the rate year and each subsequent annual period after the end of the rate year, PacifiCorp will be required to provide an estimate of the REC proceeds it expects to receive during the following 12 months. This is the amount on which credits during that period will be based. As at the conclusion of the initial period there will be a true-up at the end of each subsequent 12 month period.”

Although the Order ties the annual true-up to the rate year in this proceeding (April 3, 2011 through April 2, 2012), the Company respectfully requests that the Commission amend the Order to allow REC accounting and tracker true-ups to be based on a calendar year beginning in 2012. To this end, the Company proposes the following:

- By May 1, 2012, PacifiCorp will submit a full accounting of REC revenues actually received from April 1, 2011 through December 31, 2011. In each subsequent year, the accounting of actual REC revenues will be provided for the full calendar year.
- By May 1, 2012, PacifiCorp will also provide an estimate of the REC proceeds it expects to receive for calendar year 2012. In each subsequent year, an estimate for that subsequent calendar year will be provided.
- The Company proposes to accrue interest on any positive or negative balance in the tracker at the Company’s authorized weighted average cost of capital (WACC). Under the Order, this results in a 7.81% interest rate.

The Company proposes to file an advice letter on May 1 of each year to increase or decrease the renewable energy revenue adjustment credit in Schedule 95 to reflect the true-up for the historical period and the estimate of future proceeds. The advice letter filing would then be reviewed by parties and approved at a Commission public meeting.

Calculation of Washington-allocated REC Revenues:

Beginning in 2011, the Company will hold RECs for compliance with the Washington RPS, which means that fewer Washington-allocated RECs will be available for sale. As discussed above, the difference between the Revised Protocol and WCA allocation methodologies also creates complexities. For RPS compliance, a REC cannot be used more than once, or for

more than one state. While in the past, the Company was not restricted from over-allocating REC revenues, under state RPS requirements, it is precluded from over-allocating the actual RECs. The calculation of revenues to be allocated to Washington under the REC tracking mechanism is designed to address this restriction.

The detailed calculation of the Washington-allocated REC Revenues for 2011 and beyond is provided beginning on page 2 of Confidential Attachment 4. Page 2 and 3 of the Confidential Attachment provide the calculation of Washington-allocated REC revenues associated with west control area resources that are eligible for compliance with the Washington RPS. Pages 4 and 5 of the Confidential Attachment provide the calculation of Washington-allocated REC revenues associated with west control area resources that are not eligible for compliance with the Washington RPS. A small portion of these resources are eligible for compliance with the Oregon and/or California RPS. Due to the difference between the rate period and the calendar year, for 2011 and 2012, the data is reflected in two columns for each year; a three-month period from January to March and a nine-month period from April to December.

RPS-Eligible RECs:

- Page 2, lines 1-5 show the total forecast generation and RECs from Washington RPS-eligible resources.
- Lines 7-11 apply the CAGW allocation factor to the forecast generation to calculate the Washington-allocated RECs from Washington RPS-eligible resources by year.
- Washington's RPS requires utilities to provide 3% of the average prior two years retail sales from eligible renewable resources by January 1st of compliance years 2012 through 2015. Line 13 shows the RPS requirements based on load forecasts shown in the tables at the bottom of the page.
- Line 15 shows the actual RECs that are available to be allocated to Washington for Washington RPS-eligible resources based on the Revised Protocol. To ensure compliance with the RPS, the Company will make a below-the-line purchase for the difference between the Washington RPS compliance requirement and the estimated Washington eligible RECs using the Revised Protocol allocation method (SG Factor). (Line 16)
- Line 19 shows the Company's estimates of Washington's allocation of "pseudo" RECs in excess of its annual compliance targets for 2012 through 2015.
- The percentage of Washington's pseudo excess RECs "sold" is determined by taking the actual eligible WCA RECs sold divided by the total eligible WCA RECs available for sale. This percentage is then applied to Washington's pseudo excess RECs. The percentage of actual RECs sold is calculated on Page 3.
- The total Washington revenue credit from eligible resources is computed using the actual average REC price from WCA eligible resources (also calculated on Page 3) multiplied by the calculated pseudo excess RECs sold. This calculation is shown on lines 19-26.

Washington Utilities and Transportation Commission

May 24, 2011

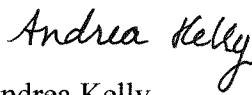
Page 8

RPS Non-Eligible RECs:

To the extent the Company is able to make sales of RPS non-eligible RECs in the future, the calculation of Washington's allocated share of the revenues will be done in the same manner as described above for RPS eligible RECs. Due to the limited size of the market for RPS non-eligible RECs, at this time, the Company does not forecast any sales in the future.

If you have any questions regarding this compliance filing, please contact me at (503) 813-6043.

Sincerely,

A handwritten signature in cursive script that reads "Andrea Kelly".

Andrea Kelly

Confidential Enclosures

Cc (w/Confidential Enclosures to Qualified Persons): All Parties of Record

CERTIFICATE OF SERVICE

I certify that I have cause to be served the foregoing document, via Overnight Delivery, to the following:

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The Energy Project

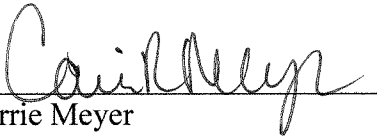
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DATED this 24th day of May, 2011


Carrie Meyer
Coordinator, Regulatory Operations

REDACTED CONFIDENTIAL ATTACHMENT 1

CY 2009 Renewable Energy Credits - Revenue

Resource	Control Area/Type	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Total
Ashton	Low Impact Hydro - East													
Bend	West Hydro													
Big Fork	East Hydro													
Blundell I	Blundell I													
Blundell II	Blundell II													
Clearwater 1	Low Impact Hydro - West													
Clearwater 2	Low Impact Hydro - West													
Condit	West Hydro													
Cutler	Low Impact Hydro - East													
Eagle Point	West Hydro													
East Side	West Hydro													
Fish Creek	Low Impact Hydro - West													
Foote Creek I	East Wind													
Fountain Green	East Hydro													
Glenrock I	East Wind													
Glenrock III	East Wind													
Goodhoe Hills	West Wind													
Granite	East Hydro													
Gunlock	East Hydro													
High Plains	East Wind													
Lea Chance	Low Impact Hydro - East													
Leaning Juniper	West Wind													
Manero	West Wind													
Manero II	West Wind													
McRadden Ridge	East Wind													
Mountain Wind I	East Wind													
Mountain Wind II	East Wind													
Olmstead	East Hydro													
Oreida	Low Impact Hydro - East													
Parls	East Hydro													
Pioneer	East Hydro													
Prospect 1	West Hydro													
Prospect 3	Low Impact Hydro - West													
Prospect 4	West Hydro													
Rock River I	East Wind													
Rolling Hills	Rolling Hills													
Sand Cove	East Hydro													
Seven Mile Hill I	East Wind													
Seven Mile Hill II	East Wind													
Slide Creek	Low Impact Hydro - West													
Snake Creek	East Hydro													
Soda	Low Impact Hydro - East													
Soda Springs	Low Impact Hydro - West													
Stairs	East Hydro													
Stato	East Hydro													
Vevo	East Hydro													
Viva Naughton	East Hydro													
Wabowa Falls	West Hydro													
Weber	East Hydro													
Wolverine Creek	East Wind													
Grand Total														\$ 51,006,690
Resource Subtotals														
East Wind														
Rolling Hills														
East Hydro														
Blundell I														
Blundell II														
Low Impact Hydro - East														\$ 28,693,426
Subtotal East														
West Wind														
West Hydro														\$ 22,313,263
Low Impact Hydro - West														\$ 51,006,690
Subtotal West														
Grand Total														\$ 50,793,765
CY 2009 Total Reflected on Company's Financial Reports														
Variance (primarily attributable to accrual-based accounting) \$ (21,924)														
Washington Allocation of West Revenues														
WA CAGW														\$ 4,939,889
Washington CAGW CY 2009 22.1368%														

CY 2009 Renewable Energy Credits - MWh

Resource	Control Area/Type	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Total
Ashon	Low Impact Hydro - East													
Bend	West Hydro													
Big Fork	East Hydro													
Blundell I	Blundell I													
Blundell II	Blundell II													
Cleanwater 1	Low Impact Hydro - West													
Cleanwater 2	Low Impact Hydro - West													
Condit	West Hydro													
Cutler	Low Impact Hydro - East													
Eagle Point	West Hydro													
Eagle Side	West Hydro													
Fish Creek	Low Impact Hydro - West													
Footle Creek I	East Wind													
Fountain Green	East Hydro													
Glenrock I	East Wind													
Glenrock II	East Wind													
Goodhoe Hills	West Wind													
Granite	East Hydro													
Gunlock	East Hydro													
High Plains	East Wind													
Last Chance	Low Impact Hydro - East													
Leaning Juniper	West Wind													
Marengo	West Wind													
Marengo II	West Wind													
McFadden Ridge	East Wind													
Mountain Wind	East Wind													
Mountain Wind II	East Wind													
Olmstead	East Hydro													
Orinda	Low Impact Hydro - East													
Palis	East Hydro													
Pioneer	East Hydro													
Prospect 1	West Hydro													
Prospect 3	Low Impact Hydro - West													
Prospect 4	West Hydro													
Rock River I	East Wind													
Rolling Hills	Rolling Hills													
Sand Cove	East Hydro													
Seven Mile Hill I	East Wind													
Seven Mile Hill II	East Wind													
Slide Creek	Low Impact Hydro - West													
Snake Creek	East Hydro													
Soda Springs	Low Impact Hydro - East													
Stairs	Low Impact Hydro - West													
Stairs	East Hydro													
Vevo	East Hydro													
Viva Naughton	East Hydro													
Wallowa Falls	West Hydro													
Weber	East Hydro													
Wichitane Creek	East Wind													
Grand Total														
Resource Subtotals														Total
East Wind														
Rolling Hills														
East Hydro														
Blundell I														
Blundell II														
Low Impact Hydro - East														
Subtotal East														
West Wind														
West Hydro														
Low Impact Hydro - West														
Subtotal West														
Grand Total														
Washington Allocation of West Revenues														
WA CAGW														
Washington CAGW CY 2009 22.1386%														

REDACTED CONFIDENTIAL ATTACHMENT 2

CY 2010 Renewable Energy Credits - Revenue

Resource	Control Area/Type	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Total
Ashton	Low Impact Hydro - East													
Bard	West Hydro													
Big Fork	East Hydro													
Blundell I	Blundell I													
Blundell II	Blundell II													
Campbell Hill	East Wind													
Chevron Casper Wind	East Wind													
Clearwater 1	Low Impact Hydro - West													
Clearwater 2	Low Impact Hydro - West													
Condit	West Hydro													
Copco 1	West Hydro													
Copco 2	West Hydro													
Cutter	Low Impact Hydro - East													
Eagle Point	West Hydro													
East Side	West Hydro													
Fall Creek	West Hydro													
Fish Creek	Low Impact Hydro - West													
Footie Creek I	East Wind													
Fountain Green	East Hydro													
Glenrock I	East Wind													
Glenrock III	East Wind													
Goodhope Hills	West Wind													
Granite	East Hydro													
Gunlock	East Hydro													
High Plains	East Wind													
Iron Gate	West Hydro													
Last Chance	Low Impact Hydro - East													
Leaning Juniper	West Wind													
Marango II	West Wind													
Marango III	West Wind													
McFadden Ridge	East Wind													
Mountain Wind I	East Wind													
Mountain Wind II	East Wind													
Olmstead	East Hydro													
Onelda	Low Impact Hydro - East													
Paris	East Hydro													
Pioneer	East Hydro													
Prospect 1	West Hydro													
Prospect 3	Low Impact Hydro - West													
Prospect 4	West Hydro													
Rock River I	East Wind													
Rolling Hills	Rolling Hills													
Sand Cove	East Hydro													
Seven Mile Hill I	East Wind													
Seven Mile Hill II	East Wind													
Slide Creek	Low Impact Hydro - West													
Snake Creek	East Hydro													
Soda	Low Impact Hydro - East													
Soda Springs	Low Impact Hydro - West													
Stairs	East Hydro													
Stairs	East Hydro													
Weyra	East Hydro													
Weyra Naughton	East Hydro													
Wetowa Falls	West Hydro													
Weber	East Hydro													
Wolverine Creek	East Wind													
Grand Total														\$ 99,863,591
Resource Subtotals														
East Wind														
Rolling Hills														
East Hydro														
Blundell I														
Blundell II														
Low Impact Hydro - East														
Subtotal East														\$ 65,362,472
West Wind														
West Hydro														
Low Impact Hydro - West														
Subtotal West														\$ 34,501,120
Grand Total														\$ 99,863,591
CY 2010 Total Reflected on Company's Financial Reports														
Variance (primarily attributable to accrual-based accounting) \$ 1,272,424														
Washington Allocation of West Revenues														
WA - CAGW														
Washington CAGW CY 2010 22.2111%														

CY 2010 Renewable Energy Credits - MWh

Resource	Control Area/Type	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Total
Ashton	Low Impact Hydro - East													
Bend	West Hydro													
Big Fork	East Hydro													
Blundell I	Blundell I													
Blundell II	Blundell II													
Campbell Hill	East Wind													
Chevron Casper Wind	East Wind													
Cleanwater 1	Low Impact Hydro - West													
Cleanwater 2	Low Impact Hydro - West													
Condit	West Hydro													
Copco 1	West Hydro													
Copco 2	West Hydro													
Cutler	Low Impact Hydro - East													
Eagle Point	West Hydro													
East Side	West Hydro													
Fall Creek	West Hydro													
Fish Creek	Low Impact Hydro - West													
Footie Creek I	East Wind													
Fountain Green	East Hydro													
Glenrock I	East Wind													
Glenrock III	East Wind													
Goodhope Hills	West Wind													
Granite	East Hydro													
Gunklock	East Hydro													
High Plains	East Wind													
Iron Gate	West Hydro													
Last Chance	Low Impact Hydro - East													
Leaning Juniper	West Wind													
Marango	West Wind													
Marango II	West Wind													
McFadden Ridge	East Wind													
Mountain Wind I	East Wind													
Mountain Wind II	East Wind													
Olmstead	East Hydro													
Oneida	Low Impact Hydro - East													
Paris	East Hydro													
Pioneer	East Hydro													
Prospect 1	West Hydro													
Prospect 3	Low Impact Hydro - West													
Prospect 4	West Hydro													
Rock River I	East Wind													
Rolling Hills	Rolling Hills													
Sand Cove	East Hydro													
Seven Mile Hill	East Hydro													
Seven Mile Hill II	East Wind													
Slide Creek	Low Impact Hydro - West													
Slate Creek	East Hydro													
Soda	Low Impact Hydro - East													
Soda Springs	Low Impact Hydro - West													
Stans	East Hydro													
Vero	East Hydro													
Viva Naughton	East Hydro													
Waltowa Falls	West Hydro													
Weber	East Hydro													
Wolverine Creek	East Wind													
Grand Total														
Resource Subtotals														
East Wind														
Rolling Hills														
East Hydro														
Blundell I														
Blundell II														
Low Impact Hydro - East														
Subtotal East														
West Wind														
West Hydro														
Low Impact Hydro - West														
Subtotal West														
Grand Total														

Washington Allocated

WA CAGW

Washington CAGW CY 2010

22.2111%

REDACTED CONFIDENTIAL ATTACHMENT 3

REDACTED CONFIDENTIAL ATTACHMENT 4

Renewable Energy Credit Tracking Mechanism
 Summary of Forecast Revenue Credit

	Forecast Jan - Mar 2011	Forecast Apr - Dec 2011	Forecast Jan - Mar 2012	Forecast Apr - Dec 2012	Forecast 2013	Forecast 2014
1 REC Revenue Credit - RPS Eligible Resources						
2						
3 REC Revenue Credit - RPS Non-Eligible Resources						
4						
5 Total Revenue Credit						
	Rate Year (UE 100749)					

Page 2, Line 26

Page 4, Line 43

Line 1 + Line 3

Renewable Energy Credit Tracking Mechanism
Calculation of Revenue Credit From Washington RPS Eligible Resources

	Forecast		Forecast		Forecast		Forecast		Forecast	
	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	Jan - Mar 2012	Apr - Dec 2012	Jan - Mar 2013	Apr - Dec 2013	Jan - Mar 2014	Apr - Dec 2014
West Control Area Eligible Generation										
1 LEANING JUNIPER I										
2 GOODNOE HILLS										
3 MARENGO										
4 MARENGO II										
5 Total Generation										
6										
West Control Area Allocation Factor (CAGW)										
7 Washington										
8										
9										
10 Allocation of Generated RECs (WCA - CAGW Factor)										
11 Washington										
12										
13 Washington RPS Compliance Requirement (1)										
14										
15 Actual RECs Available (Revised Protocol)										
16 Required Below-the-Line Purchase to Meet Compliance										
17 Actual RECs Available for Washington Compliance										
18										
19 Pseudo RECs in Excess of Compliance Req.										
20										
21 Calculation of Revenue Credit to Customers										
22 % of RECs Available for Sale Actually Sold (2)										
23										
24 Pseudo Excess RECs Considered Sold										
25 Average Price per MWh (2)										
26 REC Revenue Credit - RPS Eligible Resources										

Line 5 * Line 8
Table Below
Page 3, Line 20
Line 18 - Line 20
Line 11 - Line 17
Page 3, Line 69
Line 19 * Line 22
Page 3, Line 68
Line 24 * Line 25

Washington Retail Sales	MWh
Calendar Year 2010 (Actual)	3,984,631
Calendar Year 2011 (Forecast)	
Calendar Year 2012 (Forecast)	
Calendar Year 2013 (Forecast)	
Calendar Year 2014 (Forecast)	

Washington RPS Compliance Requirements	MWh	Reference
1/1/12 - 3% (2011 Generation Eligible for Compliance)		3% of Average 2010 and 2011 Retail Sales
1/1/13 - 3% (2012 Generation Eligible for Compliance)		3% of Average 2011 and 2012 Retail Sales
1/1/14 - 3% (2013 Generation Eligible for Compliance)		3% of Average 2012 and 2013 Retail Sales
1/1/15 - 3% (2014 Generation Eligible for Compliance)		3% of Average 2013 and 2014 Retail Sales

Notes:
1. The 2011 and 2012 RPS compliance requirements shown on line 13 have been split on a pro rata basis by the number of months reflected in each of the respective columns. For example, the "Jan-Mar 2011" column reflects 3/12ths of the January 1, 2012 compliance requirement.
2. The percentage of sales (line 22) and average price per REC (line 25) shown in the 2013 and 2014 columns have been calculated based on the forecast averages for CY 2012. These amounts are shown in the table above for illustrative purposes only. Prices in this period are uncertain and extremely speculative.

Renewable Energy Credit Tracking Mechanism
REC Transaction Summary from Washington RPS Eligible Resources

	West Control Area RPS Eligible Generation (MWh)	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast
		Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
1	LEANING JUNIPER I						
2	GOODNOE HILLS						
3	MARENGO						
4	MARENGO II						
5	Total Generation						
6							
	Revised Protocol (RP) Allocation Factors (SG)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
8	California						
9	Oregon						
10	Washington						
11	Idaho						
12	Utah						
13	Wyoming						
14	FERC						
15	Total	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%
16							
	State Alloc. of RPS Eligible RECs (MWh) - (RP)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
18	California						
19	Oregon						
20	Washington						
21	Idaho						
22	Utah						
23	Wyoming						
24	FERC						
25	Total						
26							
	RECs Eligible for State RPS (MWh)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
28	California						
29	Oregon						
30	Washington						
31	Idaho						
32	Utah						
33	Wyoming						
34	FERC						
35	Total						
36							
	RECs Available for Sale (MWh)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
38	California						
39	Oregon						
40	Washington						
41	Idaho						
42	Utah						
43	Wyoming						
44	FERC						
45	Total						
46							
	Forecast RECs Sales (MWh)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
48	California						
49	Oregon						
50	Washington						
51	Idaho						
52	Utah						
53	Wyoming						
54	FERC						
55	Total						
56							
	RECs Retained (MWh)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
58	California						
59	Oregon						
60	Washington						
61	Idaho						
62	Utah						
63	Wyoming						
64	FERC						
65	Total						
66							
67	Total Revenues from REC Sales (1)						
68	Average Price						
69	% of RECs Available for Sale Actually Sold						

Line 5 * Line 8
Line 5 * Line 9
Line 5 * Line 10
Line 5 * Line 11
Line 5 * Line 12
Line 5 * Line 13
Line 5 * Line 14

Line 18
Line 19
Line 20

Line 18 - Line 28
Line 19 - Line 29
Line 20 - Line 30
Line 21 - Line 31
Line 22 - Line 32
Line 23 - Line 33
Line 24 - Line 34

Attach 3, Page 2

Line 38 - Line 48
Line 39 - Line 49
Line 40 - Line 50
Line 41 - Line 51
Line 42 - Line 52
Line 43 - Line 53
Line 44 - Line 54

Attach 3, Page 1
Line 67 / Line 55
Line 55 / Line 45

Note:

1. The revenues shown in the 2013 and 2014 columns have been calculated based on the forecast average for CY 2012. These amounts are shown in the table above for illustrative purposes only. Prices in this period are uncertain and extremely speculative.

Renewable Energy Credit Tracking Mechanism
 Calculation of Revenue Credit From Washington RPS Non-Eligible Resources

	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast
	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
West Control Area RPS Non-Eligible Generation						
1 BEND						
2 CLEARWATER 1						
3 CLEARWATER 2						
4 CLINE FALLS						
5 CONDIT						
6 COPCO 1						
7 COPCO 2						
8 EAGLE POINT						
9 EAST SIDE						
10 FALL CREEK						
11 FISH CREEK						
12 IRON GATE						
13 JC BOYLE						
14 LEMOLO 1						
15 LEMOLO 2						
16 MERWIN						
17 PROSPECT 1						
18 PROSPECT 2						
19 PROSPECT 3						
20 PROSPECT 4						
21 POWERDALE						
22 ROSEBURG FOREST PRODUCTS						
23 SLIDE CREEK						
24 SODA SPRINGS						
25 SWIFT 1						
26 TOKETEE						
27 WALLOWA FALLS						
28 WEST SIDE						
29 YALE						
30 Total Generation						
31						
32 West Control Area Allocation Factor (CAGW)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
33 Washington						
34						
35 Allocation of Generated RECs (WCA - CAGW Factor)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
36 Washington						
37						
38 Calculation of Revenue Credit to Customers						
39 % of Non-Eligible RECs Available for Sale Actually Sold (1)						
40						
41 Washington Allocation Considered Sold						
42 Average Price per MWh (1)						
43 REC Revenue Credit - RPS Non-Eligible Resources						

Line 30 * Line 33

Page 4, Line

Line 36 * Line 39

Page 4, Line

Line 41 * Line 42

Renewable Energy Credit Tracking Mechanism
REC Transaction Summary from Washington RPS Non-Eligible Resources

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in WUTC Docket No. UE-100749
Page 5 of 5

	West Control Area RPS Non-Eligible Generation	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast
		Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
1	BEND						
2	CLEARWATER 1						
3	CLEARWATER 2						
4	CLINE FALLS						
5	CONDIT						
6	COPCO 1						
7	COPCO 2						
8	EAGLE POINT						
9	EAST SIDE						
10	FALL CREEK						
11	FISH CREEK						
12	IRON GATE						
13	JC BOYLE						
14	LEMOLO 1						
15	LEMOLO 2						
16	MERWIN						
17	PROSPECT 1						
18	PROSPECT 2						
19	PROSPECT 3						
20	PROSPECT 4						
21	POWERDALE						
22	ROSEBURG FOREST PRODUCTS						
23	SLIDE CREEK						
24	SODA SPRINGS						
25	SWIFT 1						
26	TOKETEE						
27	WALLOWA FALLS						
28	WEST SIDE						
29	YALE						
30	Total Generation						
37							
38	Revised Protocol (RP) Allocation Factors (SG)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
39	California						
40	Oregon						
41	Washington						
42	Idaho						
43	Utah						
44	Wyoming						
45	FERC						
46	Total	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%
47							
48	State Alloc. of RPS Eligible RECs (MWh) - (RP)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
49	California						
50	Oregon						
51	Washington						
52	Idaho						
53	Utah						
54	Wyoming						
55	FERC						
56	Total						
57							
58	RECs Eligible for State RPS (MWh)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
59	California						
60	Oregon						
61	Washington						
62	Idaho						
63	Utah						
64	Wyoming						
65	FERC						
66	Total						
67							
68	RECs Available for Sale (MWh)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
69	California						
70	Oregon						
71	Washington						
72	Idaho						
73	Utah						
74	Wyoming						
75	FERC						
76	Total						
77							
78	Forecast RECs Sales (MWh)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
79	California						
80	Oregon						
81	Washington						
82	Idaho						
83	Utah						
84	Wyoming						
85	FERC						
86	Total						
87							
88	RECs Retained (MWh)	Jan - Mar 2011	Apr - Dec 2011	Jan - Mar 2012	Apr - Dec 2012	2013	2014
89	California						
90	Oregon						
91	Washington						
92	Idaho						
93	Utah						
94	Wyoming						
95	FERC						
96	Total						
97							
98	Total Revenues from REC Sales						
99	Average Price						
100	% of RECs Available for Sale Actually Sold						

Line 30 * Line 39
Line 30 * Line 40
Line 30 * Line 41
Line 30 * Line 42
Line 30 * Line 43
Line 30 * Line 44
Line 30 * Line 45

State Specific RPS Elig.
State Specific RPS Elig.

Line 49 - Line 59
Line 50 - Line 60
Line 51 - Line 61
Line 52 - Line 62
Line 53 - Line 63
Line 54 - Line 64
Line 55 - Line 65

Attach 3, Page 2 (WCA)

Line 69 - Line 79
Line 70 - Line 80
Line 71 - Line 81
Line 72 - Line 82
Line 73 - Line 83
Line 74 - Line 84
Line 75 - Line 85

Attach 3, Page 1 (WCA)
Line 98 / Line 86
Line 86 / Line 76