

Exhibit No. ___ (APB-6)
Docket Nos. UE-050684 and UE-050412
Witness: Alan P. Buckley

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFICORP, d/b/a Pacific Power &
Light Company, Respondent.**

**In the Matter of the Petition of
PacifiCorp, d/b/a Pacific Power & Light
Company for an Order Approving
Deferral of Costs Related to Declining
Hydro Generation**

DOCKET NO. UE-050684

DOCKET NO. UE-050412

**EXHIBIT TO
TESTIMONY OF**

ALAN P. BUCKLEY

**For
STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

**PacifiCorp's Response to
Public Counsel Data Request No. 96
(without attachment)**

November 3, 2005

PC Data Request 96

Please provide any studies that could be used to estimate the amount, direction and/or timing of net power flows between PacifiCorp's eastern and western control areas during periods when the Currant Creek power plant is operating. In addition, please provide any studies that could be used to identify the amount, direction and/or timing of net power flows between PacifiCorp's eastern and western control areas during periods when other PacifiCorp's new resources are operating.

Response to PC Data Request 96

PacifiCorp objects to this request on the grounds that it is overly broad and unduly burdensome. Without waiving this objection, PacifiCorp responds as follows:

On July 25, 2005, the Company clarified with Public Counsel that "other PacifiCorp's new resources" means the Currant Creek, Gadsby peakers, West Valley, and purchases from Deseret, Kennecott, US Magnesium, Tesoro and Desert Power.

The GRID study sponsored by Mr. Widmer in this case can be used to estimate the amount, direction and/or timing of net transfers between PacifiCorp's eastern and western control areas when the Currant Creek power plant or any other new resource is operating. Attachment PC 96, on the enclosed CD, provides the GRID generated hourly transfers between control areas for the test period, as well as the hourly generation from each of the referenced resources.

Responder: Gregory N. Duvall
Witness: Gregory N. Duvall

WASHINGTON
UE-505684
GENERAL RATE CASE
PACIFICORP
PC STAFF DATA REQUEST
ATTACHMENT PC 96
ON THE ENCLOSED CD