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November 14, 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: In the Matter of WUTC v. PacifiCorp d/b/a Pacific Power & Light Company
Docket UE-100749
Bench Requests 4-8**

PacifiCorp, d.b.a. Pacific Power & Light Company, submits for filing an original and seventeen (17) copies of its Responses to Bench Requests 4-8 in the above referenced proceeding.

The Company respectfully requests that all formal correspondence and data requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Sincerely,

Andrea L. Kelly
Vice President, Regulation

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

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

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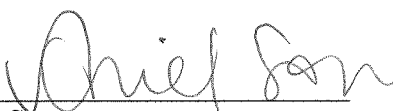
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DATED this 14th of November, 2011



Ariel Son
Coordinator, Regulatory Operations

Bench Request Data Request 4

The Company makes a “correction” to Commission Staff’s imputation of small hydro Renewable Energy Credit (REC) revenues. (Dalley, Exh. No. RBD-28CT at 15:7-14). The dollar amount of the Company’s “correction” is reflected in Dalley, Exh. No. RBD-29C at 7.

- a. Please identify the inputs and provide the calculation used to derive the dollar amount reflected in Dalley, Exh. No. RBD-29C at 7.
- b. For the calculation of non-Washington eligible RECs, please explain the rationale for grouping (or not grouping) non-Washington eligible small hydro RECs with other non-Washington eligible RECs.

Response to Bench Request Data Request 4

- a. Please refer to Confidential Attachment Bench Request 4 for the workpapers used to derive the correction values shown at Exhibit No.__(RBD-29C) at 7.
- b. As shown on page 1, line 7 of Exhibit No.__(RBD-29C), the Company’s calculation of Washington’s allocated share of Washington non-eligible REC revenues includes all RECs generated from Washington non-eligible renewable resources in the west control area. Excluding certain non-eligible resources would not provide a full perspective of all REC transactions (generated, held/ banked, or sold) during the respective periods.

Staff’s non-eligible calculation includes only RECs from Washington non-eligible resources that were sold during 2009 or 2010. Staff’s approach incorrectly assumes that there will never be a market in which to sell the RECs from the other resources. Using Staff’s approach, the resources used in the calculation could change each year depending on which RECs were sold by the Company. This would potentially mean that some resources would be included in the non-eligible calculation in some years and excluded in others. The Company’s approach avoids this problem by including all Washington non-eligible RECs in the west control area in the calculation for each year.

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: R. Bryce Dalley / Stacey J. Kusters

SPONSOR: R. Bryce Dalley / Stacey J. Kusters

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Bench Request Data Request 5

Bench Request Data Request 5

The Company presents its calculation of its proposed tracker mechanism in Dalley, Exh. No. RBD-27C at 2. Please confirm that subtracting line 13 from line 11 results in the same numerical value as that presented in line 19.

Response to Bench Request Data Request 5

Confirmed. Subtracting line 13 from line 11 equals the value shown on line 19.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

Bench Request Data Request 6

For each time period listed in Dalley, Exh. No. RBD-27C at 2, please explain how revenues from West Control Area RECs generated, but not sold, in a previous period would be recognized when sold. The response should include an explanation of the price and any allocation factor used for converting those REC sales to Washington revenues.

Response to Bench Request Data Request 6

To the extent west control area RECs are sold in a period after the Washington allocation of revenues for that period has already been determined, a recalculation of the previous year's Washington-allocated revenue would be performed. Using this methodology, any REC sale for RECs generated from April 2011 forward would be reflected in the calculation of Washington-allocated revenues and included in the REC tracking mechanism.

For example, if during 2012 the Company sells a REC generated in June 2011 after the Company had already determined Washington's share of April 2011 through December 2011 REC revenue, the Company would recalculate Washington's allocation of REC revenue for that period (April 2011 through December 2011). The variance from the recalculated total and the amount originally calculated would be included in the REC tracking account and detailed in the Company's annual filing.

In performing this recalculation, all variables impacted by the sale of RECs would be updated. In other words, the calculations shown on page 3 of Exhibit No.__(RBD-27C) would be updated to include revisions to the number of RECs sold (lines 47-55), the number of RECs retained (lines57-65), the total revenues (line 67), the average price (line 68), and the percentage of RECs available for sale actually sold (line 69). The impact of these revisions will result in a revised REC revenue amount for that period.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

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Bench Request Data Request 7

Bench Request Data Request 7

Commission Staff's Exhibit, Breda, Exh. No. KHB-8C at 1:20, calculates "Wind RECs Held for Compliance in Oregon and California" based on a Company response to a Data Request.

Please provide the number of these RECs retired prior to April 2, 2011. The response should include the following information:

Please provide the supporting documentation, such as the Renewable Portfolio Standards (RPS) compliance filings and Western Renewable Energy Generation Information System reports.

Response to Bench Request Data Request 7

Please refer to Confidential Attachment Bench Request 7 -1 (tab "California") for the number of Western Renewable Energy Generation Information System (WREGIS) certificates that PacifiCorp has retired for the California RPS program, associated with the west control area wind resources Goodnoe Hills, Leaning Juniper, Marengo and Marengo II

The Company has not yet filed a compliance report or retired WREGIS certificates for the Oregon RPS program. The Company intends to file its initial RPS compliance report with the Oregon Public Utility Commission on June 1, 2012. Please refer to Confidential Attachment Bench Request 7 -1 (tab "Oregon") for the number of WREGIS certificates (2009 vintage and 2010 vintage) that PacifiCorp has set aside, associated with the west control area wind resources Goodnoe Hills, Leaning Juniper, Marengo and Marengo II

Please refer to Confidential Attachment Bench Request 7 -2 for supporting WREGIS reports associated with the WREGIS certificates that were retired for California RPS, and those being held for compliance for the Oregon RPS.

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: Teri Ikeda / Kristie Sharp

SPONSOR: To Be Determined

Bench Request Data Request 8

Commission Staff's Exhibit, Breda, Exh. No. KHB-8C at 1:20 calculates "Wind RECs Held for Compliance in Oregon and California" based on a Company response to a Data Request.

For *each time period* (except January – March 2011) listed in Dalley, Exh. No. RBD-27C at 2, please explain how to impute revenues for Washington's WCA RECs held for compliance in Oregon and California which either were retired or are to be retired.

Response to Bench Request Data Request 8

Staff's calculation of imputed revenue for RECs held for compliance in California and Oregon has been done for 2009 and 2010 only. This calculation, as described by Staff witness Kathryn H. Breda in Exhibit No.__(KHB-7TC) takes the number of RECs held for compliance in California and Oregon and multiplies the total by the percentage of actual RECs sold by the Company. The product of this calculation is then multiplied by an average price per REC. That total is then multiplied by the Washington control area generation west (CAGW) allocation factor to determine Washington's share of the imputed revenues. The imputed revenues are then added to Washington's allocation of booked revenues to determine Washington's total REC revenue allocation.

Beginning in January 2011, eligible RECs generated in the west control area can be used to satisfy the January 1, 2012 Washington renewable portfolio standard (RPS) requirement. This means the Company will be holding California, Oregon, and Washington RECs for compliance.

Because of this additional complexity, the Company's proposal for 2011 forward as outlined in Exhibit No.__(RBD-27C) accounts for RECs held for compliance in a different manner than Staff's proposal for 2009 and 2010. Staff has not explained how its approach for 2009 and 2010 could be applied to 2011 and beyond so the Company is unable to apply Staff's method to these time periods. The Company's proposal for 2011 forward is generally consistent with approach presented by Public Counsel/ICNU in its calculation of 2009 and 2010 revenues, with the exception of the corrections discussed in the phase II rebuttal testimony of Company witness R. Bryce Dalley.

The Company's proposal calculates Washington's share of revenues by using Washington's full CAGW share of RECs generated from west control area resources less the number of RECs held for Washington compliance. As a result, RECs held for compliance in other states do not effect Washington's allocation of REC revenue. Washington's allocation of RECs not used to comply with the Washington RPS (page 2, line 19) are multiplied by the percentage of actual RECs sold (page 2, line 22). This total is then multiplied by an average price (page 2, line 25) to determine Washington total share of revenues (page 2, line 26). This method is used for all time periods shown in Exhibit No.__(RBD-27C).

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Bench Request Data Request 8

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley