Exhibit No. \_\_\_(MPG-17) Docket Nos. UE-050684/UE-050412 Witness: Michael P. Gorman

## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

	)
WASHINGTON UTILITIES AND	)
TRANSPORTATION COMMISSION,	)
	) <b>Docket No. UE-050684</b>
Complainant,	)
	) <b>Docket No. UE-050412</b>
VS.	)
	) (consolidated)
PACIFICORP d/b/a PACIFIC POWER &	)
LIGHT COMPANY	)
	)
Respondent.	)

EXHIBIT NO.\_\_(MPG-17)

PACIFICORP RESPONSE TO STAFF DATA REQUEST NO. 87

**November 3, 2005** 

## **WUTC Staff Data Request 87**

On page 3, lines 1-9 of his direct, Mr. Williams page 3 lines 1-9 shows the proposed capital structure of PacifiCorp for rate making purposes. (Exhibit \_\_\_\_\_ BNW-1T). As part of the general information provided by the Company pursuant to Chapter 480-07 WAC, is a document entitled "Scottish Power Annual Report of Accounts 2003/2004."

- a. Please calculate the actual capital structure of Scottish Power using the financial information in the "Scottish Power Annual Report of Accounts 2003/2004." Specifically identify by page number all figures used in the capital structure calculation.
- b. Please separately identify all current maturities and all short-term debt appearing on Scottish Power's financial statements, and state where these amounts are included in the calculation of total debt outstanding.

## 1<sup>st</sup> Supplemental Response to WUTC Staff Data Request 87

- a. The capital structure of the ScottishPower Group at March 31, 2004 is provided as Attachment WUTC 87 a 1<sup>st</sup> Supplemental. The capital structure is based on the ScottishPower Group balance sheet found on page 94 of the 2003/2004 Annual Report of Accounts.
- b. ScottishPower Group current liabilities appear on pp 109-110 of the Annual Report of Accounts. These amounts also appear in Attachment WUTC 87 a 1<sup>st</sup> Supplemental.

Responder: Karl Anderberg Witness: Karl Anderberg

## Scottish Power plc

Group capital structure at 31 March 2004

(All figures in millions of pounds sterling)

	_	%
Short-term debt (including current maturities of long-term debt	410.7	4.21%
Long-term debt	4,661.1	47.74%
Total debt	5,071.8	51.95%
Preferred equity	0.0	0.00%
Common equity (including retained earnings)	4,690.9	48.05%
	9,762.7	100.00%

All of the above figures appear on page 94 of the Scottish Power plc Annual Report and Accounts 2003/04