BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

EXHIBIT NO.__(MPG-18)

PACIFICORP RESPONSE TO STAFF DATA REQUEST NO. 41

November 3, 2005

UE-050684/PacifiCorp June 30, 2005 WUTC Staff Data Request 41 1st Supplemental

WUTC Staff Data Request 41

- a. Please explain why Mr. Williams did not include short-term debt in the overall cost of capital computation shown on page 3 of his Direct Testimony (Exhibit No. (BNW-1T)).
- Testimony (Exhibit No. ___ (BNW-1T)).

 b. Please show what the table on page 3 of Mr. William's Direct Testimony (Exhibit No. ___ (BNW-1T)) would look like if short-term debt were included.

1st Supplemental Response to WUTC Staff Data Request 41

- a. The Company's practice is to exclude short-term debt when calculating capital structure and cost of capital in regulatory proceedings. This is the same method that the Company utilized in the prior Washington General rate Case, Docket No. UE-032065, and general rate cases in other states.
- b. Please refer to Attachment WUTC 41 b 1st Supplemental.

Responder: Bruce Williams Witness: Bruce Williams

PacifiCorp Domestic Electric Docket No. UE-050684 Attachment WUTC 41 b 1st supplemental

	Pro Forma 3/31/06					
		Amount	Cap %	Cost	WACC	
Short-Term Debt	\$	148,385	1.8%	4.330%	0.078%	
Long-Term Debt	\$ 4,	,011,708	48.5%	6.427%	3.117%	
Preferred Equity	\$	90,213	1.1%	6.590%	0.072%	
Common Equity	\$4,	020,743	48.6%	11.125%	5.407%	
Total	\$8,	271,049	100.0%		8.674%	