

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

EXHIBIT NO. ____ (RJF-15)

PACIFICORP RESPONSE TO ICNU DATA REQUEST 2.1

November 3, 2005

ICNU Data Request 2.1

For the new Gadsby Combustion turbines, please provide the following information:

- a. Capital cost included in rate base in the test year.
- b. Depreciation expense included in the test year.
- c. O&M expense included in the test year.
- d. Property taxes included in the test year.
- e. Transmission cost benefits reflected in the test year.
- f. Overall revenue requirements included in the test year.
- g. An explanation for assuming that the Gadsby CTs are a prudent investment.
- h. A calculation showing the amount of ancillary benefits associated with the Gadsby CTs that are reflected in the test year power costs.

Response to ICNU Data Request 2.1

- a. The total company Capital cost included in rate base is \$75,256,978, using a 13 month average of average to calculate rate base.
- b. The total company depreciation expense is \$3,213,173.
- c. As of Fiscal Year 2004, O&M expense is not tracked specifically for the Gadsby peaking units; therefore, we are not able to quantify an amount of O&M for the units.
- d. Property taxes are calculated for the entire system and are not assigned to specific plants.
- e. Based on three-eighths of the LADWP transmission contract which was not renewed, the value is estimated at \$7,322,130.
- f. The overall revenue requirement on a total company basis is 9,801,169.
- g. Attachments ICNU 2.1 g-1 through ICNU 2.1 g-4, found on the enclosed CD, are the testimony and exhibits of Company witness J. Rand Thurgood in Utah Docket No. 01-035-37. These provide an explanation of why Gadsby was a prudent investment. Also, refer to Attachment ICNU 2.1g-5 on the enclosed CD, which is Mr. Thurgood's testimony in the Utah rate proceeding, Docket No. 03-2035-02.
- h. The Company has not performed such a study for the FY 2007 pro forma time period used for net power costs in this proceeding.

Responder: Mark T. Widmer
Witness: Mark T. Widmer

ICNU Data Request 2.2

For the new West Valley Combustion turbines, please provide the following information:

- a. Lease expenses included in the test year.
- b. O&M expense included in the test year.
- c. Property taxes included in the test year.
- d. Transmission cost benefits reflected in the test year.
- e. Overall revenue requirements included in the test year.
- f. An explanation for assuming that the West Valley CTs are a prudent investment.
- g. A calculation showing the amount of ancillary benefits associated with the West Valley CTs that are reflected in the test year power costs.

Response to ICNU Data Request 2.2

- a. The lease expense is \$15,486,960, Total Company.
- b. The non-fuel O&M expense is \$1,927,240, Total Company.
- c. Property Taxes are \$1,530,849, Total Company.
- d. Based on five-eighths of the LADWP transmission contract which was not renewed, the value is estimated at \$12,203,550.
- e. The overall revenue requirement on a Total Company basis is \$18,945,049.
- f. An explanation is provided in the testimonies and exhibits of Mr. Klein and Mr. Tallman in Docket UE 134, which have been provided in response to ICNU 2.36. In addition, see also PPL Exhibit MRT-1T, pages 2 – 16, the testimony of Mark R. Tallman, in the current proceeding.
- g. The Company has not performed such a study for the FY 2007 pro forma time period used for net power costs in this proceeding.

Responder: Mark T. Widmer
Witness: Mark T. Widmer

ICNU Data Request 7.5

For the new Currant Creek plant, please provide the following information:

- a. Capital cost included in rate base in the test year.
- b. Depreciation expense included in the test year.
- c. O&M expense included in the test year.
- d. Property taxes included in the test year.
- e. Transmission cost benefits reflected in the test year.
- f. Overall revenue requirements included in the test year.
- g. An explanation for assuming that Currant Creek was a prudent investment.
- h. A calculation showing the amount of ancillary benefits associated with Currant Creek that are reflected in the test year power costs.
- i. Any evidence that demonstrates that electricity generated at Currant Creek is used by retail customers in Washington.

Response to ICNU Data Request 7.5

- a. Total Company: \$347,263,121; Washington Allocated: \$29,430,197
- b. Total Company: \$12,385,495; Washington Allocated: \$1,049,665
- c. Total Company: \$394,939; Washington Allocated: \$32,635
- d. Property taxes are calculated for the entire system and are not assigned to specific plants.
- e. There are no transmission cost benefits identified in the test period.
- f. Total Company: \$43,179,848; Washington Allocated: \$3,658,619
- g. See direct testimony filed by PacifiCorp in Utah PSC Docket No. 03-035-29-Currant Creek; this is provided as Attachment ICNU 7.5 g on the enclosed CD.
- h. The requested information is provided as Attachment ICNU 7.5 h on the enclosed CD.
- i. Electricity generated at Currant Creek is used by retail customers in Washington in the sense that all generation on-line at a particular time supports all loads throughout the Western Interconnection. This has been evidenced many times during

UE-050684/PacifiCorp
September 26, 2005
ICNU 7th Set Data Request 7.5

events of any generation outage temporarily causing decreases in system frequency throughout the Western Interconnection. Please refer to the Direct Testimony of Gregory N. Duvall, pages 29-44.

Responder: Paul M. Wrigley/Mark R. Tallman
Witness: Paul M. Wrigley/Mark R. Tallman