

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

**PACIFICORP d/b/a Pacific Power & Light Company
Docket Nos. UE-050684/UE-050412**

Public Counsel Response to Bench Request No. 11

TO PUBLIC COUNSEL:

BENCH REQUEST NO. 11:

Please provide work papers similar to Exhibit No. ___(PMW-8), Page 2.2 and Exhibit No. ___(PMW-7) showing each of the adjustments you sponsor or do not contest for purposes of calculating the revenue requirement for your case.

RESPONSE:

See attached spreadsheets and schedules. Public Counsel reserves the right to make a final statement of position with regard to revenue requirement adjustments until the closure of the hearing record and filing of its final brief in this case.

Responder: David Effron, (203) 431-3012.

Schedule A1

PACIFICORP - WASHINGTON
 REVENUE REQUIREMENT SUMMARY
 (\$000)

	(1) Company Position	PC Adjustments		Proposed Position
Adjusted Operating Income	\$ 30,602	\$ 3,897	(2)	\$ 34,499
Rate Base	<u>615,154</u>	<u>(48,280)</u>	(2)	<u>566,874</u>
Earned Return on Rate Base	4.97%			6.09%
Proposed Rate of Return	<u>8.75%</u>		(3)	<u>7.51%</u>
Additional Income Required	23,250	(15,161)		8,090
Gross Revenue Conversion Factor	<u>1.6862</u>	<u>-</u>	(4)	<u>1.6862</u>
Revenue Deficiency (Excess)	<u>\$ 39,205</u>	<u>\$ (25,564)</u>		<u>\$ 13,641</u>

Sources:

- (1) Exhibit PMW-3, Page 1.1 - Total Adjusted Results
- (2) Schedule A2
- (3) Testimony of Mr. Hill
- (4) Exhibit PMW-3, Page 1.2

Note: *This schedule shows the total effect of the adjustments proposed in the testimony of PC witness Effron and the effect of the rate of return proposal of PC witness Hill.*

Schedule A2

PACIFICORP - WASHINGTON
 ISSUES SUMMARY
 (\$000)

	<u>Source</u>	<u>Effect on Rate Base</u>	<u>Effect on Operating Income</u>	<u>Effect on Revenue Requirement</u>
Miscellaneous Deferred Debits	(A)	\$ (7,597)	\$ 985	\$ (2,782)
Acquisition Premium	(B)	(7,969)	293	(1,671)
Major Plant Additions	(C)	(31,163)	281	(5,074)
Out of Period Revenue Adjustment	(D)		853	(1,439)
Amortization of Capital Stock Expense	(E)		106	(179)
Incentive Compensation	(F)		581	(979)
IRS Tax Settlement	(G)	(1,551)	388	(883)
Income Tax Calculation	(H)		438	(739)
Interest Synch. Effect - Rate Base	(I)		(582)	981
Interest Synch. Effect - Cap. Structure	(J)	<u>-</u>	<u>553</u>	(933)
Totals		(48,280)	3,897	
Rate of Return				<u>(11,866)</u>
Total Revenue Requirement Effect of Issues				<u>\$ (25,564)</u>

Sources:

(A)	Schedule DJE -2.1			
(B)	Schedule DJE -2.2			
(C)	Schedule DJE -2.3			
(D)	PMW-3 Page 3.3.2	1,439*	59305	
(E)	PMW-3 Page 4.1	171*	62.05%	
(F)	Schedule DJE -2.4			
(G)	PMW-3 Page 7.4			
(H)	Schedule DJE -2.5			
(I)	Total of Rate Base Adjustments	\$ (48,280)		
	Weighted Cost of Debt	<u>3.175%</u>		PMW-3, Page 2.1
	Synchronized Interest Expense	(1,533)		
	Income Tax Rate	<u>37.95%</u>		PMW-3, Page 2.1
	Income Tax Expense	<u>\$ 582</u>		
(J)	Adjusted Rate Base	566,874		
	Increase to Weighted Debt Cost	<u>0.26%</u>		Testimony of Mr. Hill
	Synchronized Interest Expense	1,457		
	Income Tax Rate	<u>37.95%</u>		PMW-3, Page 2.1
	Income Tax Expense	<u>\$ (553)</u>		

Effect of Attorney General Rate Base and Operating Income Adjustments Incremental Effect of Proposed Adjustments

Operating Revenues:		
General Business Revenues	220,279,183	220,279,183
Interdepartmental		
Special Sales	66,195,696	66,195,696
Other Operating Revenues	5,830,462	5,830,462
Total Operating Revenues	292,305,340	292,305,340

Operating Expenses:		
Steam Production	59,580,062	59,580,062
Nuclear Production		
Hydro Production	3,311,553	3,311,553
Other Power Supply	86,040,182	86,040,182
Transmission	9,676,055	9,676,055
Distribution	13,758,365	13,758,365
Customer Accounting	7,952,082	7,952,082
Customer Service & Info	476,617	476,617
Sales	4,662	4,662
Administrative & General	20,683,067	(1,106,650)
Total O&M Expenses	201,482,647	(1,106,650)
Depreciation	31,266,029	(144,750)
Amortization	5,038,891	(473,000)
Taxes Other Than Income	5,477,913	-
Income Taxes: Federal	2,995,270	301,645
State	730,609	(290,733)
Deferred Income Taxes	12,508,941	(388,000)
Investment Tax Credit Adj.	(404,369)	-
Misc Revenue & Expense		-
Total Operating Expenses:	259,095,931	(2,101,488)
Operating Rev For Return:	33,209,409	2,101,488

Rate Base:		
Electric Plant In Service	1,134,495,894	(4,556,654)
Plant Held for Future Use	103,004	-
Misc Deferred Debits	10,194,634	(3,192,969)
Elec Plant Acq Adj	7,969,300	(7,969,000)
Nuclear Fuel		-
Prepayments	2,022,441	-
Fuel Stock	4,242,137	-
Material & Supplies	7,538,018	-
Working Capital	4,423,879	-
Weatherization Loans	795,339	-
Misc Rate Base	57,761	-

Total Electric Plant:	1,171,842,408	(15,718,623)	1,156,123,785
Deductions:			
Accum Prov For Deprec	(453,093,511)	(26,789,250)	(479,882,760)
Accum Prov For Amort	(26,340,998)	-	(26,340,998)
Accum Def Income Tax	(77,318,488)	(1,367,730)	(78,686,218)
Unamortized ITC	(2,261,530)	-	(2,261,530)
Customer Adv For Const	(120,509)	-	(120,509)
Customer Service Deposits	(1,606,372)	-	(1,606,372)
Miscellaneous Deductions	(10,903,870)	-	(10,903,870)
Total Deductions:	(571,645,277)	(28,156,979)	(599,802,257)
Total Rate Base:	<u>600,197,130</u>	<u>(43,875,602)</u>	<u>556,321,528</u>

Return on Rate Base	5.533%	6.347%
Return on Equity	4.617%	6.476%
100 Basis Points on Equity		
Rev. Req. Impact	4,788,035	3,944,970

Note:

This schedule shows the effect of the incremental adjustments proposed in the testimony of PC witness Effron to the rebuttal position of the Company. It also recognizes the Company acceptance of certain PC adjustments in its rebuttal testimony.

Schedule DJE-1
 Page 1

PACIFICORP - WASHINGTON
 ISSUES SUMMARY
 (\$000)

	Source	Effect on Rate Base	Effect on Operating Income	Effect on Revenue Requirement
Miscellaneous Deferred Debits	(A)	\$ (3,193)	\$ -	\$ (406)
Acquisition Premium	(B)	(7,969)	293	(1,509)
Major Plant Additions	(C)	(31,163)	281	(4,441)
Out of Period Revenue Adjustment	(D)		-	-
Amortization of Capital Stock Expense	(E)		106	(179)
Incentive Compensation	(F)		581	(979)
IRS Tax Settlement	(G)	(1,551)	388	(852)
Income Tax Calculation	(H)		438	(739)
Rate of Return				
Return on Equity	(I)			(9,287)
Capital Structure	(I)			(3,273)
Total Revenue Requirement Effect of Issues				<u>\$ (21,665)</u>

Sources:

- (A) Schedule DJE -2.1
- (B) Schedule DJE -2.2
- (C) Schedule DJE -2.3
- (D) PacifiCorp Page 3.3.2 1,439*.59305
- (E) PacifiCorp Page 4.1 171*62.05%
- (F) Schedule DJE -2.4
- (G) PacifiCorp Page 7.4
- (H) Schedule DJE -2.5
- (I) Schedule DJE -3

Note: This schedule incorporates the effect on the interest synchronization into each individual adjustment

Schedule DJE-1
 Page 2

PACIFICORP - WASHINGTON
 ISSUES SUMMARY
 (\$000)

	<u>Source</u>	<u>Effect on Rate Base</u>	<u>Effect on Operating Income</u>	<u>Effect on Revenue Requirement</u>
Miscellaneous Deferred Debits	(A)	\$ (3,193)	\$ -	\$ (471)
Acquisition Premium	(B)	(7,969)	293	(1,671)
Major Plant Additions	(C)	(31,163)	281	(5,074)
Out of Period Revenue Adjustment	(D)		-	-
Amortization of Capital Stock Expense	(E)		106	(179)
Incentive Compensation	(F)		581	(979)
IRS Tax Settlement	(G)	(1,551)	388	(883)
Income Tax Calculation	(H)		438	(739)
Interest Synchronization Effect	(I)		(529)	891
Rate of Return				
Return on Equity	(J)			(9,287)
Capital Structure	(J)			(3,273)
Total Revenue Requirement Effect of Issues				<u>\$ (21,665)</u>

Sources:

(A)	Schedule DJE -2.1			
(B)	Schedule DJE -2.2			
(C)	Schedule DJE -2.3			
(D)	PacifiCorp Page 3.3.2	1,439*	.59305	
(E)	PacifiCorp Page 4.1	171*	62.05%	
(F)	Schedule DJE -2.4			
(G)	PacifiCorp Page 7.4			
(H)	Schedule DJE -2.5			
(I)	Total of Rate Base Adjustments	\$ (43,876)		
	Weighted Cost of Debt	3.175%	Schedule DJE-3	
	Synchronized Interest Expense	(1,393)		
	Income Tax Rate	37.95%		
	Income Tax Expense	<u>\$ 529</u>		
(J)	Schedule DJE-3			

Note: This schedule shows the effect on the interest synchronization of the aggregate of the adjustments to rate base as a separate adjustment

Schedule DJE-1
Page 3

PACIFICORP - WASHINGTON
FACTORS-CALCULATION OF REVENUE REQUIREMENT EFFECTS
(\$000)

A	SIT Rate	4.54%
B	FIT Rate	35.00%
C	Combined Tax Rate	37.95%
D	Complement	62.05%
E	Revenue Sensitive Expense Factor	0.9558
F	Revenue Conversion Factor	0.5931
G	Company Pre-Tax Return	12.17%
H	Rate Base Adjustment Factor	0.1273

Notes

A	PacifiCorp Page 2.1	
B	PacifiCorp Page 2.1	
C	=	$B+(1-B)*A$
D	=	$1 - C$
E	Uncollectible Accounts	0.357% PacifiCorp Page 1.2
	WA Revenue Tax	3.873% PacifiCorp Page 1.2
	WUTC Fee	<u>0.190%</u> PacifiCorp Page 1.2
	Total	4.420%
	Complement	95.580%
F	=	$D * E$
G	Schedule DJE-3	
H	=	G / E

Schedule DJE-2.1

PACIFICORP - WASHINGTON
MISCELLANEOUS DEFERRED DEBITS
(\$000)

Miscellaneous Deferred Debits in Rate Base	(A)	<u>\$ 7,597</u>
Amortization of Transition Plan Regulatory Asset	(B)	\$ 1,587
Adjustment to Income Taxes	37.95%	<u>(602)</u>
Adjustment to Net Operating Income		<u>\$ 985</u>

Sources:

- (A) PacifiCorp Page 1.1
- (B) PacifiCorp Page 4.4.2

Schedule DJE-2.2

PACIFICORP - WASHINGTON
ELECTRIC PLANT ACQUISITION ADJUSTMENTS IN RATE BASE
(\$000)

Plant Acquisition Adjustments in Rate Base	(A)	<u>\$ 7,969</u>
Amortization of Plant Acquisition Adjustments	(B)	\$ 473
Adjustment to Income Taxes	37.95%	<u>(180)</u>
Adjustment to Net Operating Income		<u>\$ 293</u>

Sources:

- (A) PacifiCorp Page 1.1
- (B) PacifiCorp Page 2.17

Schedule DJE-2.3
 Page 1

PACIFICORP - WASHINGTON
 MAJOR PLANT ADDITIONS
 (\$000)

Adjustment to Company Forecast of Plant Additions (A) \$ (4,557)

Adjustment to Accumulated Reserve for Depreciation

Modification to Plant Additions 145

Growth in Depreciation Reserve:

	(B)			
	Annual	Years	Total	
Steam Plant	11,553	2	23,106	
Hydro Plant	1,091	2	2,182	
Other Production Plant	823	2	1,646	
Total	13,467		26,934	(26,934)

Accumulated Deferred Income Taxes (C) 183

Total Adjustment to Company Rate Base \$ (31,163)

Depreciation Expense

	(A)		(D)	
Steam Plant	(4,190)	3.0547%	\$	(128)
Hydro Plant	435	2.4997%		11
Other Production Plant	<u>(802)</u>	3.4468%		<u>(28)</u>

Adjustment to Company Depreciation Expense (4,557) (145)

Company Depreciation Expense (E) 1,302

Net Depreciation Expense 1,157

Income Tax Expense 37.95% 439

Adjustment to Net Operating Income (718)

Company Adjustment to Net Operating Income (F) (999)

Adjustment to Company Pro Forma Net Operating Income \$ 281

Sources:

- (A) Schedule DJE-2.3, Page 2
- (B) PacifiCorp Page 2.16
- (C) PacifiCorp Page 8.4 4557/39209*1577
- (D) PacifiCorp Page 8.4.1
- (E) PacifiCorp Page 8.4
- (F) PacifiCorp Page 8.0

Schedule DJE-2.3
 Page 2

PACIFICORP - WASHINGTON
 MAJOR PLANT ADDITIONS
 (\$000)

	(A) Company Forecast	(B) Update	Difference	(C) Alloc. Factor	Adjstmt.
U1 Huntington ESP	20,500	256	(20,244)	8.627%	(1,746)
U1 Huntington LNB	10,384	-	(10,384)	8.627%	(896)
U2 Jim Bridger LNB	7,030	1,425	(5,605)	8.627%	(484)
Generator Rewind	5,988	3,801	(2,187)	8.627%	(189)
UO Coal Load-in Facility	5,500	-	(5,500)	8.627%	(474)
Controls Upgrade	5,461	4,777	(684)	8.627%	(59)
Rewind #2 Main Gen. Stator	5,288	5,578	290	8.627%	25
U2 Controls	5,252	5,581	329	8.627%	28
FY 2004 Cholla Capital	<u>4,460</u>	<u>-</u>	<u>(4,460)</u>	8.869%	<u>(396)</u>
TOTAL STEAM PLANT	<u>69,863</u>	<u>21,418</u>	<u>(48,445)</u>		<u>(4,190)</u>
Replace Prospect Flumes	11,479	12,860	1,381	8.627%	119
Swift 1 Oper. & Cap Upgrade	11,324	23,688	12,364	8.627%	1,067
Cove Flume Replacement	<u>8,701</u>	<u>-</u>	<u>(8,701)</u>	8.627%	<u>(751)</u>
TOTAL HYDRO PLANT	<u>31,504</u>	<u>36,548</u>	<u>5,044</u>		<u>435</u>
Currant Creek Phase 1	150,369	163,983	13,614	8.263%	1,125
Currant Creek Phase 2	<u>208,956</u>	<u>186,624</u>	<u>(22,332)</u>	8.627%	<u>(1,927)</u>
TOTAL OTHER PLANT	<u>359,325</u>	<u>350,607</u>	<u>(8,718)</u>		<u>(802)</u>
TOTAL CAPITAL ADDITIONS	<u>460,692</u>	<u>408,573</u>	<u>(52,119)</u>		<u>(4,557)</u>

Sources:

- (A) PacifiCorp Page 8.4.1
- (B) Response to Public Counsel Data Request 39
- (C) PacifiCorp Page 8.4

Schedule DJE-2.4

PACIFICORP - WASHINGTON
INCENTIVE COMPENSATION
(\$000)

Total Pro Forma Incentive Compensation	(A)	\$ 33,297
Allocation to Utility	(B)	<u>73.94%</u>
Cost Allocated to Utility		24,620
Allocation to Washington	(C)	<u>7.60%</u>
Cost Allocated to Washington		1,871
Proposed Adjustment	(D)	<u>50%</u>
Adjustment to Pro Forma Labor Expense		936
Adjustment to Income Taxes	37.95%	<u>(355)</u>
Adjustment to Net Operating Income		<u>\$ 581</u>

Sources:

- (A) PacifiCorp Page 4.10.5
- (B) PacifiCorp Page 4.10.5 459431/621347
- (C) PacifiCorp Page 4.9 2482/32655
- (D) See Testimony

Schedule DJE-2.5

PACIFICORP - WASHINGTON
 ADJUSTMENT TO INCOME TAX EXPENSE
 (\$000)

Adjusted Taxable Income before State Income Tax, per Company	(A)	\$ 1,367
Interest & Dividends (AFUDC - Equity)	(A)	<u>(612)</u>
Taxable Income before State Income Tax as Adjusted		755
State Income Tax Rate	(B)	<u>4.54%</u>
State Income Tax Expense		34
Company State Income Tax Expense	(A)	<u>379</u>
Adjustment to State Income Tax		<u>\$ (344)</u>
Adjusted Taxable Income before State Income Tax, per Company	(A)	\$ 1,367
Interest & Dividends (AFUDC - Equity)	(A)	(612)
State Income Tax		<u>(34)</u>
Taxable Income before Federal Income Tax as Adjusted		720
Federal Income Tax Rate		<u>35%</u>
Federal Income Tax Expense		252
Company Federal Income Tax Expense	(A)	<u>346</u>
Adjustment to Federal Income Tax		<u>\$ (94)</u>
Total Adjustment to Income Tax Expense		<u>\$ (438)</u>

Sources:

- (A) PacifiCorp Page 2.22
- (B) PacifiCorp Page 2.1

Schedule DJE-3
Page 1

PACIFICORP - WASHINGTON
EFFECT OF RATE OF RETURN PROPOSAL
(\$000)

Company Rate Base	(A)	\$ 600,197
Proposed Adjustments	(B)	<u>(43,876)</u>
Proposed Rate Base		\$ 556,321
Company Pre-Tax Rate of Return	(C)	12.167%
Pre-Tax Rate of Return - Public Counsel ROE, Company Cap. Structure	(C)	<u>10.571%</u>
Difference		1.596%
Effect on Pre-Tax Return Requirement		\$ 8,876
Gross-Up for Revenue Sensitive Expenses	(D)	<u>0.9558</u>
Effect on Revenue Requirement		<u>\$ 9,287</u>
Proposed Rate Base	(A)	\$ 556,321
Pre-Tax Rate of Return - Public Counsel ROE, Company Cap. Structure	(C)	10.571%
Pre-Tax Rate of Return - Public Counsel ROE and Capital Structure	(C)	<u>10.009%</u>
Difference		0.562%
Effect on Pre-Tax Return Requirement		\$ 3,129
Gross-Up for Revenue Sensitive Expenses	(D)	<u>0.9558</u>
Effect on Revenue Requirement		<u>\$ 3,273</u>

Sources:

- (A) PacifiCorp Page 1.1
- (B) Schedule DJE-1, Page 1
- (C) Schedule DJE-3
- (D) Schedule DJE-1, Page 3

Schedule DJE-3
 Page 2

PACIFICORP - WASHINGTON
 RATE OF RETURN

Per Company:

	<u>Percent of Total</u>	<u>Cost Rate</u>	<u>Weighted Cost</u>	<u>Pre-Tax Cost</u>
Long Term Debt	49.40%	6.43%	3.175%	3.175%
Preferred Stock	1.10%	6.59%	0.072%	0.117%
Common Equity	<u>49.50%</u>	11.13%	<u>5.507%</u>	<u>8.875%</u>
Total Capital	<u>100.00%</u>		<u>8.754%</u>	<u>12.167%</u>

With Company Capital Structure and Public Counsel Return on Equity:

	<u>Percent of Total</u>	<u>Cost Rate</u>	<u>Weighted Cost</u>	<u>Pre-Tax Cost</u>
Long Term Debt	49.40%	6.43%	3.175%	3.175%
Preferred Stock	1.10%	6.59%	0.072%	0.117%
Common Equity	<u>49.50%</u>	9.13%	<u>4.517%</u>	<u>7.280%</u>
Total Capital	<u>100.00%</u>		<u>7.764%</u>	<u>10.571%</u>

With Public Counsel Return on Equity and Capital Structure:

	<u>Percent of Total</u>	<u>Cost Rate</u>	<u>Weighted Cost</u>	<u>Pre-Tax Cost</u>
Short Term Debt	3.00%	3.00%	0.090%	0.090%
Long Term Debt	52.00%	6.43%	3.342%	3.342%
Preferred Stock	1.00%	6.59%	0.066%	0.106%
Common Equity	<u>44.00%</u>	9.13%	<u>4.015%</u>	<u>6.471%</u>
Total Capital	<u>100.00%</u>		<u>7.513%</u>	<u>10.009%</u>

Sources: PacifiCorp Page 2.1
 Testimony of Mr. Hill

	<u>Company Position</u>	<u>Adjustments</u>	<u>Proposed Position</u>
Rate Base	\$ 600,197,130	\$(43,875,602)	\$ 556,321,528
Rate of Return	<u>8.75%</u>	<u>-1.24%</u>	<u>7.51%</u>
Operating Income Requirement	52,543,075	(10,746,973)	41,796,103
Adjusted Operating Income	<u>33,209,409</u>	<u>2,101,488</u>	<u>35,310,897</u>
Income Deficiency (Excess)	19,333,666	(12,848,461)	6,485,205
Gross Revenue Conversion Factor	<u>0.5931</u>	<u>-</u>	<u>0.5931</u>
Revenue Deficiency (Excess)	<u>\$ 32,599,610</u>	<u>\$(21,664,531)</u>	<u>\$ 10,935,079</u>