

February 6, 2006

Carole Washburn Executive Secretary Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive, SW Olympia, WA 98504-7250

Re:

Docket No. UE 050684

WUTC Bench Staff Data Requests 30-33

Please find enclosed one original and eighteen copies of PacifiCorp's response to WUTC Bench Data Requests (30-33). Provided on the enclosed CD are Attachments WUTC Bench 30 -1, and 31-33.

If you have any questions, please call Shay LaBray at (503) 813-6176.

Sincerely,

Shay LaBray Regulation

Enclosure

cc:

Donald T. Trotter/WUTC (3 copies)

Simon ffitch/Public Counsel

Steven Johnson/ATG

Melinda Davison/ICNU

Randall Falkenberg/ICNU

Ralph Cavanagh/NRDC

Brad Purdy/Energy Project

Marcus Wood/Stoel Rives

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WUTC Bench Data Request 30

Please provide information on executive and director compensation in the same form as described in Section 1 of the SEC's January 17 press release. Copies of the press release are available at the side table.

Response to WUTC Bench Data Request 30

PacifiCorp is aware of the recent proposed rules put forward by the SEC. These rules are currently pending final approval. The SEC has stated organizations would not be responsible for implementing these evolving rules in their current year-end filings, but would be required to do so in 2007.

Although PacifiCorp has not yet incorporated the proposed rules into its current SEC reporting, we are providing the Commission with Executive and Director reporting for our most recent fiscal year-end (March 31, 2005) in Attachment WUTC_Bench 30-1 on the enclosed CD. Most of the SEC's proposed requirements are addressed, with the exception of additional detailed reporting proposed for equities and executive deferred compensation programs. As PacifiCorp offers an executive deferred compensation program to its senior executives, we are providing Confidential Attachment WUTC Bench 30-2, which shows for specific individuals contributions to the deferred compensation program from January 1, 2004 through September 30, 2004 and is marked confidential per the Protective Order in Docket No. UE-050684.

PacifiCorp will adopt the final rules that are approved and set forth by the SEC, likely to be for the 2007 reporting cycle.

GENERAL RATE CASE

PACIFICORP

WUTC BENCH DATA REQUEST

ATTACHMENT WUTC BENCH 30-1

ON THE ENCLOSED CD

WUTC Bench Data Request 31

Does PacifiCorp retain a consultant to assist the company in setting and adjusting compensation for its senior executives? If so please provide a copy of the most recent consultant report.

Response to WUTC Bench Data Request 31

Yes, PacifiCorp utilizes the consulting firm of Towers Perrin to assist with the annual review of total compensation for its executives. This review consists of an assessment and matching of job responsibilities to like jobs in the market place. The results outline market competitive levels of base, bonus and long term incentive. These results are then used to determine appropriate levels of adjustment for each senior executive. Please see Attachment WUTC_Bench 31 on the enclosed CD for a copy of the 2005 Towers Perrin Report/Assessment.

GENERAL RATE CASE PACIFICORP WUTC BENCH DATA REQUEST ATTACHMENT WUTC BENCH 31

ON THE ENCLOSED CD

WUTC Bench Data Request 32

Does PacifiCorp use performance metrics as criteria for adjusting compensation for its senior executives? If so please identify the metrics and provide documents explaining the performance metrics PacifiCorp uses?

Response to WUTC Bench Data Request 32

Yes, PacifiCorp does use performance metrics in determining compensation levels for its senior executives. Annually, each senior executive establishes performance goals that are reviewed and approved by the CEO. Please see Attachment WUTC_Bench 32 on the enclosed CD for copies of the goals for each senior executive for the 2005-06 performance year.

GENERAL RATE CASE PACIFICORP WUTC BENCH DATA REQUEST ATTACHMENT WUTC BENCH 32

ON THE ENCLOSED CD

WUTC Bench Data Request 33

Does PacifiCorp include benefits to ratepayers in any of the metrics used to judge adjust executive compensation? If so what performance metrics are used to measure benefits to ratepayers?

Response to WUTC Bench Data Request 33

Yes, PacifiCorp uses its performance balanced scorecards and related results in determining incentive levels and base adjustments for its senior executives. Please see Attachment WUTC_Bench 33 on the enclosed CD to review the 2004-2005 balanced scorecards and year-end results. These results are used in the Annual Incentive Plan calculations as previously described in rebuttal testimony.

GENERAL RATE CASE PACIFICORP WUTC BENCH DATA REQUEST ATTACHMENT WUTC BENCH 33 ON THE ENCLOSED CD