



February 8, 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 14-25

Please find enclosed one original and eighteen copies of PacifiCorp's 1st Supplemental response to WUTC Bench Data Request 21.

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

Sincerely,

A handwritten signature in black ink that reads "Shay LaBray" followed by a small flourish.

Shay LaBray
Regulation

Enclosure

cc: Donald T. Trotter/WUTC (3 copies)
Simon ffitth/Public Counsel
Steven Johnson/ATG
Melinda Davison/ICNU
Randall Falkenberg/ICNU
Ralph Cavanagh/NRDC
Brad Purdy/Energy Project
Marcus Wood/Stoel Rives

UE-050684/PacifiCorp
February 8, 2006
WUTC Bench Data Request 21 1st Supplemental

WUTC Bench Data Request 21

Please recalculate Exhibit 394 with volatility attributable to the western power crisis removed.

1st Supplemental Response to WUTC Bench Data Request 21

PacifiCorp submits, at the request of the Industrial Customers of Northwest Utilities ("ICNU"), this supplement to its earlier response to WUTC_Bench Request No. 21. Please see Attachment WUTC Bench 21 1st Supplemental, which is a spreadsheet that shows power cost volatility after totally deleting "energy crisis" months specified by ICNU of June 2000 to June 2001. By the ICNU method of adjusting for the effects of the power crisis, PacifiCorp's average annual under recovery would have been \$207.9 million, which would be an increase of 2036% from the levels as shown for the pre-power crisis period.

While the alternate ICNU calculation confirms that the volatility of power costs has by any measure increased tremendously, PacifiCorp believes that its initial submission, which adjusted power crisis numbers, but did not omit an entire year's data, is more representative of ongoing power cost risks. PacifiCorp would not, in making the requested comparison, delete an entire year's data, as proposed by ICNU because the deleted year, in addition to including the impacts of the power crisis, also included the impacts of two non-power-crisis events that may recur. The non-power-crisis events that occurred during this deleted year were (a) a very low year for hydroelectric generation and (b) an extended forced outage at one of PacifiCorp's generation facilities.

Responder: Mark Widmer
Witness: Mark Widmer

WASHINGTON

UE-050684

GENERAL RATE CASE

PACIFICORP

WUTC BENCH DATA REQUEST

ATTACHMENT

WUTC BENCH 21 1ST SUPPLEMENTAL

Attachment WUTC Bench 21 1st Supplemental

**PacifiCorp
NPC In Rates Vs Actual NPC w/Western Energy Crisis Adjustment
Total Company NPC in Washington Rates
2000-2004
Power Costs in Millions \$**

	Reference	1990-1999	2000 (1)	2001 (2)	2002	2003	2004 (3)	2005 (4)
1 NPC in Rates	UE 050684 - Exhibit No.__(MTW-4)		462.3	486.0	486.0	486.0	492.0	534.0
2 Actual NPC	UE 050684 - Exhibit No.__(MTW-4)		841.1	1210.4	677.7	598.2	745.6	764.0
3 Excess NPC [Line 1 - Line 2]			(378.8)	(724.4)	(191.7)	(112.2)	(253.6)	(230.0)
4 Average Difference	10.7 1990-1999				(315.1) 2000-2005			
5 Percentage Change from 90-99 Period to 00-05 Period [Line 4]					3034%			
6 Adjustment to NPC in Rates			(277.2)	(191.6)				
7 Adjustment to Actual NPC			(662.0)	(449.9)				
8 NPC in Rates Adjusted for Energy Crisis [Line 1 + Line 6] (5)			185.2	294.4	486.0	486.0	492.0	534.0
9 Actual NPC Adjusted for Energy Crisis [Line 2 + Line 7]			179.1	760.5	677.7	598.2	745.6	764.0
10 Excess NPC (Excluding Energy Crisis) [Line 8 - Line 9]			6.0	(466.1)	(191.7)	(112.2)	(253.6)	(230.0)
11 Average Difference	10.7 1990-1999				(207.9) 2000-2005			
12 Percentage Change from 90-99 Period to 00-05 Period [Line 11]					2036%			

Notes:

- 1** Does not include Excess Power Costs recovered in Oregon Rates
- 2** NPC in Rates is Filed NPC in Docket #991832
- 3** NPC in Rates as of November 16th, 2004 is \$534 million
- 4** 12 Months Ending November 2005
- 5** Western Power Crisis Period is June 2000 to June 2001