

February 10, 2006

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: *WUTC v. PacifiCorp*
Docket No. UE-050684
Bench Request Nos. 21 and 25

Dear Ms. Washburn:

1. Bench Request No. 21.

Commission Staff has been pursuing this item and has asked PacifiCorp for additional information, but it has not all been supplied. Consequently, Staff will respond later, if necessary, after it has sufficient information to formulate a response.

2. Bench Request No. 25.

Commission Staff objects to the Company's Response to Bench Request No. 25. The request asked for a comparison of rates before the Pacific Power & Light/Utah Power & Light Merger, and present, for Avista, PSE, PacifiCorp-Washington and PacifiCorp-Utah.

Staff does not object because the Company used a different overall approach to the Response than Staff did. If done correctly, the Company's approach can provide reasonably accurate responsive information.

However, in its response, the Company used 1300 kWh as the average residential customer usage and applied it to tariff rates applicable in 1988 and currently. Staff believes the average usage should be specific to each utility, i.e., PSE average residential usage should be used in the PSE calculation, Avista average residential usage should be used in the Avista calculation, PacifiCorp Washington average residential usage should be used in the PacifiCorp-Washington

Carole Washburn
February 10, 2006
Page 2

calculation, and PacifiCorp-Utah average residential usage should be used in the PacifiCorp Utah-calculation.

The attached Staff Supplemental Response to Bench Request No. 25 does this.

Sincerely,

DONALD T. TROTTER
Senior Counsel

DTT:klg
Enclosures
cc: Parties