Exhibit No.\_\_\_ (RJF-5) Docket No. UE-100749 Witness: Randall J. Falkenberg

### BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

	)	
WASHINGTON UTILITIES AND	)	
TRANSPORTATION COMMISSION,	)	
	)	
Complainant,	)	
	)	Docket No. UE-100749
v.	)	
	)	
PACIFICORP d/b/a PACIFIC POWER &	)	
LIGHT COMPANY,	)	
	)	
Respondent.	)	

EXHIBIT NO. \_\_\_ (RJF-5)

PACIFICORP DATA RESPONSES

October 5, 2010

20000-266-EP-07/Rocky Mountain Power March 5, 2007 WIEC 1<sup>st</sup> Set Data Request 1.6

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#### WIEC Data Request 1.6

Explain why some parts of the SMUD contract are priced at market. Explain why the Company has decided on this treatment. To the extent this rests on precedent, provide citations to pertinent orders.

### Response to WIEC Data Request 1.6

Pursuant to the Company's contract with SMUD, they have the right to take up to 219,000 MWh of Provisional Firm Energy per year. If SMUD takes Provisional Firm Energy, they are required to return an equal volume to the Company by December 31 of each year.

For rate-making purposes, the Company has always excluded the Provisional Firm Energy sale and purchase because (1) it is not a fixed obligation like the Firm Energy sale, and (2) the volumes are offset on an annual basis.

A copy of the SMUD contract is provided as Attachment WIEC 1.6 on the enclosed CD.

Resource	Version Name	Attribute	Priority	Start Date All Times Value	Value
SMUD Provisional	SMUD Provisional return	Dispatch Type			<b>SMUD Provisional</b>
SMUD Provisional	SMUD Provisional return	<b>Energy Direction</b>			Purchase
SMUD Provisional	SMUD Provisional return	Inception Date			,06/10/1987
SMUD Provisional	SMUD Provisional return	Time Period			Hourly
SMUD Provisional	SMUD Provisional return	Block Period			Unset Value
SMUD Provisional	<b>SMUD Provisional return</b>	Option Type			Put Option
SMUD Provisional	SMUD Provisional return	Pricing Archetype			Fixed Price
SMUD Provisional	SMUD Provisional return	Season End Date			January 1
SMUD Provisional	SMUD Provisional return	Season Start Date			January 1
SMUD Provisional	SMUD Provisional return	Shaping Type			Price Shaping
SMUD Provisional	SMUD Provisional return	<b>Termination Date</b>			'01/01/2015
SMUD Provisional	SMUD Provisional return	MAX ANNUAL TAKE (MWł	0	>	219000
<b>SMUD Provisional</b>	<b>SMUD Provisional return</b>	RESTRICTED	0	>	П

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UE-100749/PacifiCorp July 26, 2010 ICNU Data Request 5.5

# **ICNU Data Request 5.5**

Please explain why the Company modeled the Campbell project based on data for Stateline.

# **Response to ICNU Data Request 5.5**

The Campbell wind farm is located in the vicinity of the Stateline wind farm.

PREPARER: Hui Shu

SPONSOR: Gregory N. Duvall

UE-100749/PacifiCorp September 17, 2010 ICNU Data Request 13.1

#### **ICNU Data Request 13.1**

Please refer to ICNU 9.2 and 9.3. This response says that RECs from WCA resources are allocated to Washington on the basis of the CAGW factor. For non-WCA resources no RECs are allocated to Washington. However, Attachment ICNU 9.1-2 appears to show that Washington has been allocated RECs from WCA resources based on a much lower percentage allocation, apparently the SG factor. Please explain this apparent discrepancy.

### **Response to ICNU Data Request 13.1**

For the sale of RECs associated with west-side resources, the Company applies the Control Area Generation West (CAGW) factor to determine Washington's allocated share of the REC revenues. The physical RECs or Western Renewable Energy Generation Information System (WREGIS) certificates, however, are allocated based on the SG factor so that there is no double counting of the physical WREGIS certificates that would be allocated to the other states PacifiCorp serves.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

UE-216/PacifiCorp April 20, 2010 OPUC Data Request 22

#### **OPUC Data Request 22**

The Company has stated that it is including the inter-hour wind integration costs for its two projects in the BPA control area. (PPL(TAM)/100, Duvall/17, Lines 11-14)

- a) If BPA is not required to provide the inter-hour wind integration services for PacifiCorp's facilities located in its control area, why is the Company including inter-hour wind integration services for those facilities located in its control area, e.g. Long Hollow?
- b) Using PacifiCorp's logic, wouldn't those facilities located in its control area, of which PacifiCorp is not the contracted recipient, have to provide there own inter-hour wind integration?

## Response to OPUC Data Request 22

a) The Company does not incur day-ahead or hour-ahead (inter-hour) costs for wind facilities located in its control area if the output of the plant is not included in the Company's resource portfolio.

Strain Albania

b) Yes.

UE-080220/PacifiCorp April 9, 2008 ICNU Data Request 4.22

# **ICNU Data Request 4.22**

Does GRID simulate arbitrage for secondary transactions between transmission areas?

# Response to ICNU Data Request 4.22

Yes.

PREPARER: Hui Shu

SPONSOR: Hui Shu

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UE-080220/PacifiCorp April 9, 2008 ICNU Data Request 4.23

### **ICNU Data Request 4.23**

If the answer to the above question is yes, can PacifiCorp quantify the amounts of arbitrage already included in GRID? If not, please indicate the amount of arbitrage profits included in the test year or indicate how to quantify these profits.

### Response to ICNU Data Request 4.23

No, the Company can not quantify the amounts of arbitrage already included in system balancing of GRID. For arbitrage that is included in the short term firm transactions, please refer to the Company's response to ICNU Data Request 1.13(b).

PREPARER: Hui Shu

SPONSOR: Hui Shu

UE-100749/PacifiCorp July 8, 2010 ICNU Data Request 2.10

### **ICNU Data Request 2.10**

Please refer to the response to ICNU 1.20. Please provide a list identifying all known errors in the spreadsheets used to compute the wind integration expenses computed in these spreadsheets (Attachments 1.20-1 through 1.20-5).

### Response to ICNU Data Request 2.10

The known spreadsheet errors include:

- Inclusion of only one gas turbine for the Lake Side combined-cycle plant maximum capacity
- Use of 1x1 gas turbine operation to specify minimum capacity for the Lake Side combined cycle plant
- Exclusion of the duct firing capability for the Currant Creek combinedcycle gas plant
- Use of 1x1 gas turbine operation to specify minimum capacity for the Currant Creek combined-cycle plant
- In-Service year data does not control whether an asset is available for holding reserves in the 2011 Test Year Analysis
- Inclusion of the 2012 East PPA resource in 2011
- Inclusion of the 2014 combined-cycle gas resource in 2011
- Inclusion of the 2016 Intercooled Aeroderivative simple-cycle resource in 2011
- Exclusion of Dave Johnston unit 4 as a source of spinning reserves
- Exclusion of Gadsby steam units 1 through 3 as a source of spinning reserves
- Exclusion of Carbon units 1 and 2 as a source of spinning reserves

PREPARER: Pete Warnken

SPONSOR: Gregory N. Duvall

UE-100749/PacifiCorp September 28, 2010 ICNU Data Request 17.2

### **ICNU Data Request 17.2**

Please provide the average industrial rate for Washington and Utah at the time of the Utah Power & Light / Pacific Power & Light merger and the average industrial rate for Washington and Utah in 2009.

### **Response to ICNU Data Request 17.2**

The Company objects to this request on the basis that it requests information related to time periods and a jurisdiction not relevant to this proceeding. Without waiving this objection, the Company responds as follows:

The average rates for the industrial customer classes in Washington and Utah at the time of the Utah Power & Light / Pacific Power & Light merger and at the end of 2009 are as follows:

Washington:

Merger: 3.77 cents/kWh 2009: 4.81 cents/kWh

Utah:

Merger: 4.27 cents/ kWh 2009: 4.89 cents/kWh

PREPARER: Mike Zimmerman

SPONSOR: William R. Griffith