



Motion does not address other procedural or substantive arguments the Joint Movants may individually take if they decide to participate in proceedings regarding Docket Nos. UE-991832 and UE-020417.

### **BACKGROUND**

On November 24, 1999, PacifiCorp filed certain tariff revisions designed to increase general rates for electric service by approximately \$25.8 million over two years. The Commission docketed PacifiCorp's request as Docket No. UE-991832. PacifiCorp and the Joint Movants constitute all major parties to that proceeding.

On June 6 and June 20, 2000, PacifiCorp and the Joint Movants submitted two Stipulations ("Stipulations") with the Commission resolving the contested issues in Docket No. UE-991832. The Stipulations proposed a five-year rate plan ("Rate Plan") designed to provide rate stability for customers and allow PacifiCorp to gradually increase rates during the first three years of the Rate Plan. The five-year Rate Plan also allowed PacifiCorp to retain significant cost savings, including savings from the ScottishPower/PacifiCorp merger.

On July 17, 2000, the Commission held a hearing to review the Stipulations. On August 9, 2000, the Commission approved the Stipulations. WUTC v. PacifiCorp, Third Suppl. Order, Docket No. UE-991832 (Aug. 9, 2000) ("Third Supplemental Order").

PacifiCorp has increased rates twice under the Stipulation. On September 1, 2000, PacifiCorp increased general rates by 3%. Third Supplemental Order at 12-13 and 23-25. On January 1, 2002, PacifiCorp increased general rates by 3%. WUTC v. PacifiCorp, Sixth Suppl. Order Docket No. UE-991832 at 1-2 (Dec. 21, 2001). The Third Supplemental Order approving the Stipulations also allows PacifiCorp to increase general rates by 1% on January 1,

2003, and bars PacifiCorp from increasing rates during the last two years of the Rate Plan. Third Supplemental Order at 12-13, 23-25.

On April 5, 2002, PacifiCorp filed a petition for an accounting order authorizing deferral of excess net power costs (“Petition”). The Commission has assigned the Petition Docket No. UE-020417. PacifiCorp’s Petition seeks to defer excess net power costs the Company claims will be incurred to serve its Washington customers. Petition at 1. PacifiCorp’s Petition only addresses the single issue of alleged power cost increases and ignores other revenue requirement issues. PacifiCorp proposes that power cost related deferrals begin June 1, 2002, and continue until the earlier of May 31, 2003, or when the Commission approves a power cost adjustment mechanism for the Company. Petition at 1. PacifiCorp intends to file a proposal to recover any deferred net power costs before October 1, 2002, but also admits that the five-year Rate Plan will limit its ability to impose general rate increases prior to 2005. Petition at 2, 13.

### **ARGUMENT**

**1. The Commission Should Consolidate Docket Nos. UE-991832 and UE-020417**

PacifiCorp Docket Nos. UE-991832 and UE-020417 should be consolidated because there are sufficient issues of fact and law in common to the proceedings to warrant consolidation. The Commission’s rules authorize consolidation of two or more proceedings in which the facts or principles of law are related. WAC § 480-09-610. The Commission routinely grants consolidation when it “will promote administrative efficiency and preserve the resources of the Commission and the parties.” *See, e.g. WUTC v. Puget Sound Energy*, Docket Nos. UE-011570 and UG-011571, Second Suppl. Order (Dec. 28, 2001) at 1.

PacifiCorp's Petition raises significant legal and factual issues that cannot be resolved without the record in Docket No. UE-991832. PacifiCorp admits that its Petition must be consistent with the Washington Rate Plan and that the Rate Plan limits general rate increases until 2005. Petition at 2, 12. Despite acknowledging that the Company is limited by the Rate Plan, PacifiCorp intends on making a filing, no later than September 30, 2002, to address rate recovery of deferred power costs, potentially including a "limited form of rate relief to address extraordinary power costs." Petition at 2, 12-13. PacifiCorp proposes that any recovery of deferred amounts "would take into account the restrictions imposed on the Company under the Rate Plan." Petition at 12. Consolidating the records in Docket Nos. UE-020417 and UE-991832 will allow the Commission to: 1) review whether PacifiCorp's Petition is consistent with the letter and intent of the Rate Plan; 2) determine the Company's actual power supply situation in the context of whether there are currently extraordinary circumstances warranting revisiting power costs; and 3) evaluate the extent that PacifiCorp's power cost deferral should be offset by revenue requirement reductions, including Company wide cost savings resulting from the ScottishPower merger.

PacifiCorp's Petition may violate the Commission approved Rate Plan. The Rate Plan provided customers with rate stability by preventing PacifiCorp, except in limited circumstances, from filing rate changes prior to 2005. Section 9 of the Stipulation addressing the Rate Plan enumerates the circumstances by which PacifiCorp can adjust rates during the Rate Plan, including interim rate relief and appropriate deferred accounting petitions. Third Supplemental Order at 11, 23 and Appendix B at 6-7. The Commission acknowledged that any modifications under Section 9 must continue to provide "for rate stability over the five-year Rate

Plan Period.” Id. at 23. Some of the parties in Docket No. UE-020417 may argue that Section 9 does not allow PacifiCorp to file a deferral application for a significant portion of its total revenue requirement without an extraordinary factual demonstration. The meaning of the five-year rate stability and exceptions contained in Section 9 are common issues of fact and law that require review of the record in both Docket Nos. UE-020417 and UE-991832.

PacifiCorp’s Petition may also violate the Rate Plan because the Company is requesting a single issue power cost deferral that ignores other countervailing factors that may impact its revenue requirement. For example, some parties in Docket No. UE-020417 may argue that the significant cost savings PacifiCorp was expected to achieve during the Rate Plan should offset any increases in its net power costs. In addition, the appropriate amount of PacifiCorp’s power costs that are currently “in rates” may be a significant dispute in Docket No. UE-020417.<sup>1</sup> A determination of whether PacifiCorp’s Petition is consistent with the Rate Plan can only occur in the context of the record in Docket No. UE-991832.

## **2. The Commission Should Rehear or Reopen Docket No. UE-991832**

The record in Docket No. UE-991832 should be reheard or reopened to determine if the Petition is consistent with the Rate Plan. The Commission’s rules explicitly allow “any person affected by a final order” to file rehearing after the close of the record. WAC § 480-09-820. The Commission has determined that a “petition for rehearing must show changed

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<sup>1</sup> PacifiCorp claims the power costs currently “in rates” are \$486 million. This is based on the amount PacifiCorp requested the general rate case filing in Docket No. UE-991832. Petition at 7. The Petition fails to acknowledge that all parties recognized that the Company’s power costs were expected to increase over the five-year Rate Plan. In addition, the Company’s alleged \$674 million in system-wide power costs PacifiCorp significantly exceeds the \$589.3 million system-wide power costs the Company recently stipulated to in Oregon (“Oregon Stipulation”). Attachment A (March 29, 2002 Stipulation in Oregon P.U.C. Docket Nos. UE 134/UM 1047). The test year in the Oregon Stipulation is identical to the power cost test year in PacifiCorp’s Petition. Petition at 7 (twelve months ending May 31, 2003); Attachment A at 1 (twelve months ending May 2003).

legal conclusions reached in Docket No. UE-991832, and, thus, warrants good and sufficient cause to rehear or reopen the record. WAC §§ 480-09-010, -820; RCW §§ 80.01.040(2), (3).

### **CONCLUSION**

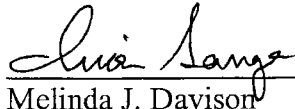
The five-year Rate Plan the Commission approved was intended to resolve numerous contested revenue requirement issues in Docket No. UE-991832 and provide PacifiCorp and the Company's Washington ratepayers with five years of predictable, known rates. PacifiCorp's Petition does not appropriately reflect the context of the Rate Plan and the Company may not have met its burden of proof to establish that the Petition is consistent with the Rate Plan. This Motion requests that the Commission acknowledge that PacifiCorp's Petition in Docket No. UE-020417 raises important legal and factual issues that are in common with, and must be evaluated in the context of, the factual record in Docket No. UE-991832. Likewise, if the Commission does not dismiss PacifiCorp's Petition, the factual and legal conclusions reached in Docket No. UE-991832 must be re-examined to consider the evidence with the Petition in UE-020417.

WHEREFORE, the Joint Movants respectfully request that the Commission grant the Petition to Reopen or Rehear Docket No. UE-991832 and Motion to Consolidate Docket Nos. UE-991832 and UE-020417.

Dated this 10th day of May, 2002.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Melinda J. Davison  
Irion A. Sanger  
Davison Van Cleve, P.C.  
100 S.W. Broadway, Suite 2460  
Portland, OR 97205  
(503) 241-7242 phone  
(503) 241-8160 fax  
[mail@dvclaw.com](mailto:mail@dvclaw.com)  
Of Attorneys for the Industrial  
Customers of Northwest Utilities

CHRISTINE O. GREGOIRE  
Attorney General

---

Robert D. Cedarbaum  
Senior Counsel  
Washington Utilities and Transportation Comm'n  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250  
(360) 664-1160 phone  
(360) 586-5522 fax  
[bcedarba@wutc.wa.gov](mailto:bcedarba@wutc.wa.gov)  
Of Attorneys for WUTC Staff

CHRISTINE O. GREGOIRE  
Attorney General

THE ENERGY PROJECT

---

Robert W. Cromwell, Jr.  
Assistant Attorney General  
Public Counsel Section  
Washington State Attorney General's Office  
900 Fourth Avenue, Suite 2000  
Seattle, WA 98164-1012  
(206) 464-6595 phone  
(206) 389-2058 fax  
[RobertC1@atg.wa.gov](mailto:RobertC1@atg.wa.gov)

---

Chuck Eberdt  
314 E. Holly Street  
Bellingham, WA 98225  
(360) 734-5121 phone  
(360) 676-2142 fax  
[chuck\\_eberdt@oppco.org](mailto:chuck_eberdt@oppco.org)

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

---

Melinda J. Davison  
Irion A. Sanger  
Davison Van Cleve, P.C.  
100 S.W. Broadway, Suite 2460  
Portland, OR 97205  
(503) 241-7242 phone  
(503) 241-8160 fax  
[mail@dvclaw.com](mailto:mail@dvclaw.com)  
Of Attorneys for the Industrial  
Customers of Northwest Utilities

CHRISTINE O. GREGOIRE  
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(206) 389-2058 fax  
[RobertC1@atg.wa.gov](mailto:RobertC1@atg.wa.gov)

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Senior Counsel  
Washington Utilities and Transportation Comm'n  
1300 S. Evergreen Park Drive S. W.  
P.O. Box 47250  
Olympia, WA 98504-7250  
(360) 664-1160 phone  
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Of Attorneys for WUTC Staff

THE ENERGY PROJECT



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Chuck Eberdt  
314 E. Holly Street  
Bellingham, WA 98225  
(360) 734-5121 phone  
(360) 676-2142 fax  
[chuck\\_eberdt@oppcco.org](mailto:chuck_eberdt@oppcco.org)



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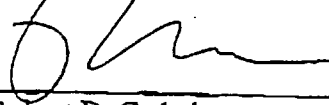
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(503) 241-7242 phone  
(503) 241-8160 fax  
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900 Fourth Avenue, Suite 2000  
Seattle, WA 98164-1012  
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(206) 389-2058 fax  
[RobertC1@atg.wa.gov](mailto:RobertC1@atg.wa.gov)

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Attorney General



---

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Senior Counsel  
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Olympia, WA 98504-7250  
(360) 664-1160 phone  
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[bcedarba@wutc.wa.gov](mailto:bcedarba@wutc.wa.gov)  
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---

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314 E. Holly Street  
Bellingham, WA 98225  
(360) 734-5121 phone  
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[chuck\\_eberdt@oppco.org](mailto:chuck_eberdt@oppco.org)

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

CHRISTINE O. GREGOIRE  
Attorney General

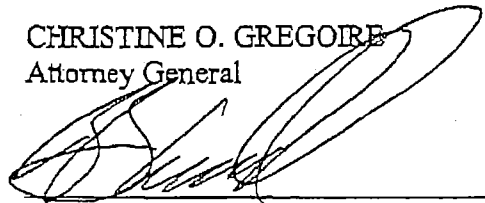
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Irion A. Sanger  
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Robert D. Cedarbaum  
Senior Counsel  
Washington Utilities and Transportation Comm'n  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250  
(360) 664-1160 phone  
(360) 586-5522 fax  
[bcedarba@wutc.wa.gov](mailto:bcedarba@wutc.wa.gov)  
Of Attorneys for WUTC Staff

CHRISTINE O. GREGOIRE  
Attorney General



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Robert W. Cromwell, Jr.  
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900 Fourth Avenue, Suite 2000  
Seattle, WA 98164-1012  
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(206) 389-2058 fax  
[RobertC1@atg.wa.gov](mailto:RobertC1@atg.wa.gov)

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---

Chuck Eberdt  
314 E. Holly Street  
Bellingham, WA 98225  
(360) 734-5121 phone  
(360) 676-2142 fax  
[chuck\\_eberdt@oppco.org](mailto:chuck_eberdt@oppco.org)

NORTHWEST ENERGY COALITION

A handwritten signature in cursive script that reads "Danielle Dixon". The signature is written in black ink and is positioned above a horizontal line.

Danielle Dixon  
Policy Associate  
219 First Avenue South, Suite 100  
Seattle, WA 98104  
(206) 621-0094 phone  
(206) 621-0097 fax  
[danielle@nwenergy.org](mailto:danielle@nwenergy.org)

## **ATTACHMENT A**



1 that extended the Company's filing deadline to December 31, 2001; the projected date for a  
2 Commission order to June 30, 2002; and changed the future test year that would be the basis for  
3 the power cost filing to the 12-months ending June 30, 2003.

4 3. On December 28, 2001, the Company filed revised tariff schedules to reflect net  
5 power costs derived from the Company's new hourly power cost model, GRID, based on the  
6 July 2002-June 2003 test year, docketed UE 134. Through the revised tariffs, PacifiCorp sought  
7 a revenue requirement increase of \$34.3 million (Oregon basis) and an average overall price  
8 increase of 4.2 percent. The projected date for a Commission order in UE 134 was June 30,  
9 2002.

10 4. On January 10, 2002, the Company filed an application requesting that the  
11 Commission issue an accounting order regarding unrecovered Trail Mountain Mine closure  
12 costs, docketed UM 1047. In its Application, the Company requests authority to amortize  
13 unrecovered Trail Mountain Mine closure costs over five years.

14 5. On February 4, 2002, Staff requested that the Commission consolidate Docket  
15 UM 1047 with Docket UE 134 and in that consolidated docket: (1) determine the rate base and  
16 revenue requirement effects of the Company's sale and transfer of electric properties and transfer  
17 of service territory to the City of Hermiston (previously approved by the Commission in Order  
18 No. 01-830 in Docket UP 187); and (2) examine issues related to interjurisdictional allocation of  
19 fixed generation costs, including special retail contracts.

20 6. On February 13, 2002, Administrative Law Judge Kathryn Logan granted the  
21 Staff's motion to consolidate Dockets UM 1047 and UE 134 and to consider issues related to the  
22 interjurisdictional allocation of special retail contracts and the sale of facilities in Hermiston.

23 7. Pursuant to the schedule adopted in this proceeding, settlement discussions were  
24 held on March 7, 14, 15, 19 and 27, 2002. As a result of the settlement conferences, the Parties  
25 to this Stipulation have reached agreement on the matters set forth below. The net effect of the  
26 Stipulation is an average overall revenue requirement increase of \$14.2 million or 1.74 percent.

1 The parties submit this Stipulation to the Commission and request that the Commission approve  
2 the settlement as presented.

3 **AGREEMENT**

4 8. Net Power Costs: The Parties agree that the Company's annual net power costs  
5 will be set at \$589.3 million on a Total Company basis ("NPC"). This NPC results in a  
6 reduction in PacifiCorp's Oregon rates of \$1.9 million as compared to the \$595 million (total  
7 Company) "Initial Baseline" established in the Bridge Stipulation. The \$589.3 million  
8 represents a global settlement of the Parties' proposed power cost adjustments and establishes the  
9 Company's normalized net power costs for the test period.

10 9. West Valley Combustion Turbines (CTs): The Parties agree that if the  
11 Commission approves the Company's Affiliated Interest Application in Docket UI 196, filed on  
12 March 6, 2002, the NPC agreed to in this Stipulation will increase by no more than \$3.6 million  
13 (Total Company) and will be based on the first-year lease costs. This change will effect an  
14 increase in PacifiCorp's Oregon revenue requirement by an amount not to exceed \$1.2 million.  
15 If the CTs lease payment is changed, any difference in the revenue requirement effect will be  
16 reflected in the increase agreed to in this Paragraph; however, PacifiCorp agrees that in no event  
17 will the revenue requirement impact be more than \$1.2 million (Oregon allocated). In order to  
18 minimize the frequency of rate changes, if the Commission issues an order approving the  
19 Company's UI 196 application on or before June 1, 2002, any rate increase will be implemented  
20 on June 1, 2002. If the Commission issues an order approving the Company's UI 196  
21 application after June 1, 2002, any rate increase will be implemented with PacifiCorp's next  
22 Oregon rate change. The Parties do not agree by this paragraph that the Affiliated Interest  
23 Application in UI 196 is appropriate or waive their rights to contest that Application or its terms  
24 or conditions.

25

26

1           10.    Trail Mountain Mine:

2           a.       The Parties agree to support entry of an accounting order on or before  
3           March 31, 2002, that allows the Company to record previously unrecovered Trail  
4           Mountain Mine Closure Costs ("Closure Costs"), identified in paragraph (b) below, for  
5           later recovery.

6           b.       The Parties agree to the following ratemaking treatment for the Closure  
7           Costs. The Company will be allowed to recover the amortization of Closure Costs of  
8           Trail Mountain Mine subject to the following conditions:

- 9                   1.       Trail Mountain Mine provided coal exclusively to the Hunter  
10                   Plants. The other owners of the Hunter Plants are responsible for  
11                   their 15 percent of the Closure Costs. Therefore, this 15 percent  
12                   will be subtracted from the total Closure Costs. Accordingly,  
13                   PacifiCorp's Oregon ratepayers will be responsible for 85 percent,  
14                   or \$13,180,275, of the total unrecovered Closure Costs.
- 15                   2.       The recovery will be through a separate tariff. This tariff will  
16                   terminate when the \$13,180,275 balance has been fully collected.
- 17                   3.       The amortization will be through Account 501, but will not be  
18                   allowed to impact any power cost adjustment ("PCA") that may be  
19                   implemented in the future. PacifiCorp will record the amortization  
20                   in a separate subaccount.
- 21                   4.       The Company will forego a return on the unamortized Closure  
22                   Costs.
- 23                   5.       The balance of \$13,180,275 (Oregon basis) will be amortized over  
24                   approximately five years.

25           The Parties' agreement regarding the Closure Costs results in a \$2,636,055 annual  
26           amortization collected from Oregon customers over approximately a five-year period.



1 c. The Parties agree that the Company should permanently remove Trail  
2 Mountain Mine from the Company's base rates on June 1, 2002, resulting in a  
3 \$1,075,210 revenue requirement decrease.

4 11. Hermiston:

5 a. In Order 01-380, the Commission ordered PacifiCorp to record the after-  
6 tax net gain of its sale of its electric properties to Hermiston on its regulated books by  
7 allocating 95% of this net gain to its customers. In Order 01-787, the Commission  
8 ordered PacifiCorp to maintain a balancing account reflecting the gains and losses of  
9 property sales for later refund or collection from customers in a supplemental tariff.

10 Consistent with those orders, the Parties now agree that:

- 11 1. The Hermiston gain should be put in a balancing account as of the  
12 time PacifiCorp receives revenues from the sale.
- 13 2. Interest on 95% of the gain should be calculated at PacifiCorp's  
14 authorized rate of return from the date the revenues from the sale  
15 are received, and should continue until the balance is fully returned  
16 to customers.
- 17 3. Ninety-five percent of the gain, plus interest, will be amortized  
18 over one year and returned to customers beginning on June 1,  
19 2002.

20 The result of this agreement is estimated to be a \$3,372,257 amortization (Oregon  
21 basis) returned to customers over a one-year period. This amount will be trued-up when  
22 the final journal entries are made; however, PacifiCorp agrees to amortize no less than  
23 \$3,372,257 beginning on June 1, 2002.

24 b. The Parties agree that the Company should permanently remove the  
25 electric assets sold to Hermiston from the Company's base rates on June 1, 2002,  
26 resulting in a \$675,575 revenue requirement decrease.

1           12.    Power Cost Adjustment: The Company agrees to withdraw its request for a  
2 Power Cost Adjustment (“PCA”) in Docket UE 134 without prejudice to refileing a request for a  
3 PCA in a separate docket. The Company further agrees that it will not file a request for a PCA  
4 in 2002. If the Company files a request for a PCA after 2002, the Parties are free to raise any  
5 issues in connection with that filing.

6           13.    Future Filing: The Company agrees to make a single issue (power cost) rate  
7 filing by October 1, 2003, for rates effective June 1, 2004, if requested to do so by the  
8 Commission on or before July 31, 2003 (“Power Cost Rate Filing”). At its option, the  
9 Company may include the Power Cost Rate Filing within a general rate filing. Any Party to this  
10 Stipulation may ask the Commission to request the Company to make the Power Cost Rate Filing  
11 in accordance with this paragraph and the Company may, at its option, oppose or support this  
12 request. If the Commission requests that PacifiCorp make the Power Cost Rate Filing under this  
13 paragraph, the Company agrees to comply with the request and to bear the burden of proof in  
14 the ensuing rate proceeding. It is further agreed that any Party to this Stipulation can request  
15 that other issues, in addition to power costs, be considered in connection with the Power Cost  
16 Rate Filing. Issues other than those related to power costs can serve as the basis for any Party’s  
17 request that the Commission request the Power Cost Rate Filing under this paragraph.

18           14.    Information Sharing: The Company agrees to provide to all Parties to this  
19 Stipulation copies of the monthly actual net power cost report. In addition, the Company agrees  
20 to provide to all Parties to the Stipulation a Special Annual Results of Operation Report for  
21 calendar year 2002 by April 30, 2003, and a marginal cost study for the purpose of reviewing  
22 the Rate Mitigation Adjustment (“RMA”) and other rate issues by May 31, 2003.

23           15.    GRID: The Parties agree that Staff, CUB and ICNU may retain the computers,  
24 loaded with the software to run the GRID model, previously loaned to them by the Company.  
25 The Company agrees to provide updates to the GRID model every six months from the effective  
26 date of the order in this docket. The Parties agree that the computer and GRID software may

1 only be utilized for the purpose of analyzing current and potential PacifiCorp filings. The  
2 Parties agree to maintain the confidentiality of the information related to the GRID model and  
3 inputs provided to them subject to the protective order in this case, notwithstanding the entry of  
4 a final order in this docket.

5 16. Interjurisdictional Allocation of Special Retail Contracts: The Parties agree that  
6 the interjurisdictional allocation issues associated with special retail contracts will have a  
7 negligible impact on this filing, and that, therefore, no allocation-related adjustment is necessary.  
8 In future Company filings, the Parties agree to allocate costs and revenues for special retail  
9 contracts on a situs-basis. The Parties agree, however, that the agreement contained in this  
10 paragraph may be superceded by any ultimate resolution of this issue by the Commission in  
11 other Commission proceedings addressing interjurisdictional allocations.

12 17. Amortization of Above Market Cost of Summer Forward Purchases: ICNU, Staff  
13 and PacifiCorp have agreed that PacifiCorp will establish a balancing account for the above-  
14 market costs (\$18.7 million) associated with the Company's forward purchases for the summer  
15 of 2002. ICNU, Staff and PacifiCorp further agree that PacifiCorp will be allowed to recover  
16 those costs by amortizing them for approximately one year until the balance in the account is  
17 zero. For purposes of settlement, the Parties agree that the summer forward purchases were  
18 prudent, but are not appropriately included when setting normalized base rates. CUB does not  
19 join in this paragraph of the Stipulation and will file a letter with the Commission separately  
20 stating its position on this particular issue. CUB will file this letter after this Stipulation and  
21 supporting testimony have been filed.

22 18. Effective Date: The Parties request the Commission approve this Stipulation, and  
23 order the rate changes proposed herein effective on June 1, 2002, with the exception of the rate  
24 change discussed in Paragraph 12, which will go into effect, if at all, as described in that  
25 Paragraph. Until June 1, 2002, the Company's power costs will be calculated according to the  
26 formula prescribed in the Bridge Stipulation, previously approved by the Commission. On the

1 day rates go into effect under this Stipulation, but in no event earlier than June 1, 2002, the rates  
2 set forth in the Bridge Stipulation will terminate.

3 19. Bridge Stipulation: The Parties agree that the Company has met its obligation  
4 under the Bridge Stipulation to develop a new hourly net power cost model and to base the  
5 UE 134 filing on that new model. This agreement in no manner reflects on the results of the  
6 independent audit requirement set forth in Paragraph 6 of the Bridge Stipulation. By entering  
7 into this Stipulation, the Parties are not indicating agreement about the appropriateness,  
8 functionality or any aspect of using the GRID model in any future case. The Parties do not  
9 waive their rights to challenge any aspect of the GRID model, including the use of the GRID  
10 model in any other proceeding.

11 20. Rate Spread and Design: The Parties agree that the revenue obligations of the  
12 various customer classes resulting from this Stipulation shall be spread among the classes in the  
13 manner described in Exhibit A attached hereto.

14 21. The Parties agree that this Stipulation is in the public interest and results in an  
15 overall fair, just and reasonable outcome.

16 22. The Parties agree that this Stipulation represents a compromise in the positions of  
17 the parties. As such, conduct, statements and documents disclosed in the negotiation of this  
18 Stipulation shall not be admissible as evidence in this or any other proceeding.

19 23. This Stipulation will be offered into the record of this proceeding as evidence  
20 pursuant to OAR 860-14-0085. The parties agree to support this Stipulation throughout this  
21 proceeding and any appeal, provide witnesses to sponsor this Stipulation at the hearing and  
22 recommend that the Commission issue an order adopting the settlements contained herein.

23 24. If this Stipulation is challenged by any other party to this proceeding, the Parties  
24 to this Stipulation reserve the right to cross-examine witnesses and put on such case as they deem  
25 appropriate to respond fully to the issues presented, including the right to raise issues that are  
26 incorporated in the settlements embodied in this Stipulation. Notwithstanding this reservation of

1 rights, the Parties to this Stipulation agree that they will continue to support the Commission's  
2 adoption of the terms of this Stipulation.

3 25. The Parties have negotiated this Stipulation as an integrated document. If the  
4 Commission rejects all or any material portion of this Stipulation or imposes additional material  
5 conditions in approving this Stipulation, any party disadvantaged by such action shall have the  
6 rights provided in OAR 860-014-0085 and shall be entitled to seek reconsideration or appeal of  
7 the Commission's Order.

8 26. By entering into this Stipulation, no party shall be deemed to have approved,  
9 admitted or consented to the facts, principles, methods or theories employed by any other party  
10 in arriving at the terms of this Stipulation. No party shall be deemed to have agreed that any  
11 paragraph of this Stipulation is appropriate for resolving issues in any other proceeding.

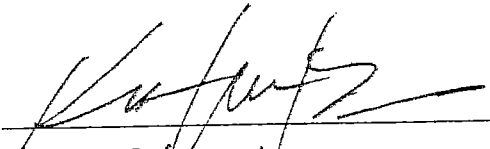
12 27. This Stipulation may be executed in counterparts and each signed counterpart shall  
13 constitute an original document.

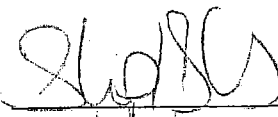
14 This Stipulation is entered into by each party on the date entered below such party's  
15 signature.

16 DATED: March 29, 2002.

17 PACIFICORP

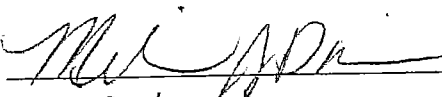
STAFF OF THE OREGON  
PUBLIC UTILITY COMMISSION

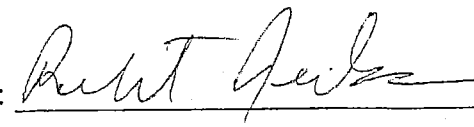
18  
19  
20 By:   
21 Date: 3/29/02

By:   
Date: 3/29/02

22 INDUSTRIAL CUSTOMERS OF  
23 NORTHWEST UTILITIES

CITIZENS' UTILITY BOARD

24  
25 By:   
26 Date: 3/29/02

By:   
Date: 3/29/02

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document upon the parties of record in this proceeding by first-class mail, addressed to said parties/attorneys' addresses as shown below:

Stephanie S. Andrus  
Oregon Department of Justice  
Room 100  
1162 Court Street, NE  
Salem, OR 97310-0560

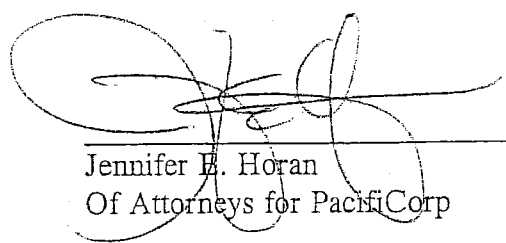
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6700 SE Yamhill  
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Jason Eisdorfer  
Citizens' Utility Board  
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Doug Larson  
Vice President, Regulation  
c/o Paul Wrigley  
PacifiCorp  
825 NE Multnomah, Ste. 800  
Portland, OR 97232-2153

Melinda J. Davison  
Davison Van Cleve PC  
1000 SW Broadway, Suite 2460  
Portland, Or 97205

DATED: March 29, 2002.

  
Jennifer E. Horan  
Of Attorneys for PacifiCorp



900 S.W. Fifth Avenue, Suite 2600  
Portland, Oregon 97204  
main 503.224.3380  
fax 503.220.2480  
www.stoel.com

JENNIFER E. HORAN  
Direct Dial (503) 294-9852  
email jehoran@stoel.com

March 29, 2002

**BY FACSIMILE**

Administrative Hearings Division  
Oregon Public Utility Commission  
550 Capitol Street NE, Suite 215  
Salem, OR 97301-2551

**Re: Docket UE 134 / UM 1047**

Attached please find Exhibit A to the Stipulation filed in Dockets UE 134/UM 1047 earlier today. This Exhibit was inadvertently omitted from the copy filed earlier today.

Please call if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to be 'J. Horan', written over a horizontal line.

Jennifer E. Horan

JEH:jlf

Enclosures

cc: Service List

Oregon  
Washington  
California  
Utah  
Idaho

**PACIFIC POWER & LIGHT COMPANY**  
**ESTIMATED EFFECT OF PROPOSED PRICE CHANGES**  
**ON REVENUES FROM ELECTRIC SALES TO ULTIMATE CONSUMERS**  
**DISTRIBUTED BY RATE SCHEDULES IN OREGON**  
**12 MONTHS ENDED DECEMBER 31, 2001**

Line No.	Proposed Schedule	Description (1)	N <sub>o</sub> .	Average Customers (3)	MWh (4)	Base Prices <sup>2</sup> (5)	Present Revenues (\$000)		Base Rate Adjust (8)	RMA Adjust (9)	Power Cost (10)	Horniston Adjust (11)	Trail Mountain (12)	Total (13)	% Change (14) (13)/(5)
							Adlders (6)	Net (7) (5) + (6)							
<b>Residential</b>															
1	4	Residential	4	427,410	5,240,586	\$381,236	(\$35,859)	\$345,377	(\$1,617)	\$2,142	\$7,370	(\$2,203)	\$1,025	\$6,717	1.76%
<b>Commercial &amp; Industrial</b>															
2	15	Outdoor Area Lighting Service	15	8,891	14,220	\$1,609	(\$48)	\$1,561	(\$5)	\$37	\$13	(\$18)	\$2	\$29	1.76%
3	54	Recreational Field Lighting	54	109	1,033	\$86	\$3	\$89	\$0	\$2	\$1	(\$1)	\$0	\$2	1.76%
4	25	General Service < 1,000 kW	25	72,210	2,104,131	\$137,838	\$338	\$138,176	(\$618)	\$159	\$3,046	(\$581)	\$423	\$2,429	1.76%
5	27	Gen. Svc. < 1,000 kW (Opt.)	27	2,664	2,088,120	\$111,270	\$804	\$112,074	(\$541)	(\$568)	\$2,976	(\$321)	\$414	\$1,960	1.76%
6	48	Large General Service > 1,000 kW	48	209	3,986,022	\$152,525	\$5,394	\$157,919	(\$832)	(\$1,816)	\$4,816	(\$150)	\$670	\$2,688	1.76%
7	36	Partial Req. Svc. < 1,000 kW	36	2	24	\$19	\$0	\$19	\$0	\$0	\$0	\$0	\$0	\$1	1.76%
8	47	Partial Req. Svc. > 1,000 kW	47	5	185,166	\$7,142	\$279	\$7,421	(\$39)	(\$82)	\$224	(\$8)	\$31	\$126	1.76%
9	41	Agricultural Pumping Service total customers:	41	2,712	120,106	\$7,823	(\$927)	\$6,896	(\$41)	\$62	\$165	(\$71)	\$23	\$138	1.76%
10	--	Agricultural Pumping - Other	--	1,976	99,901	\$655	(\$488)	\$167	\$0	\$0	\$0	\$0	\$0	\$0	0.00%
11	400	Special Contracts	400	1	160,086	\$7,933	\$0	\$7,933	\$0	\$0	\$0	\$0	\$0	\$0	0.00%
12	400	Special Contracts - Tariff-Based	400	1	32,624	\$1,595	\$44	\$1,639	(\$7)	(\$28)	\$55	\$0	\$8	\$28	1.76%
13		<b>Total Commercial &amp; Industrial</b>		<b>88,780</b>	<b>8,791,433</b>	<b>\$428,495</b>	<b>\$5,399</b>	<b>\$433,894</b>	<b>(\$2,083)</b>	<b>(\$2,234)</b>	<b>\$11,296</b>	<b>(\$1,149)</b>	<b>\$1,571</b>	<b>\$7,400</b>	<b>1.73%</b>
<b>Public Street Lighting</b>															
14	50	Street Lighting Service	50	337	13,851	\$1,302	\$17	\$1,319	(\$4)	\$30	\$11	(\$15)	\$1	\$23	1.76%
15	51	Street Lighting Service HPS	51	657	14,953	\$2,224	\$4	\$2,228	(\$7)	\$51	\$18	(\$25)	\$2	\$39	1.76%
16	52	Street Lighting Service	52	117	2,145	\$244	\$2	\$246	(\$1)	\$6	\$2	(\$3)	\$0	\$4	1.76%
17	53	Street Lighting Service	53	212	8,381	\$405	\$15	\$420	(\$1)	\$9	\$3	(\$5)	\$0	\$7	1.76%
18		<b>Total Public Street Lighting</b>		<b>1,323</b>	<b>39,330</b>	<b>\$4,175</b>	<b>\$38</b>	<b>\$4,213</b>	<b>(\$13)</b>	<b>\$96</b>	<b>\$34</b>	<b>(\$48)</b>	<b>\$5</b>	<b>\$74</b>	<b>1.77%</b>
19		<b>Total Sales to Ultimate Consumers</b>		<b>517,513</b>	<b>14,071,349</b>	<b>\$813,906</b>	<b>(\$30,422)</b>	<b>\$783,484</b>	<b>(\$3,713)</b>	<b>\$4</b>	<b>\$18,700</b>	<b>(\$3,400)</b>	<b>\$2,600</b>	<b>\$14,191</b>	<b>1.74%</b>
20		Employee Discount			21,189	(\$411)	\$6	(\$405)	\$2	(\$21)	(\$8)	\$2	(\$1)	(\$7)	1.68%
21		<b>Total Sales with Employee Discount</b>				<b>\$813,495</b>	<b>(\$30,416)</b>	<b>\$783,079</b>	<b>(\$3,711)</b>	<b>\$2</b>	<b>\$18,692</b>	<b>(\$3,398)</b>	<b>\$2,599</b>	<b>\$14,184</b>	<b>1.74%</b>

<sup>1</sup> Excludes effects of the Low Income Bill Payment Assistance Charge (Schedule 91)  
<sup>2</sup> Includes RMA Adjustment



Pre-UCAP  
State of Oregon  
2001 Unbonded Revenue Requirement Allocation by Rate Schedule

Line	Description	(A) Residential (sec)	(B) General Service Sub 25 (sec)	(C) General Service Sub 25 (pri)	(D) General Service Sub 27 (sec)	(E) General Service Sub 27 (pri)	(F) Large Power Service Schedule 48T (sec)	(G) Large Power Service Schedule 48T (pri)	(H) Schedule 41 Ingration (sec)	(I) Schedule 41 Ingration (pri)	(J) Street Lighting (sec)	(K) Street Lighting (pri)	(L) Sch 36 (sec)	(M) Sch 47 (sec)	(N) Sch 47 (pri)	(O) Sch 47 (pri)	(P) Sch 47 (pri)	(Q) Sch 400 (pri)	(R) Sch 400 (pri)	(S) URSRB (pri)	Total
1	Revenues before Adders	\$396,748	\$132,997	\$338	\$103,085	\$4,715	\$37,709	\$79,002	\$27,284	\$10,354	\$3,727	\$19	\$1,208	\$5,449	\$89	\$5,170	\$1,525	\$7,933	\$655	\$815,939	
2	MWU	\$2,106,652	2,098,080	6,051	1,990,476	97,643	895,679	2,210,385	879,958	119,539	5,667	24,367									
3	Functionalized 20 Year Full Marginal Costs - Class 5	\$174,365	\$71,858	\$195	\$67,248	\$1,156	\$21,820	\$62,737	\$21,381	\$1,885	\$18	\$518	\$11	\$891	\$4,378	\$76	\$602	\$1,307	\$0	\$0	\$0
4	Generation	\$77,327	\$11,679	\$32	\$10,765	\$504	\$4,013	\$8,450	\$3,031	\$394	\$3	\$28									\$0
5	Transmission	\$228,127	\$19,444	\$54	\$20,954	\$860	\$1,720	\$5,474	\$2,349	\$1,491	\$15	\$128									\$0
6	Distribution	\$9,885	\$1,572	\$5	\$1,411	\$54	\$103	\$68	\$20	\$10	\$0										\$0
7	Customer - Billing	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0										\$0
8	Customer - Metering	\$5,000	\$2,862	\$13	\$2,849	\$75	\$17	\$10	\$5	\$1	\$8										\$0
9	Customer - Other	\$5,080	\$302	\$30	\$272	\$2	\$22	\$14	\$1	\$56	\$8										\$0
10	Customer - Other	\$5,080	\$302	\$30	\$272	\$2	\$22	\$14	\$1	\$56	\$8										\$0
11	Total	\$7,607,703	\$12,761,717	\$315	\$99,673	\$4,581	\$56,716	\$76,834	\$36,460	\$9,933	\$28	\$2,664	\$18	\$1,176	\$5,300	\$86	\$3,097	\$1,479	\$0	\$0	\$0
12	Functional Revenue Requirement Allocation Factors																				
13	Functionalized 20 Year Full Marginal Costs - Class 5 of Total	100.00%	16.51%	0.04%	15.65%	0.71%	6.39%	14.02%	5.37%	0.89%	0.00%	0.00%	0.00%	0.20%	0.99%	0.02%	0.14%	0.30%	0.00%	0.00%	0.00%
14	Generation	100.00%	12.46%	0.05%	16.18%	0.76%	6.03%	12.70%	4.56%	0.89%	0.00%	0.04%	0.00%	0.00%	0.07%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%
15	Transmission	100.00%	17.89%	0.02%	9.18%	0.17%	2.07%	2.40%	0.00%	3.11%	0.00%	0.92%	0.00%	0.00%	0.07%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%
16	Distribution	100.00%	16.51%	0.04%	15.65%	0.71%	6.39%	14.02%	5.37%	0.89%	0.00%	0.17%	0.00%	0.00%	0.07%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%
17	Auxiliary Billing	100.00%	82.35%	0.01%	11.77%	0.03%	0.86%	0.57%	0.02%	1.72%	0.00%	0.17%	0.00%	0.00%	0.00%	0.00%	0.17%	0.00%	0.00%	0.00%	0.00%
18	Customer - Billing	100.00%	74.11%	0.26%	3.93%	0.58%	0.29%	0.70%	0.35%	2.11%	0.02%	0.01%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%
19	Customer - Metering	100.00%	84.02%	0.01%	1.02%	0.03%	0.36%	0.24%	0.01%	0.92%	0.00%	0.14%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%
20	Customer - Other	100.00%	38.61%	0.04%	14.88%	0.72%	6.60%	16.30%	6.49%	0.88%	0.00%	0.18%	0.00%	0.00%	0.00%	0.00%	0.18%	0.00%	0.00%	0.00%	0.00%
21	Embedded DSM - (mWh)	100.00%	16.75%	0.04%	12.86%	0.59%	4.75%	9.95%	3.44%	1.29%	0.00%	0.34%	0.00%	0.00%	0.00%	0.00%	0.34%	0.00%	0.00%	0.00%	0.00%
22	Regulatory & Franchise																				
23	Taxes (Revenue)																				
24	Base Rate Revenue Requirement Change																				
25	Power Cost	(\$1,000)	(\$311)	(\$1)	(\$290)	(\$14)	(\$119)	(\$266)	(\$100)	(\$17)	(\$0)	(\$3)	(\$0)	(\$4)	(\$19)	(\$0)	(\$3)	(\$0)	(\$0)	(\$0)	(\$1,005)
26	Trail Mountain Adjustment	(\$1,000)	(\$509)	(\$0)	(\$1,688)	(\$8)	(\$59)	(\$154)	(\$59)	(\$10)	(\$0)	(\$2)	(\$0)	(\$2)	(\$11)	(\$0)	(\$2)	(\$0)	(\$0)	(\$0)	(\$1,005)
27	Subtotal (G)	(\$1,000)	(\$509)	(\$0)	(\$1,688)	(\$8)	(\$59)	(\$154)	(\$59)	(\$10)	(\$0)	(\$2)	(\$0)	(\$2)	(\$11)	(\$0)	(\$2)	(\$0)	(\$0)	(\$0)	(\$1,005)
28	Itemization Distribution Adjustment	(\$700)	(\$119)	(\$0)	(\$358)	(\$21)	(\$22)	(\$43)	(\$43)	(\$4)	(\$0)	(\$5)	(\$0)	(\$1)	(\$2)	(\$0)	(\$5)	(\$0)	(\$0)	(\$0)	(\$700)
29	Total Change in Base Rates	(\$3,700)	(\$1,717)	(\$0)	(\$310)	(\$24)	(\$210)	(\$905)	(\$158)	(\$41)	(\$0)	(\$8)	(\$0)	(\$7)	(\$32)	(\$0)	(\$8)	(\$0)	(\$0)	(\$0)	(\$3,700)
30	Total Base Rate Revenue Requirement	\$790,191	\$132,280	\$337	\$101,569	\$4,691	\$37,499	\$76,539	\$37,126	\$10,213	\$30	\$2,719	\$19	\$1,201	\$5,417	\$89	\$3,161	\$1,518	\$7,933	\$655	\$810,227
31	Increase or (Decrease)	(\$3,700)	(\$1,717)	(\$0)	(\$310)	(\$24)	(\$210)	(\$905)	(\$158)	(\$41)	(\$0)	(\$8)	(\$0)	(\$7)	(\$32)	(\$0)	(\$8)	(\$0)	(\$0)	(\$0)	(\$3,700)
32	(Line 33 - Line 1)																				
33	Percent Increase (Decrease)		-0.46%	-0.65%	-0.51%	-0.22%	-0.56%	-0.58%	-0.58%	-0.40%	-0.35%	-0.30%	-0.04%	-0.57%	-0.59%	-0.15%	-0.70%	-0.46%	0.00%	0.00%	-0.46%
34	(Line 35 / Line 1)																				
35	Power Cost Surcharge (G)	18,700,000	\$3,037,443	\$8,251	\$2,842,569	\$133,408	\$1,175,959	\$3,651,897	\$988,319	\$161,211	\$742	\$21,884	\$463	\$37,677	\$182,925	\$3,217	\$25,439	\$55,240	\$0	\$0	\$18,700,000
36	Hermion Surcharge (D)	(\$3,400,000)	(\$2,202,911)	(\$792)	(\$108,300)	(\$12,560)	(\$69,451)	(\$80,542)	\$0	(\$70,943)	(\$78)	(\$30,711)	(\$44)	(\$2,225)	(\$5,556)	\$0	(\$35,723)	\$0	\$0	\$0	(\$3,400,000)
37	Trail Mountain Surcharge (G)	2,600,000	\$1,021,756	\$1,147	\$395,223	\$18,449	\$163,502	\$368,713	\$137,413	\$22,831	\$103	\$3,043	\$64	\$5,239	\$25,433	\$447	\$3,637	\$7,680	\$0	\$0	\$2,600,000

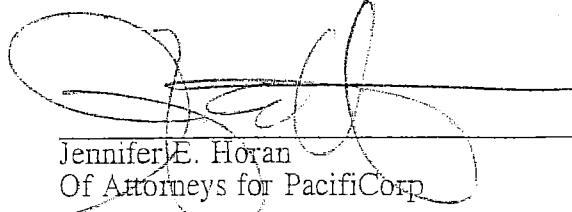


1           The Parties have now reached a settlement and executed a Stipulation resolving all  
2 outstanding issues in this case among all parties. That Stipulation is being filed today.  
3 However, the Parties require a short extension of time to finalize and file testimony supporting  
4 the Stipulation. Accordingly, the Parties request that the Commission allow the Parties until  
5 April 8, 2002 to file supporting testimony. The Stipulation proposes an effective date of  
6 June 1, 2002. Accordingly, there appears to be sufficient time in the schedule to allow the  
7 Parties one additional week to file supporting testimony.

8           Staff, CUB and ICNU support this request for additional time.

9           DATED: March 29, 2002.

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Jennifer E. Horan  
Of Attorneys for PacifiCorp

CERTIFICATE OF SERVICE

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26

I hereby certify that I served a copy of the foregoing document upon the parties of record in this proceeding by first-class mail, addressed to said parties/attorneys' addresses as shown below:

Stephanie S. Andrus  
Oregon Department of Justice  
Room 100  
1162 Court Street, NE  
Salem, OR 97310-0560

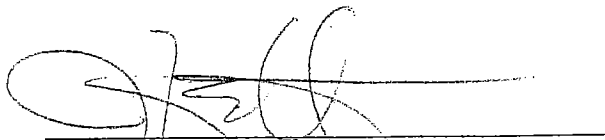
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825 NE Multnomah, Ste. 800  
Portland, OR 97232-2153

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Davison Van Cleve PC  
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Portland, Or 97205

DATED: March 29, 2002.

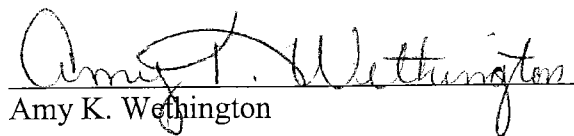


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Jennifer E. Horan  
Of Attorneys for PacifiCorp

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Motion to Consolidate and Rehear or Reopen Docket of Washington Utilities and Transportation Commission Staff, Public Counsel, Industrial Customers of Northwest Utilities, Northwest Energy Coalition, and Opportunity Counsel/Energy Project upon each party on the official service lists by causing the same to be mailed, postage-prepaid, through the U.S. Mail. Dated at Portland, Oregon, this 10<sup>th</sup> day of May, 2002.

  
Amy K. Wethington