

January 13, 2017

***VIA ELECTRONIC FILING***

Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: Docket A-130355—Pacific Power & Light Company’s Comments**

In response to the Notice of Opportunity to File Written Comments issued by the Washington Utilities and Transportation Commission (Commission) on December 7, 2016, Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits the following written comments on the draft rules for WAC Chapter 480-07.

**Part I—General Provisions**

- **WAC 480-07-140(3) and WAC 480-07-140(6)(b):** Pacific Power continues to recommend excluding workpapers from the requirement that cover letters include identification of all submitted documents by file name. This requirement is exceptionally burdensome with certain filings, like rate cases, that include hundreds of supporting workpapers.

Included as Attachment A is an example of a list of documents submitted as part of the Company’s 2013 general rate case. Putting together an index of the workpapers down to the file name, as provided in Attachment A, provides little value to Commission staff or stakeholders, but imposes a significant burden on utilities that are trying to finalize rate cases and other voluminous filings. Pacific Power requests the Commission to consider excluding workpapers from this requirement, or provide a less burdensome alternative such as allowing utilities to provide an outline of the folder organization for workpapers.

- **WAC 480-07-140(6)(a)(ii):** Pacific Power recommends allowing flexibility in utilizing “hidden cells” for spreadsheet formats. Lines and columns are often hidden to present the most relevant information in an otherwise expansive spreadsheet, or to format spreadsheets for effective printing. These types of formatting modifications do not truly “hide” information because the presence of the information is ascertainable and the information itself is easily viewable.

Taking away the ability to format spreadsheets in this manner will, in many instances, result in overly complex, cluttered, and unprintable exhibits and workpapers. Furthermore, confirming compliance with this requirement would obligate utilities to manually inspect hundreds of spreadsheets per year before filing with the Commission.

- **WAC 480-07-160(2)(a):** The proposed rule changes retain robust protections for most types of confidential information. The rules, however, fail to adequately protect utility customers' personal, financial, or contact information. The rules exclude customers' personal, financial, and contact information from the definition of "confidential information" even though such information is exempt from public disclosure under RCW 42.56.330(3). Utilities would be required to submit confidential customer information, then provide redacted copies after the fact, but only upon a request by the Commission. This proposed exclusion hampers utilities' ability to safeguard their customers' sensitive information and conflicts with increasing public concern about the security of personal information. Indeed, it compels utilities to produce confidential customer information, and only allows for after-the-fact redaction if requested by the Commission.

Furthermore, the proposed rules are internally contradictory. The prefatory paragraph of WAC 480-07-160 expressly excludes customer confidential information from protection as "confidential information." But WAC 480-07-160(2) suggests that certain types of customer information (specifically, customer-specific usage information) qualifies as "confidential information." It is unclear why the proposed rules would protect customer-specific usage information while not similarly protecting customers' confidential personal or financial information.

Pacific Power strongly encourages the Commission to adopt rules that protect customer personal, financial, and contact information as confidential information.

- **WAC 480-07-160(4)(d)(ii) and (iii):** This subsection requires each page of an electronic document with confidential or highly confidential information to specifically highlight the specific information that is so designated. Similar to the changes to the Public Utility Commission of Oregon recently made to its general protective order, Pacific Power recommends including a "reasonable efforts" standard with respect to designating the specific information within a page that is confidential or highly confidential.<sup>1</sup> In some circumstances (e.g., disclosing extremely voluminous modeling databases as part of the integrated resource planning process) it is not feasible to designate specific cells within the hundreds of spreadsheets that comprise the database. Put another way, there are circumstances where the volume or extensive content of submitted documents would make it unreasonable for the disclosing party to designate with specificity. In such cases, the balance should tip in favor of protecting confidential or highly confidential information.
- **WAC 480-07-160(5):** The proposed rules eliminate the opportunity for parties to resolve disputes regarding challenges to confidential information designations at the Commission. Under the proposed rules, parties who designate confidential information will be required to obtain a court order within ten days if another party challenges the confidential designation. If no order is obtained within that short timeframe, the contested information will no longer be treated as confidential. This framework

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<sup>1</sup> See Order No. 15-243, Docket No. AR 587 at 2 (Aug. 25, 2015) (adding language to the general protective order "requiring a designating party to use reasonable efforts to ensure that any designated information continues to warrant protection.")

drastically departs from the Commission's current rules, where parties may resolve disputes regarding confidential designations via briefing at the Commission, and imposes a significant burden on parties seeking to protect confidential information. The Commission should retain the current framework where disputes regarding confidential designations are resolved before the Commission, rather than requiring designating parties to obtain judicial relief in an extraordinarily short timeframe. Specifically, the Commission should retain the following language:

When a challenge is made, the commission will provide an opportunity to respond before ruling on the challenge. If a confidential designation is challenged, the provider of the confidential information bears the burden to show that part or all of a document should be protected from disclosure under chapter 42.56 RCW, RCW 80.04.095, or a protective order.

- **WAC 480-07-160(6)**: This provision addresses requests for confidential information, and states:

Subject to the requirements of this subsection, the Commission will release information designated as confidential or highly-confidential in response to a written request for public records made in compliance with WAC 480-04-090.

This provision focuses on the validity of the request, not on whether the information is disclosable. To avoid any ambiguity, the following language should be revised as follows:

Subject to the requirements of this subsection, the Commission will release information designated as confidential or highly-confidential in response to a written request for public records made in compliance with WAC 480-04-090, **unless release is prohibited by law, rule, or Commission order.**

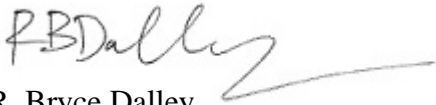
### **Part IIIA—Procedural Rules**

- **480-07-305(5)(b)**: In the list of circumstances under which the Commission will not commence an adjudicative proceeding, Pacific Power requests that the Commission consider adding the circumstances where the party seeking to commence the proceeding is not “a person involved in an actual case or controversy” or otherwise aggrieved as required under WAC 480-07-305(2). The list, which appears exhaustive, incorporates the concepts of jurisdiction and ripeness, so standing seems an appropriate content to include. *See* WAC 480-07-355(4) (allowing the Commission to dismiss an intervenor from a proceeding who “has no substantial interest in the proceeding....”)
- **480-07-400(c)(iii) “Discovery”**: Pacific Power continues to request the revised rules to include a “reasonable efforts” standard as well as a provision for models that are obsolete, no longer available, or no longer in use by the Company. This requirement may

be burdensome or impractical in certain circumstances.

Pacific Power appreciates the Commission's efforts to update and clarify its procedural rules, as well as the opportunity to participate in the process. Please direct inquiries to Ariel Son, Regulatory Projects Manager, at (503) 813-5410.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Bryce Dalley", with a long horizontal flourish extending to the right.

R. Bryce Dalley  
Vice President, Regulation

## ATTACHMENT A

**PacifiCorp d/b/a Pacific Power & Light Company (PAC)**  
**General Rate Case - Index of Files on CD**  
**January 11, 2013**

**CD.1 WA UE-13\_ Initial Filing and Workpapers**

- A. UE-13\_PAC Index of Files on CD (Jan 2013)
  - UE-13\_PAC Index of Files on CD (PACJan2013).docx
  - UE-13\_PAC Index of Files on CD (PACJan2013).pdf
  
- B. UE-13\_PAC Cover Letter (Jan 2013)
  - UE-13\_PAC Cover Letter (PACJan2013).docx
  - UE-13\_PAC Cover Letter (PACJan2013).pdf
  - UE-13\_PAC Cover Letter Attach A (PACJan2013).docx
  - UE-13\_PAC Cover Letter Attach A (PACJan2013).pdf
  - UE-13\_PAC Cover Letter Attach B (PACJan2013).doc
  - UE-13\_PAC Cover Letter Attach B (PACJan2013).pdf
  - UE-13\_PAC Cover Letter Attach C (PACJan2013).pdf
  - UE-13\_PAC Cover Letter Attach C (PACJan2013).xlsx
  - UE-13\_PAC Exhibit A to Proposed Protective Order (PACJan2013).docx
  - UE-13\_PAC Exhibit A to Proposed Protective Order (PACJan2013).pdf
  - UE-13\_PAC Motion for Standard Protective Order (PACJan2013).docx
  - UE-13\_PAC Motion for Standard Protective Order (PACJan2013).pdf
  
- C. UE-13\_PAC Application Summary (Exhibit A) (Jan 2013)
  - UE-13\_PAC Cover Letter Attach A (PACJan2013).docx
  - UE-13\_PAC Cover Letter Attach A (PACJan2013).pdf
  
- D. UE-13\_PAC Certificate of Service (Jan 2013)
  - UE-13\_PAC Certificate of Service (PACJan2013).doc
  - UE-13\_PAC Certificate of Service (PACJan2013).pdf
  
- E. UE-13\_PAC Tariffs (Jan 2013)

Clean	Legislative
15-1.REV.docx	15-1.LEG.docx
16-1.REV.docx	16-1.LEG.docx
17-1.REV.docx	17-1.LEG.docx
18-1.REV.docx	18-1.LEG.docx
24-1.REV.docx	24-1.LEG.docx
24-2.REV.docx	24-2.LEG.docx
33-1.REV.docx	33-1.LEG.docx
36-1.REV.docx	36-1.LEG.docx
36-2.REV.docx	36-2.LEG.docx
40-1.REV.docx	40-1.LEG.docx
47T-1.REV.docx	47T-1.LEG.docx
48T-1.REV.docx	48T-1.LEG.docx
51-1.REV.docx	51-1.LEG.docx
52-1.REV.docx	52-1.LEG.docx
53-1.REV.docx	53-1.LEG.docx
54-1.REV.docx	54-1.LEG.docx
57-1.REV.docx	57-1.LEG.docx
57-2.REV.docx	57-2.LEG.docx
94-1.NEW.docx	94-1.LEG.docx

94-2.NEW.docx	94-2.LEG.docx
300-1.REV.docx	300-1.LEG.docx
300-2.REV.docx	300-2.LEG.docx
INDEX.3.REV.docx	INDEX.3.LEG.docx
R6.2.REV.docx	R6.2.LEG.docx
R6.3.REV.docx	R6.3.LEG.docx

UE-13\_Steward Exhibit No.\_\_(JRS-2)(PACJan2013).pdf

F. UE-13\_PAC Other (Jan 2013)

UE-13\_PAC 10Q 10K

UE-13\_PAC 3-31-12 10-Q (PACJan2013).pdf

UE-13\_PAC 6-30-12 10-Q (PACJan2013).pdf

UE-13\_PAC 9-30-12 10-Q (PACJan2013).pdf

UE-13\_PAC 12-31-10 10-K (PACJan2013).pdf

UE-13\_PAC 12-31-11 10-K (PACJan2013).pdf

UE-13\_PAC Affiliated Interest

UE-13\_PAC 2011 Affiliated Interest Report REDACTED.pdf

UE-13\_PAC 2011 Supplement.xlsx

UE-13\_PAC Debt Issuance Prospectus

UE-13\_PAC Final ProSupp (1-3-12)(PACJan2013).pdf

UE-13\_PAC ProSupp (First Mortgage Bonds 2022)(PACJan2013).pdf

UE-13\_PAC FERC Form 1

UE-13\_FERC Form No. 1 2011 (PACJan2013).pdf

G. UE-13\_PAC Workpapers (Jan 2013)

UE-13\_Workpaper Index (PACJan2013).docx

UE-13\_Workpaper Index (PACJan2013).pdf

01 Hadaway Workpapers

Hadaway\_Workpapers.pdf

02 Williams Workpapers

2013 WA GRC Cap Structure.xls

Ltd 6-30-13 pro forma – wo non-wca PCBs.xlsx

Moody's Infrastructure Finance 08-2009.pdf

Standard&Poor's RatingsDirect 3-11-2010.pdf

Williams workpapers 1.pdf

Williams workpapers 2.pdf

Williams workpapers 3.pdf

Williams workpapers 4.pdf

03 Brown Workpapers

KAB tables graphs and numbers.xlsx

KAB UE-100749 Novak Testimony Redacted.pdf

04 Duvall Workpapers

\_Table 1 – NPC In Rates vs Actual.xlsx

\_WA GRC Testimony Support Index.xlsx

PSE QF Prices\_UE-111048\_UG-111049.xls

05 Ralston Workpapers

APR90000565\_Detail Doc.xls

APR90000565\_Econ\_Model-2-21-12.xls

APR90000565\_Proj\_Proposal\_Document.doc

GEGen&TrnsfmrFinalStudyReport.pdf

JBPVRR(d).docx

## 06 Stuver Workpapers

Stuver Investor Supply Working Capital Workpaper.xlsx

## 07 McDougal Workpapers

### 3 – Revenue

3.1-3.3 – Revenue Adjustments.xlsx

3.4 – SO2 Emissions Allowances.xlsx

3.5 – REC and REA Revenue.xlsx

3.6 – Wheeling Revenue.xlsx

3.7 – Anxillary Revenue.xlsx

3.8 – Schedule 300 Fee Change.xlsx

### 4 – O&M

4.1 – Misc. General Expense and Revenue.xlsx

4.2-4.3 – General Wage Increase.xlsx

4.4 – Irrigation Load Control Program.xlsx

4.5 – Remove Non-recurring Entries.xlsx

4.6 – Pension Curtailment.xlsx

4.7 – DSM Expense and Removal.xlsx

4.8 – Insurance Expense.xlsx

4.9 – Advertising.xlsx

4.10 – Memberships and Subscriptions.xlsx

4.11 – AMR.xlsx

4.12 – Uncollectible Expense.xlsx

4.13 – Legal Expenses.xlsx

4.14 – Naughton Write Off.xlsx

4.15 – O&M Efficiency.xlsx

### 5 – NPC

5.1-5.1.1 – Net Power Costs.xlsx

5.2 – James River Royalty Offset.xlsx

5.3 – BPA Residential Exchange.xlsx

5.4 – Colstrip #3 Removal.xlsx

### 6 – Dep & Amort

6.1 – Hydro Decommissioning.xlsx

6.2 – Dep and Amort Reserve to June 2012 Balance.xlsx

6.3 – Proposed Depreciation Rates.xlsx

### 7 – Tax

7.2 – Property Tax.xlsx

7.3 – Renewable Energy Tax Credit.xlsx

7.4 – ADIT Balance.xlsx

7.5 – Low Income Tax Credit.xlsx

7.6 – WA Flow-through.xlsx

7.7 – Remove Deferred State Tax Expense and Balance.xlsx

7.8 – WA Public Utility Tax.xlsx

7.9 – AFUDC.xlsx

### 8 – Rate Base

8.1 – Bridger Mine Rate Base.xlsx

8.2 – Environmental Settlement (PERCO).xlsx

8.3 – Customer Advances for Construction.xlsx

8.4 – Major Plant Additions.xlsx

8.5 – Misc. Rate Base.xlsx

8.6 – Powerdale.xlsx

8.7 – Removal of Colstrip #4.xlsx

8.8 – Trojan Unrecovered Plant.xlsx



8.9 – Customer Service Deposits.xlsx  
8.10 – Regulatory Asset Amortization.xlsx  
8.11 – Misc. Asset Sales and Removals.xlsx  
8.12 – Adjust June 2012 AMA Plant Balances to June 2012 Balance.xlsx  
8.13 – Investor Supplied Working Capital.xlsx

9 – Production Factor

9.1 – Production Factor.xlsx

B-Tabs

B1 – Electric Operating Revenue.xls  
B2 – Operations & Maintenance Expense.xls  
B3 – Depreciation Expense.xls  
B4 – Amortization Expense.xls  
B5 – Taxes Other than Income.xls  
B6 – Interest Expense and RETC.xls  
B7 – DIT Expense.xls  
B7 – ITC Amortization.xls  
B8 – Electric Plant in Service.xls  
B9 – Capital Lease.xls  
B10 – Plant Held for Future Use.xls  
B11 – Misc Deferred Debits.xls  
B13 – Materials and Supplies.xls  
B14 – CWC.xls  
B15 – Misc Rate Base.xls  
B16 – Reg Assets.xls  
B17 – Depreciation Reserve.xls  
B18 – Amortization Reserve.xls  
B19 – DIT Balance.xls  
B19 – ITC Balance.xls  
B20 – Customer Advances.xls

Filed Models

2013 WA GRC JAM – WCA June 2012.xls

2013 WA GRC RAM – WCA June 2012.xls

2013 WA GRC Tax Model.xlsx

Revenue Requirement Summary Model – 2013 WA GRC.xlsx

Revenue Requirement Workpaper Approved Factors.xlsx

Revenue Requirement Workpaper FERC Form 1 Data by Month.xlsx

Revenue Requirement Workpaper Flow Chart.xlsx

Revenue Requirement Workpaper Summary.docx

WA WCA Allocation Manual\_2013.pdf

08 Coughlin Workpapers

WA 2013 GRC Schedule 300 Cost Analysis.xlsx

09 Paice Workpapers

Paice Workpaper – Peak Credit Calculation.xlsx

10 Steward Workpapers

JRS-1T Table 1 Workpaper.xlsx

UE-111190\_Exhibit\_(DJR-3).pdf

UE-111880 BCP\_Report\_1-31-12.pdf

WA 2013 GRC exhibits.xlsx

**CD.2 WA UE-13\_PAC Testimony and Exhibits**

A. UE-13\_Reiten (PACJan2013)

UE-13\_Reiten Testimony Exhibit No \_\_\_\_ (RPR-1T)(PACJan2013).docx

UE-13\_Reiten Testimony Exhibit No. \_\_\_\_ (RPR-1T)(PACJan2013).pdf

UE-13\_Reiten Exhibit No.\_\_(RPR-2)(PACJan2013).docx  
UE-13\_Reiten Exhibit No.\_\_(RPR-2)(PACJan2013).pdf

B. UE-13\_Hadaway (PACJan2013)

UE-13\_Hadaway Testimony Exhibit No.\_\_(SCH-1T)(PACJan2013).docx  
UE-13\_Hadaway Testimony Exhibit No.\_\_(SCH-1T)(PACJan2013).pdf  
UE-13\_Hadaway Appendix A \_\_(SCH)(PACJan2013).doc  
UE-13\_Hadaway Appendix A \_\_(SCH)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-2)(PACJan2013).doc  
UE-13\_Hadaway Exhibit No.\_\_(SCH-2)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-3)(PACJan2013).xls  
UE-13\_Hadaway Exhibit No.\_\_(SCH-3)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-4)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-4)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-5)(PACJan2013).xls  
UE-13\_Hadaway Exhibit No.\_\_(SCH-5)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-6)(PACJan2013).xls  
UE-13\_Hadaway Exhibit No.\_\_(SCH-6)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-7)(PACJan2013).xls  
UE-13\_Hadaway Exhibit No.\_\_(SCH-7)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-8)(PACJan2013).xls  
UE-13\_Hadaway Exhibit No.\_\_(SCH-8)(PACJan2013).pdf  
UE-13\_Hadaway Exhibit No.\_\_(SCH-9)(PACJan2013).xls  
UE-13\_Hadaway Exhibit No.\_\_(SCH-9)(PACJan2013).pdf

C. UE-13\_Williams (PACJan2013)

UE-13\_Williams Testimony Exhibit No.\_\_(BNW-1T)(PACJan2013).DOCX  
UE-13\_Williams Exhibit No.\_\_(BNW-2)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-3)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-4)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-5)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-6)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-7)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-8)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-9)(PACJan2013).xlsx  
UE-13\_Williams Exhibit No.\_\_(BNW-9)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-10)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-11)(PACJan2013).xlsx  
UE-13\_Williams Exhibit No.\_\_(BNW-11)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-12)(PACJan2013).xlsx  
UE-13\_Williams Exhibit No.\_\_(BNW-12)(PACJan2013).pdf  
UE-13\_Williams Exhibit No.\_\_(BNW-13)(PACJan2013).xlsx  
UE-13\_Williams Exhibit No.\_\_(BNW-13)(PACJan2013).pdf

D. UE-13\_Dalley (PACJan2013)

UE-13\_Dalley Testimony Exhibit No.\_\_(RBD-1T)(PACJan2013).docx  
UE-13\_Dalley Testimony Exhibit No.\_\_(RBD-1T)(PACJan2013).pdf  
UE-13\_Dalley Exhibit No.\_\_(RBD-2)(PACJan2013).docx  
UE-13\_Dalley Exhibit No.\_\_(RBD-2)(PACJan2013).pdf

E. UE-13\_Brown (PACJan2013)

UE-13\_Brown Testimony Exhibit No.\_\_(KAB-1T)(PACJan2013).docx

UE-13\_Brown Testimony Exhibit No.\_\_(KAB-1T)(PACJan2013).pdf

F. UE-13\_Duvall (PACJan2013)

UE-13\_Duvall Redacted Testimony Exhibit No.\_\_(GND-1CT)(PACJan2013).docx

UE-13\_Duvall Redacted Testimony Exhibit No.\_\_(GND-1CT)(PACJan2013).pdf

UE-13\_Duvall Exhibit No.\_\_(GND-2)(PACJan2013).pdf

UE-13\_Duvall Exhibit No.\_\_(GND-3)(PACJan2013).pdf

UE-13\_Duvall Exhibit No.\_\_(GND-4)(PACJan2013).xlsx

UE-13\_Duvall Exhibit No.\_\_(GND-4)(PACJan2013).pdf

UE-13\_Duvall Exhibit No.\_\_(GND-5)(PACJan2013).xlsx

UE-13\_Duvall Exhibit No.\_\_(GND-5)(PACJan2013).pdf

UE-13\_Duvall Exhibit No.\_\_(GND-6)(PACJan2013).xlsx

UE-13\_Duvall Exhibit No.\_\_(GND-6)(PACJan2013).pdf

G. UE-13\_Tallman (PACJan2013)

UE-13\_Tallman Testimony Exhibit No.\_\_(MRT-1T)(PACJan2013).docx

UE-13\_Tallman Testimony Exhibit No.\_\_(MRT-1T)(PACJan2013).pdf

H. UE-13\_Kelly (PACJan2013)

UE-13\_Kelly Testimony Exhibit No.\_\_(ALK-1T)(PACJan2013).docx

UE-13\_Kelly Testimony Exhibit No.\_\_(ALK-1T)(PACJan2013).pdf

UE-13\_Kelly Exhibit No.\_\_(ALK-2)(PACJan2013).pdf

UE-13\_Kelly Exhibit No.\_\_(ALK-3)(PACJan2013).docx

UE-13\_Kelly Exhibit No.\_\_(ALK-3)(PACJan2013).pdf

UE-13\_Kelly Exhibit No.\_\_(ALK-4)(PACJan2013).pdf

UE-13\_Kelly Redacted Exhibit No.\_\_(ALK-5)(PACJan2013).pdf

I. UE-13\_Ralston (PACJan2013)

UE-13\_Ralston Testimony Exhibit No.\_\_(DMR-1T)(PACJan2013).docx

UE-13\_Ralston Testimony Exhibit No.\_\_(DMR-1T)(PACJan2013).pdf

J. UE-13\_Wilson (PACJan2013)

UE-13\_Wilson Testimony Exhibit No.\_\_(EDW-1T)(PACJan2013).docx

UE-13\_Wilson Testimony Exhibit No.\_\_(EDW-1T)(PACJan2013).pdf

UE-13\_Wilson Exhibit No.\_\_(EDW-2)(PACJan2013).pdf

K. UE-13\_Stuver (PACJan2013)

UE-13\_Stuver Testimony Exhibit No.\_\_(DKS-1T)(PACJan2013).docx

UE-13\_Stuver Testimony Exhibit No.\_\_(DKS-1T)(PACJan2013).pdf

L. UE-13\_McDougal (PACJan2013)

UE-13\_McDougal Testimony Exhibit No.\_\_(SRM-1T)(PACJan2013).docx

UE-13\_McDougal Testimony Exhibit No.\_\_(SRM-1T)(PACJan2013).pdf

UE-13\_McDougal Exhibit No.\_\_(SRM-2)(PACJan2013).xlsx

UE-13\_McDougal Exhibit No.\_\_(SRM-2)(PACJan2013).pdf

UE-13\_McDougal Exhibit No.\_\_(SRM-3)(PACJan2013).pdf

UE-13\_McDougal Exhibit No.\_\_(SRM-5)(PACJan2013).docx

UE-13\_McDougal Exhibit No.\_\_(SRM-5)(PACJan2013).pdf

M. UE-13\_Coughlin (PACJan2013)

UE-13\_Coughlin Testimony Exhibit No.\_\_(BAC-1T)(PACJan2013).docx

UE-13\_Coughlin Testimony Exhibit No.\_\_(BAC-1T)(PACJan2013).pdf

N. UE-13\_Paice (PACJan2013)

UE-13\_Paice Testimony Exhibit No.\_\_\_\_(CCP-1T)(PACJan2013).docx  
UE-13\_Paice Testimony Exhibit No.\_\_\_\_(CCP-1T)(PACJan2013).pdf  
UE-13\_Paice Exhibit No.\_\_\_\_(CCP-2)(PACJan2013).xlsx  
UE-13\_Paice Exhibit No.\_\_\_\_(CCP-2)(PACJan2013).pdf  
UE-13\_Paice Exhibit No.\_\_\_\_(CCP-3)(PACJan2013).xlsx  
UE-13\_Paice Exhibit No.\_\_\_\_(CCP-3)(PACJan2013).pdf  
UE-13\_Paice Exhibit No.\_\_\_\_(CCP-4)(PACJan2013).xlsx  
UE-13\_Paice Exhibit No.\_\_\_\_(CCP-4)(PACJan2013).pdf  
UE-13\_Paice Exhibit No.\_\_\_\_(CCP-5)(PACJan2013).pdf

O. UE-13\_Steward (PACJan2013)

UE-13\_Steward Testimony Exhibit No.\_\_\_\_(JRS-1T)(PACJan2013).docx  
UE-13\_Steward Testimony Exhibit No.\_\_\_\_(JRS-1T)(PACJan2013).pdf  
UE-13\_Steward Exhibit Nos.\_\_\_\_(JRS-2)(PACJan2013).pdf  
UE-13\_Steward Exhibit Nos.\_\_\_\_(JRS-3-6)(PACJan2013).xlsx  
UE-13\_Steward Exhibit Nos.\_\_\_\_(JRS-3)(PACJan2013).pdf  
UE-13\_Steward Exhibit Nos.\_\_\_\_(JRS-4)(PACJan2013).pdf  
UE-13\_Steward Exhibit Nos.\_\_\_\_(JRS-5)(PACJan2013).pdf  
UE-13\_Steward Exhibit Nos.\_\_\_\_(JRS-6)(PACJan2013).pdf

### **CD.3 WA UE-13\_Confidential Testimony and Exhibits (PACJan2013)**

UE-13\_Duvall Confidential Testimony (PACJan2013)

UE-13\_Duvall Testimony Exhibit No.\_\_\_\_(GND-1CT)(PACJan2013).docx

UE-13\_Duvall Testimony Exhibit No.\_\_\_\_(GND-1CT)(PACJan2013).pdf

UE-13\_Kelly Confidential Exhibit (PACJan2013)

UE-13\_Kelly Confidential Exhibit No.\_\_\_\_(ALK-5C)(PACJan2013).pdf

UE-13\_Kelly Exhibit No.\_\_\_\_(ALK-5.1-3C)(PACJan2013).docx

UE-13\_Kelly Exhibit No.\_\_\_\_(ALK-5.4C)(PACJan2013).xlsm

UE-13\_Kelly Exhibit No.\_\_\_\_(ALK-5.5C)(PACJan2013).xlsx

UE-13\_Kelly Exhibit No.\_\_\_\_(ALK-5.6C)(PACJan2013).xlsx

UE-13\_McDougal Confidential Exhibit (PACJan2013)

UE-13\_McDougal Exhibit No.\_\_\_\_(SRM-4C)(PACJan2013).pdf

### **CD.4 WA UE-13\_Confidential Workpapers (PACJan2013)**

UE-13\_Workpaper Index (PACJan2013).pdf

UE-13\_Workpaper Index (PACJan2013).docx

UE-13\_PAC 2011 Affiliated Interest Report CONF(PACJan2013).pdf

A. Confidential Hadaway Workpapers

Highly\_Sensitive\_Hadaway\_Workpapers.pdf

B. Confidential Brown Workpapers

KAB model stats CONF.xlsx

KAB Workpapers Irr Correlation CONF.xlsx

C. Confidential Kelly Workpapers

Model\_FinalSettlement-FA2\_CONF.xlsm

Model\_RelicenseFERC-FA1\_CONF.xlsm

Relicensing & settlement process cost summary CONF.xlsx

D. Confidential Duvall Workpapers

Actual WCA NPCs

Actual Monthly WCA (2007) \_2012 12 18.xlsx

Actual Monthly WCA (2008) \_2012 12 18.xlsx

Actual Monthly WCA (2009) \_2012 12 18.xlsx

Actual Monthly WCA (2010) \_2012 12 18.xlsx

Actual Monthly WCA (2011) \_2012 12 18.xlsx

Testimony One-offs

Data Series

\_WA\_GRC\_CY14\_Total\_Company\_NPC\_Study\_2012\_12\_07\_TransmissionJan-Jun.zip

\_WA\_GRC\_CY14\_Total\_Company\_NPC\_Study\_2012\_12\_07\_TransmissionJul-Dec.zip

WA\_Demand (Conf) (ECA Sale).xlsx

WA\_Energy Charge (121108) (Conf) (ECA Sale).xlsx

WA\_EOR (Conf) (DynOverlay).xlsx

WA\_EOR (Conf) (P50 Wind).xlsx

WA\_Heat Rate Coefficients (Conf) (DynOverlay).xlsx

WA\_Hourly Hydro (Conf) (UE-111190 CY14).xlsx

WA\_Modified Hourly ECA CONF (ECA Sale).xlsx

WA\_OtherCost (121108) NOV12 (Conf) (DCIntertie).xlsx

WA\_OtherCost (121108) NOV12 (Conf) (DynOverlay).xlsx

WA\_Weekly Hydro (121108 OFPC) (Conf) (10yrMax).xlsx

WA\_Weekly Hydro (121108 OFPC) (Conf) (10yrMed).xlsx

WA\_Weekly Hydro (121108 OFPC) (Conf) (10yrMin).xlsx  
WA\_Weekly Hydro (121108 OFPC) (Conf) (xOATT).xlsx  
WA\_Weekly Hydro (121108 OFPC) (Conf) (xWindInt).xlsx  
WAw\_Bridger Ration (Conf) (DynOverlay).xlsx  
WAw\_Regulating Margin Base Amount (xOATT).xlsx  
WAw\_Transmission Topology (Conf) (DynOverlay).xlsx  
WAw\_Wheeling (Conf) (DCIntertie).xlsx  
WAw\_Wheeling (Conf) (DynOverlay).xlsx  
WAw\_Wind (Conf) (P50 Wind).xlsx  
WAw\_Wind (Conf) (xOATT).xlsx

#### NPC Reports

One-off\_WA GRC CY14 WCA 10 Year Max Hydro (Conf).xlsm  
One-off\_WA GRC CY14 WCA 10 Year Median Hydro (Conf).xlsm  
One-off\_WA GRC CY14 WCA 10 Year Min Hydro (Conf).xlsm  
One-off\_WA GRC CY14 WCA Dynamic Overlay Derate (Conf).xlsm  
One-off\_WA GRC CY14 WCA East Control Area Sale (Conf).xlsm  
One-off\_WA GRC CY14 WCA Load Regulation only No Wind Integration  
(Conf).xlsm  
One-off\_WA GRC CY14 WCA No OR CA QFs (Conf).xlsm  
One-off\_WA GRC CY14 WCA No WA Comm weather adj(Conf).xlsm  
One-off\_WA GRC CY14 WCA P50 Wind (Conf).xlsm  
One-off\_WA GRC CY14 WCA Remove DC Intertie (Conf).xlsm  
One-off\_WA GRC CY14 WCA Remove OATT Wind Integration (Conf).xlsm  
One-off\_WA GRC CY14 WCA UE-111190 Hourly Hydro (Conf).xlsm

#### Wind Market Value

UE061546 Wind Market Value.xlsx  
UE080220 Wind Market Value.xlsx  
UE090205 Wind Market Value.xlsx  
UE100749 Wind Market Value.xlsx

\_Figure 1 – SCA Actual vs. Forecast Wind CONF.xlsx

\_Table 2 – Wind Market Risk\_2007-2011 CONF.xlsm

GRID Project – WA \_GRC\_CY2014 WCA Testimony One-offs\_2012 12 21.zip

GRID User Guides (Conf).zip

UE-111190 WA GRC Stipulated NPC GOLD CONF\_2012 12 19.xlsm

WUTC101w\_Gas Swaps (Conf) (111108) (UE-111190).xlsx

#### D1. Duvall - Coal Costs CONF

2011 WA GRC

BCC – Nov 18, 2011

Analysis

Executive Summary

Bridger Coal Company Executive Summary 11-24-  
2008.doc

Bridger Coal Company Executive Summary 2008.doc

Housing Assist

Copy of Housing Asst Surface BUDGET.xls

Copy of Housing Asst Surface.xls

Copy of Housing Asst UG Hourly BUDGET.xls

Copy of Housing Asst UG Hourly.xls

Copy of Housing Asst UG Mgmt BUDGET.xls

Copy of Housing Asst UG Mgmt.xls

Labor

Bridger Coal Interwest Labor Jan-May Summary.xls  
CONFIDENTIAL Wage Data 2009-06-02.xls  
Copy of Labor Escalation – 11-24-08.xls  
Labor Escalation.xls  
Prod Loaned Borrowed Labor by CC 2009 Actual.xls  
SAP Labor Loading Estimate.xls  
Unscheduled overtime.xlsm  
Unscheduled overtime\_1.xlsm  
Unscheduled overtime\_.xlsm  
Unscheduled overtime\_PMI.xlsm

OpSupplies  
OpSupplies surf review jan to jun17 work.xls  
OpSupplies surf review jan to jun.xls  
OpSupplies UG review jan to jun.xls

Other  
OTHER SURF review jan to jun.xls  
OTHER UG review jan to jun.xls

Outside Services  
Outside Services Summary.xls  
Outside Services Summary\_.xls  
Outside Services SURFACE JAN-JUN.xls  
Outside Services UG JAN-JUN work.xls  
Outside Services UG JAN-JUN.xls  
Price Mine Service Budget.xls

Working Hrs  
09 Working Hrs Report.xls  
2008 Working Hours by Center.xls  
2008 Working Hrs Report.xls  
2009 Working H ours by Center.xls

2009-2018 LW Cycles.xls  
2009 – 2018 Escalation Assumptions – BCC – 11-24-2008.xls  
2009 – 2018 Escalation Assumptions – BCC.xls  
2010-2019 LW Cycles – August 13, 2009.xls  
2010-2019 LW Cycles.xls  
ADJUSTED (8-7-09) 2010 3 CMs 2011 45D Alt Calendar 06 23 09  
Pivot.xls  
Apartment List.xls  
BCC 2009-2018 Coal Consumption Estimate – July 10, 2008.xls  
BCC 2009 – Out-of-Pocket Surface Coal Costs.xls  
Bonus estimate.xlsm  
Bridger Coal billed Summary Jan-May.xls  
BRIDGER Fuel Consumed Estimate – July 10, 2008.xls  
Dust2006.xls  
Dust2007.xls  
Dust Supression 2009.xls  
Grade Structure Impact – Interwest Mining.xls  
Healthcare cost forecast.xls  
Healthcare cost forecast\_xls  
Oct. 15 Escalation Summary.xls  
PMS Employee List.xls  
SURF LUBE JAN TO JUN.xls  
Surface Mine Depreciation Summary – July 8, 2009.xls

UG LUBE JAN TO JUN.xls

OPEX-CAPEX

5<sup>th</sup> Right LW move project summary – 2010.xlsx  
11-01-2011 with update with excursion data.xlsx  
2011 – 2020 BCC Production-Operating Cost Schedules.xlsx  
2011 Mine Plan 5 MT 9-8-11.xlsx  
2011 TenYr Mine Plan Sumstat – Opt2A.xlsx  
2012 10 YR UG MNT BUDGET 300 FT V1Prelim (3).xlsx  
Agenda – September 19, 2011 Meeting.docx  
Attrition & Signon Bonus.xlsx  
BCC – Labor-Benefit Cost Analysis.xlsx  
BCC – UG Other Expenditures.xlsx  
BCC Assumptions.xls  
BCC Labor-Benefit Analysis.xlsx  
BCC Surface Mine – CC Detail .xlsx  
BCC Surface Mine – Fleet CC Detail.xlsx  
BCC UG Production Comparison.xlsx  
BCC Underground M&S Analysis.xlsx  
BCC Underground Operating Supplies.xlsx  
BCC Union Cost-Benefit Analysis – July 2010.xlsx  
Book2.xlsx  
Cost Quality2011mp-may11-10yr.xlsx  
Cost Quality2012mp-sep11-10yr.xlsx  
Cost Quality2013mp-jul11-10yr-budget opt 3 (2).xlsx  
Cost Quality2014mp-jul11-10yr-budget opt 3 (2).xlsx  
Cost Quality2015mp-jul11-10yr-budget opt 3 (2).xlsx  
Cost Quality-2012mp-nov11 plan-opt4.xlsx  
Cost Quality 2015mp-sep11-10yr-budget opt4-revision.xlsx  
Comparison – Cost by Account.xlsx  
Copy of Unscheduled Overtime 2011.xls  
CY11 Enhanced 401k Rates 20100513 (3).xlsx  
CY2011 SUMSTAT – Nov11 11-14-11.xlsx  
CY2011 SUMSTAT – Nov11 Rate Case (2).xlsx  
Drilling Yardage Explosive Forecast Opt 1B.xls  
Electricity Allocation and Tracking 2004A.xlsx  
Escalation Rates 11-01-11.xlsx  
Escalation Rates.xlsx  
EWEST – BCC allocation.xls  
Explosives Nov 2011 Forecast to Accounting11-02-11.xlsx  
Explosives Option 4 10-Yr Budget to Accounting9-12-11.xlsx  
Forecast Comparison.xlsx  
Fuel Price and Index Fcst Master9-8-11.xlsx  
Fuel Price and Index Fcst Master11-18-11.xlsx  
Healthcare\_Cost\_Analysis 5-27-11.xlsx  
Labor-Benefit Analysis.xlsx  
Longwall Cycles.xlsx  
Mid c prices\_20111114.xlsx  
Mid Columbia C – May 25, 2011.xlsx  
Outside Services – SURFACE.xlsx  
Outside Services – UG.xlsx  
Safety Recognition Payout 2007-2010.xlsx  
SURF REPAIRS BUDGET.xlsx



SURFACE\_LABORMODULE-2012.xlsx  
 UG Overhaul Budget.xlsx  
 UG Roof Support Pricing 7-26-11.xlsx  
 UNDERGROUND\_LABORMODULE-2012.xlsx  
 Unscheduled Overtime 2011.xlsx  
 WORKING FILE ROUND 2-2012 Depr Exp 10YP.xls  
 Agenda – June 8, 2011 Meeting.docx  
 BCC 2009 Labor-Benefit Detail.xls  
 BCC 2010 Labor-Benefit Detail.xls  
 BCC 2011 Recl Plan Main File (3).xls  
 BCC – Contract Labor – Outside Services.xlsx  
 BCC Benefit Billing Analysis – June 2010.xlsx  
 Business Plan Cover Pgs.docx  
 Deferred Longwall Setup.xls  
 Fixed Asset.xlsx  
 Fuel Price and Index Fcst Master (2).xlsx  
 Idaho Budget – 2010 Plan.xls  
 Outside Services SURFACE Apr 2010.xlsx  
 Outside Services SURFACE DEC 2008.xls  
 Production by lease for RT.xlsx  
 Summary Statistics – July 2, 2010.xlsx  
 All Inclusive Index Less Fuel Calculation.xlsx  
 BRIDGER.xlsx  
 COLSTRIP.xlsx  
 Contract Escalations.xlsx  
 Cost Comparison.xlsx  
 Diesel Fuel Hedge Requirements 2012.xlsx  
 Escalation Rates. xlsx  
 FLLTSUMM Export 12-1-11.xlsx  
 FLLTSUMM.xlsx  
 Fuel Price and Index Fcst Master.xlsx  
 WUTC101 – WAGRC WCA only – Thermal MMBTU\_2011 11 30.xlsx  
 2013 WA GRC  
 BCC – LOM September 28, 2012 Rev  
 Analysis  
 2013- 2022 Mininig Budget June 18, 2012.ppt  
 BCC – Labor-Benefit Cost Analysis.xlsx  
 BCC Labor-Benefit Analysis.xlsx  
 BCC Underground M&S Analysis.xlsx  
 BCC Union Cost-Benefit Analysis – July 2010.xlsx  
 CY11 Enhanced 401k Rates 20100513 (3).xlsx  
 Idaho – sinking fund calculation.xlsx  
 Labor-Benefit Analysis.xlsx  
 OPEX-CAPEX  
 2012-2022 OPTION 3 SUM I Surface Maint. Parts.xlsx  
 2012 10 YR UG MNT BUDGET 300 FT V1Prelim (3).xlsx  
 2012 surface budget manpower 9-28-12.xls  
 2013 10-Yr Budget Explosives.xlsx  
 2013 Approved Business Plan Sumstat.xlsx  
 2013 Depr Exp 10YP-UG LOM 2037.xls  
 2013 Depr Exp 10YP-Version 1 xls  
 Accrued Extraction Tax Balances 2010.xlsx

BCC 2012 10YP YOY Comparison – Sep 28, 2012 to September 23, 2011.xlsx  
BCC 2012 10YP YOY Comparison – September 28, 2012 to July 20, 2012.xlsx  
BCC 2012 10YP YOY Comparison – September 28, 2012 to July 23, 2012.xlsx  
BCC 2013 Budget Closure Monitor.xlsx  
BCC 2013 Budget Closure Plan Demo.xlsx  
BCC – UG Other Expenditures.xlsx  
BCC Assumptions.xls  
BCC Cost Center 1420 – UG (surface) Conveyors-Coal Handling.xlsx  
BCC Health Insurance Evaluation – Crane proposals 083110.xlsx  
BCC LOM Capital Summary – 8-31-2012 – incl Final Reclam – adjusted (9-25-12).xlsx  
BCC Production-Operating Cost Schedules.xlsx  
BCC Surface Mine – CC Detail .xlsx  
BCC Surface Mine – Fleet CC Detail.xlsx  
BCC Underground Operating Supplies.xlsx  
BLS Data.xlsx  
Capitalized Development Calculation \_REV1.xlsx  
Capitalized Development Calculation.xlsx  
Carlson Data UG 10 YR 8-2-2012.xlsx  
Carlson Data UG LOM 8-12 .xlsx  
Coal Quality Royalties ABP 8-28.xlsx  
Copy BCC LOM Capital Summary – 8-31-2012 – incl Final Reclam – adjusted (9-12-12).xlsx  
Escalation Rates 5-17-12.xlsx  
Fuel Price and Index Fcst Master 9-24-12.xlsx  
Healthcare\_Cost\_Analysis 5-27-11.xlsx  
Highwall Reduction Blasting Yards.xlsx  
Longwall Cycles.xlsx  
Mid Columbia C.xlsx  
Outside Services – SURFACE.xlsx  
Outside Services – UG.xlsx  
SURFACE\_LABORMODULE.xlsx  
UG – Overhaul Budget.xlsx  
UG OpSupp Comparison.xlsx  
UG OpSupplies By Acct Budget Changes – 2013.xlsx  
UG Roof Support Pricing 2-2012.xlsx  
UNDERGROUND\_LABORMODULE.xlsx

#### Reports

3 yr and 6 yr comparison (2013-2012).xlsx  
2010 Budget Index\_IERCO.docx  
2012 Year-End Delivered Variance Analysis – July 20, 2012 (2).xls  
2013-2015 Year-End Delivered Variance Analysis – December 8 2011.xls  
2013-2015 Year-End Delivered Variance Analysis – July 20, 2012 (2).xls  
2013-2015 Year-End Delivered Variance Analysis – June 18, 2012.xls

2013-2015 Year-End Delivered Variance Analysis – June 20 2012  
(Revised 7-13-12).xls  
2013-2022 Mininig Budget July20 2012 (with both labors).ppt  
2013-2022 Mininig Budget July20 2012.ppt  
2013-2022 Mininig Budget July 20 2012.ppt  
2013-2022 Mininig Budget June 18 2012.ppt  
2013 Year-End Delivered Variance Analysis – July 20, 2012 (2).xls  
2014 Year-End Delivered Variance Analysis – July 20, 2012 (2).xls  
2015 Year-End Delivered Variance Analysis – July 20, 2012 (2).xls  
2016-21 Year-End Delivered Variance Analysis – June 18,  
2012.xls  
BCC 2010 10YP YOY Comparison November 17, 2009 vs.  
October 30, 2009.xlsm  
BCC 2013-15 Year over Year PRODUCED Variance Analysis.xls  
BCC 2016-21 Year over Year PRODUCED Variance Analysis.xls  
Binder Pg.docx  
Business Plans Cover Pgs.docx  
Comparison 213-15.xlsx  
Cover Pg.docx  
Final Rec Comparison.xlsx  
July 2, 2010 Bus Plan.pdf  
Nov 17, 2009 Bus Plan – Final.pdf  
Other Items November 17, 2009.docx  
Overview.xlsx  
Production Rate Comparison November 17, 2009.xlsx  
See Other Sheets.docx  
Surface Challenges and Opportunities November 17, 2009.docx  
Surface mine plan on plan November 17, 2009.docx  
UG Challenges and Opportunities November 17, 2009.docx  
Variance comparison \$ ton.xlsx  
Surface Maintenance Fleet Costs  
2012-2022-approved 2013  
BLADES  
16M MASTER.xls  
705 BLADE 2012.xls  
707 BLADE 2012.xls  
708 BLADE 2012.xlsx  
709-2012.xls  
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711-2012.xls  
712-2012.xls  
713-2012.xls  
DOZERS  
528- 2012.xls  
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531-2012.xls  
532-2012.xls  
533-2012.xls  
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551-2012.xls  
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553-2012.xls  
554-2012.xls  
555-2012.xls  
556-2012.xls  
723-2012.xls  
724-2012.xls  
725-2012.xls  
D10 2012 MASTER.xls  
D11 2012 MASTER.xls  
RTD-MASTER.xls

#### DRAGLINE

102-2011.xls  
103-2011.xls  
2011 DRAGLINE MASTER.xls

#### DRILLS

306-2012.xls  
307-2012.xls  
308-2012.xls  
309-2012.xls  
310-2012.xls  
349-2012.xls  
351-2012.xls  
361-2012.xls  
362-2012.xls  
363-2012.xls  
2012 DML MASTER.xls  
2012 DMM3 MASTER.xls  
COAL DRILL MASTER.xls

#### HAUL TRUCKS

412-2012.xls  
440-2012.xls  
441-2012.xls  
442-2012.xls  
443-2012.xls  
444-445-446-2012.xls  
444-2012.xls  
445-446-447-2012.xls  
445-2012.xls  
446-2012.xls  
447-2012.xls  
448-449-2012.xls  
448-2012.xls  
449-2012.xls

450-451-452-2012.xls  
450-2012.xls  
451-2012.xls  
452-453-2012.xls  
453-2012.xls  
454-2012.xls  
455-2012.xls  
456-2012.xls  
457-2012.xls  
458-489-2012.xls  
785-2012 MASTER.xls  
785 master-2012.xls

#### LOADERS

222-2012.xls  
223-2012.xls  
243-2012.xls  
245-2012.xls  
246-2012.xls  
247-NEW-2012.xls  
247-NEW-2016.xls  
248-NEW-2012.xls  
248-NEW-2029.xls  
248-NEW-2036.xls  
249-NEW-2029.xls  
250-NEW-2029.xls  
2051-NEW-2029.xls  
L1100 MASTER.xls  
L1400 MASTER.xls

#### LOW BOY

789 master.xls  
792-2012.xls  
795-2012.xls  
796-2012.xls  
797-2012.xls  
798-2012.xls  
LOW BOY MASTER.xls

#### PRICING

777 and 789 Trucks.xls  
Bridger Coal 16H Engine Estimate.xls  
Bridger Coal 16M Engine Estimate.xls  
Bridger Coal C-32 Drill Engine Estimate.xls  
Bridger Component Pricing.xls  
D11r and D10T cylinders.xls  
FLEET3~1.xls

#### SCRAPERS

624-2012.xls  
625-2012.xls  
626-627-2012.xls  
626-2012.xls  
627-2012.xls  
628-629-2012.xls  
628-2012.xls

629-2012.xls  
630-2012.xls  
657e 2012 MASTER.xls

WATER EQUIPMENT

631 MASTER.xls  
740-2012.xls  
741-2012.xls  
744-2012.xls  
745-2012.xls  
746-2012.xls  
747-2012.xls  
748-2012.xls  
749-2012.xls  
750-2012.xls  
751-2012.xls  
777 MASTER.xls

2012-2022 approved 2013.xlsx

2012 MASTER.xls

BE DRAGLINE COSTS.xls

Equipment running hours.xlsx

Updated Outages PMs.xlsx

BLADES

16M MASTER.xls

705 BLADE 2012.xls  
707 BLADE 2012.xls  
708 BLADE 2012.xls  
709-2012.xls  
710-2012.xls  
711-2012.xls  
712-2012.xls  
713-2012.xls

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530-2012.xls  
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447-2012.xls  
448-2012.xls  
449-2012.xls  
450-451-452-2012.xls  
450-2012.xls  
451-2012.xls  
452-453-2012.xls  
453-2012.xls  
454-2012.xls  
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457-2012.xls  
458-459-2012.xls  
785-2012 MASTER.xls  
785 master-2012.xls

## LOADERS

222-2012.xls  
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246-2012.xls  
247-NEW-2012.xls  
247-NEW-2016.xls  
248-NEW-2012.xls  
248-NEW-2036.xls  
249-NEW-2012.xls  
250-NEW-2012.xls  
2051-NEW-2012.xls  
L1100 MASTER.xls  
L1400 MASTER.xls

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798-2012.xls  
LOW BOY MASTER.xls

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Bridger Coal 16M Engine Estimate.xls  
Bridger Coal C-32 Drill Engine Estimate.xls  
Bridger Component Pricing.xls  
D11r and D10T cylinders.xls  
Fleet 3555 last three years for Randy Foster 03-14-11.xls

## SCRAPERS

624-2012.xls  
625-2012.xls  
626-627-2012.xls  
626-2012.xls  
627-2012.xls  
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## WATER EQUIPMENT

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747-2012.xls  
748-2012.xls  
749-2012.xls



750-2012.xls  
751-2012.xls  
777 MASTER.xls  
2B .xlsx  
2012-2022 OPTION 3 SUM.xlsx  
2012 MASTER.xls  
BE DRAGLINE COSTS.xls  
Equipment running hours.xlsx  
6<sup>th</sup> Right LW move Project 1004 043011.xlsx  
BCC 2009 Labor-Benefit Detail.xls  
BCC 2010 CM Labor Costs.xlsx  
BCC 2011 Recl Plan Main File (3).xls  
BCC – Contract Labor – Outside Services.xlsx  
BCC Benefit Billing Analysis – June 2010.xlsx  
BCC Feb. 19, 2010 Discussion Points.xlsx  
Business Plans Cover Pgs.docx  
Deferred Longwall Setup.xls  
Fuel Price and Index Fcst Master (2).xlsx  
Idaho Budget – 2010 Plan.xls  
Income-Cash Flow Statements.xls  
Outside Services SURFACE Apr 2010.xlsx  
Outside Services SURFACE DEC 2008.xls  
PMI\_BCC\_UG – Sept 2003 Final.xlsx  
Production by lease for RT.xlsx  
Rock Springs Rack Diesel Fuel Projection 3-24-11.xlsx  
Sept 7. vs. July 12 Summary Comparison.xlsx  
Summary Statistics – July 2, 2010.xlsx  
UG M&S Analysis – 201602021.xlsx  
All Inclusive Index.xlsx  
BRIDGER.xlsx  
COL 2013 Final AOP 34MOC2013\_Bg\_2012 09\_V05.xlsx  
COLSTRIP.xlsx  
Contract Escalations.xlsx  
Cost Comparison.xlsx  
FLLTSUMM Wa 2014 Export 11-29-12.xlsx  
FLLTSUMM.xlsx  
Fuel Price and Index Fcst Master.xlsx  
WA GRC CY2014 WCA Thermal MMBTU\_2012 11 21.xlsx