

STOEL RIVES LLP

A T T O R N E Y S

ONE UNION SQUARE
600 UNIVERSITY STREET, SUITE 3600
SEATTLE, WASHINGTON 98101-3197
Phone (206) 624-0900 Fax (206) 386-7500
TDD (206) 628-6202
Internet: www.stoel.com

June 23, 2000

RECEIVED
RECORDS MANAGEMENT
00 JUN 28 AM 8:33
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

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

**Re: PacifiCorp d/b/a Pacific Power & Light Company
Docket No. UE-991832**

Dear Ms. Washburn:

In accordance with WAC 480-09-736(11), PacifiCorp disputes several items accepted subject to check during the hearings before the Commission on June 5-7. These items, and PacifiCorp's reasons for disputing the statements, are as follows:

- The Company cannot accept the statement on page 518, line 20 through page 519, line 6 that "71% of the union labor increases for 2001 are not known yet." According to the Company's calculations, the current ratio of Local 57 employees on Exhibit 106 is 51%.
- The Company cannot accept the statement at page 605, lines 18-19 that "no part of your Adjustment 4.1 affects fuel expense." When fuel is burned from the stockpile (account 151), it is charged to fuel expense 501.
- The Company cannot accept the statement at page 673, line 21 through page 674, line 2 that Y2K costs in the Utah order were amortized over 5 years, as a 3-year amortization was approved in that case. (See page 674, lines 9-14)
- The Company cannot accept the statement at page 718, lines 9-13 that "in the last rate case . . . the uncollectables were at \$996,000, and that reflected roughly 0.6 percent of system revenue here in Washington." In the Company's last rate case, Cause No. U-86-02, actual uncollectables were \$796,000, which was adjusted by Staff using a 12 month average rate of .47%, resulting in a disallowance of \$172,000.
- The Company cannot accept the statement at page 720, lines 12-16 that "in past rate dockets, the allowance for uncollectables . . . has generally been around .25 percent." With the use of indefinite terms such as "generally been around," the statement is incapable of being verified. Moreover, such a question is not directed at requiring the witness "to perform calculations or extract detailed data while the witness is on the stand" (WAC 480-09-736(11)), and thus is beyond the scope of information which may be presented to the witness.
- The Company cannot accept the statement at page 720, lines 17-19 that "there isn't a Commission order with a provision for uncollectables greater than one percent." Such a question is not directed at requiring the witness "to perform calculations or extract detailed data while the witness is on the stand (WAC 480-09-736(11))" and thus is beyond the scope of information which may be presented to the witness. To the extent the requesting party has

STOEL RIVES LLP

Carole J. Washburn
June 23, 2000
Page 2

performed the research supporting such a question, it may be presented as legal argument in brief.

- The Company cannot accept the statement at page 723, lines 3-6 that with respect to invoices for corporate aircraft use, the month of “June is as representative as any month might be for the test year.” As indicated in the table below, June is not representative in many aspects from the monthly average over the test year, particularly in the category of “spouse travel.”

	June	Average
Empty	4,957	17,256
Demo	72,734	68,005
Non Reg	56,328	112,843
Other	3,906	19,342
Elec Reg	243,450	227,028
Corp Reg	73,207	33,461
Empty Reg	46,134	43,301
Spouse	13,162	3,122
TOTAL	513,879	524,358

- The Company does not accept the statement at page 738, line 7 that “1.176 billion is reflective of the Australian utility operations.” The equity invested in Australia was provided in Public Counsel Attachment Response 81, which indicates the equity invested in Australia Electric Consolidated at 12/31/99 was \$683,924,000.
- The Company does not accept the statement at page 738, line 19 through page 739, line 7 that “if we removed that 1.176 billion of non-utility equity investment from this balance that the domestic electric capital structure would fall well below 20 percent for equity.” As noted above, the \$1.176 billion figure is not correct. The calculation does not represent the capital invested in domestic utility operations and does not result in a domestic electric equity ratio of less than 20%.
- The Company does not accept the statement at page 757, lines 14-16 that “Idaho and Wyoming have interruptible customers,” as Wyoming does not have interruptible customers.

Thank you for your assistance.

Very truly yours,

Stoel Rives LLP

By 

James M. Van Nostrand
Counsel for PacifiCorp

cc: Service List
Administrative Law Judge Dennis J. Moss

JMV:jmv