

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 23, 2004	WITNESS:	Alan P. Buckley
CASE NO.:	UE-032065	RESPONDER:	Alan P. Buckley
REQUESTER:	PacifiCorp	TELEPHONE:	(360) 664-1306

**REQUEST NO. 3.3:** Please indicate whether Mr. Buckley's calculations of Net Power Costs reflect the increased kwh sales resulting from Dr. Mariam's temperature normalization adjustment. If so, please indicate where this is discussed in Mr. Buckley's testimony and exhibits. If not, please indicate why not.

**RESPONSE:**

No. Mr. Buckley made no changes to the loads utilized by the GRID model in determining Net Power Costs. To properly reflect the net effect of Dr. Mariam's recommended adjustment on the Net Power Cost for Washington, the loads of all jurisdictions, utilizing the recommended methodology, would have to be re-calculated and incorporated into both the GRID model and the Company's inter-jurisdictional allocation models. Without completed re-cast model runs, incorporating the net effect of all load changes, Mr. Buckley made no presumption that the overall system load, or the load assigned to the Western Control Area for purposes of allocating both resource costs and benefits would change.

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RESPONSE TO DATA REQUEST

DATE PREPARED:	July 23, 2004	WITNESS:	Yohannes K. Mariam
CASE NO.:	UE-032065	RESPONDER:	Yohannes K. Mariam
REQUESTER:	PacifiCorp	TELEPHONE:	(360) 664-1316

**REQUEST NO. 3.8:** According to Exhibit \_\_\_ (YKGM-2), page 10, Staff's adjustment represents an increase of 50,001,371 kWh over the temperature adjustment proposed by the Company.

- a. Please indicate whether this increase had any effect on (i) Mr. Buckley's calculation of Net Power Costs, or (ii) the allocation factors used in Mr. Buckley's analysis.
- b. If so, please indicate where this adjustment is carried forward in Mr. Buckley's calculation and analysis.
- c. If not, please explain why the increase in load represented by Dr. Mariam's adjustment does not affect Mr. Buckley's calculation of Net Power Costs or allocation analysis.

**RESPONSE:**

Staff did not make a determination regarding the impact of its temperature adjustment on Mr. Buckley's net power costs or allocation factors. Any such determination would be beyond the scope of Dr. Mariam's testimony.