

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED:	August 16, 2004	WITNESS:	Thomas E. Schooley
CASE NO.:	UE-032065	RESPONDER:	Thomas E. Schooley
REQUESTER:	Bench	TELEPHONE:	(360) 664-1307

REQUEST NO. 1:

COMMISSION STAFF: Please provide versions of prefiled Exhibit Nos. TES-2 and TES-3 that show what Staff's adjustments would be if made on the basis of PacifiCorp's proposed interjurisdictional allocation methodology.

RESPONSE:

A complete conversion of Staff's power supply adjustments to the Company's Protocol allocation method cannot be made without significant additional effort. The Protocol is based on an allocation of "system" costs, including both Western and Eastern Control Area costs. Staff's recommended adjustments were only determined on a Western Control Area basis, as the effects on the Eastern Control Area or "System" were not identified or calculated. For example, Staff's water year adjustment only identified the effects on Western Control Area sales, purchases, and resources. To fully convert the adjustment to the Protocol method would require determining the effect on the entire system, including the Eastern Control Area. Another example is Staff's "Market Cap" adjustment. Unlike ICNU, Staff only determined the effect on Western Control Area resources of increasing the market cap for the Mid-Columbia market. Staff did not evaluate Eastern Control Area market caps or their effects on Eastern Control Area thermal units, sales, or purchases.

Also, a complete conversion of the adjustments related to the two hedges would have to include consideration of any Eastern Control Area hedges, which Staff did not evaluate. Under the Protocol, Washington would be allocated a share of those Eastern Control Area-related hedges as well. In addition, a complete conversion of the adjustments related to the Company corrected NPC study would also have to include consideration of those items identified as Eastern Control Area-related and not evaluated by Staff. Only the Emergency Purchase and Transmission related adjustments can be converted in a straightforward manner. The Emergency Purchase adjustment amount would be allocated on a system basis under the Protocol rather than on a Control Area basis. The

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Transmission adjustment would simply be replaced by the overall effect of moving back to the system allocation of transmission costs under the Protocol, as compared to the Control Area based allocation method under Staff's transitional model.

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REQUEST NO. 2:

COMMISSION STAFF: Please identify each adjustment proposed by each Staff witness to one or more of the line-item adjustment numbers included in Mr. Schooley's prefiled Exhibit Nos. TES-2 and TES-3.

RESPONSE:

Staff presents the attached two tables in response to Bench Request No. 2. Table 1 shows each witness and the adjustments s/he presents. Table 2 shows each adjustment and the person who addresses that issue.