APPENDIX D

Net Power Costs Workpapers and Supporting Documents Agreement Between PacifiCorp and ICNU

Net Power Costs Workpapers and Supporting Documents Agreement Between PacifiCorp and ICNU

Net Power Costs study workpapers are defined as those documents which show the source, calculations and details supporting the testimony and other exhibits including the documents used to develop the final inputs to GRID and the final modeling in GRID on the west control area basis. The data relied upon to support the cost details in the filing may include contracts, emails, white papers, studies, PacifiCorp computer programs, Excel spreadsheets, Word documents or pdf and text files.

In cases where systems change or are replaced in the future, PacifiCorp will continue to provide substantially the same information as provided in data request responses in PacifiCorp's 2009 General Rate Case as long as these filing requirements remain operative.

PacifiCorp and ICNU agree to continue the current practice of providing all discovery response answers, workpapers, including any other documents produced pursuant to this agreement via email (for non-confidential documents) and overnight mail (for confidential documents). All attachments provided through discovery that involves calculations will be provided electronically and in the case of Excel spreadsheets with all cells and formulas intact.

If there are any special circumstances where the Company has not provided documents or information within the workpapers listed below because it believes special handling procedures are necessary for that information, the Company will either:

- a. Redact the information from the document indicating where such information has been redacted.
- b. Identify the document(s) not provided, and provide the name of the appropriate person for ICNU to contact regarding access to the document(s).

A. Initial Filing by the Company

PacifiCorp will provide ICNU with workpapers and supporting documents as described below.

- 1. Concurrent with the Initial Study:
 - a) Workpapers that show the source and calculations pertaining to the Company Net Power Cost Study(s). The workpapers will include, at a minimum, copies of the net power cost report in Excel and the net power cost model database. Access to the power cost model will also be provided.
 - b) Identification of the "Time Period" used to determine outage rates and other input items in the net power cost model.

- c) A list and explanation of all modeling or logic changes or enhancements to the net power cost model that have been implemented since the last Washington case in which the Company proposed to change net power costs. This will include a statement of the direction and amount of change in net power costs resulting from each such change and documentation describing each change as well as net power cost model runs and workpapers quantifying the impacts of these changes.
- 2. Within five business days, after the Initial Filing, the Company will deliver to ICNU the following:
 - a) Workpapers showing the computation of the outage rates (planned and unplanned) used in the power cost model. Include all backup data showing each outage (planned or unplanned, etc.) and duration (planned or unplanned) considered in the time period, including NERC cause code, type of event, duration, energy lost, etc. Reference: ICNU 1.6¹
 - b) The heat rate curves for each resource and the spreadsheets showing the derivation of the heat rate curves. Reference: ICNU 1.26
 - c) Workpapers and documentation supporting the inputs contained in the "Other Cost" file used in the power cost model, including all electronic spreadsheets used to compute any of the line items in the file. This includes test year wheeling expenses modeled in GRID. Reference: ICNU 1.36
 - d) Workpapers and documentation supporting the "Energy Cost" file used in the power cost model, including all electronic spreadsheets used to compute any of the line items in the file. Reference: ICNU 1.57
 - e) Workpapers and documentation supporting the "Demand" file used in the power cost model, including all electronic spreadsheets used to compute any of the line items in the file. Reference: ICNU 1.58
- 3. As soon as practical, but no later than 15 days after the Initial Study has been provided, the Company will deliver to ICNU:
 - a) All documents, workpapers or other information relied upon by the Company in determining the market caps used in the power cost model for the forecast test period. Reference: ICNU 1.2
 - b) The current topology maps in the power cost model along with an explanation for all the differences that have been made to the topology since the last Washington case in which the Company proposed to change

Unless otherwise noted, all References are from discovery in UE-090205.

net power costs and an explanation of why the changes were made. Include supporting documentation, such as contracts resulting in changes to the transfer capabilities used in GRID. Reference: ICNU 1.3

- c) The date and a copy of the forward price curve, showing monthly heavy load hour and light load hour forward prices, used in creating the test year power cost model studies. Reference: ICNU 1.8
- d) Documents showing all short-term firm transactions (including short-term firm indexed transactions and swaps) modeled in the test year power cost study. In addition, each contract will have a designation as to its purpose (i.e., trading, arbitrage or balancing.) Reference: ICNU 1.10
- e) For all power, fuel and transmission related contracts modeled in GRID that were not included in the last Washington case in which the Company proposed to change net power costs:
 - 1. A copy of the contract (in pdf or electronic format, if available). Reference: ICNU.1.11
 - 2. Any workpapers or other documents used to develop the power cost model input assumptions related to the contract. id
- f) Regulatory Fuel Budget and any other workpapers used in developing the power cost model fuel cost inputs. Reference: ICNU 1.59
- g) Workpapers and documentation supporting the "Demand Cost" file used in the power cost model, including all electronic spreadsheets used to compute any of the line items in the file. Reference: ICNU 1.60
- h) Identification of each instance in which the Company changed any maximum capacities, minimum up or down times or unit minimum capacities for thermal or hydro generators modeled in the power cost model since the last Washington case in which the Company proposed to change net power costs. Reference: ICNU 1.61
- i) Workpapers explaining the development of each line of load adjustments presented on the Company's power cost model output reports. Reference: ICNU 1.62
- j) Workpapers for any screens applied to prevent uneconomic commitment and dispatch of resources in the GRID model. Reference: ICNU 1.64
- k) Workpapers and all supporting documents underlying the start-up fuel costs included in GRID in the line labeled Other Fixed Costs, or the equivalent.

B. Rebuttal Filing (and sur-surrebuttal Filing, if applicable) by Company

The Company will provide workpapers and supporting documents to ICNU as described below:

- 1. Concurrent with Company rebuttal or sur-surrebuttal filings:
 - a) Workpapers that show the source, calculations and details supporting the testimony and other exhibits. The workpapers will include the net power cost report on an adjustment-by-adjustment basis. The workpapers will include, at a minimum, electronic copies of the net power cost report and the net power cost model.
 - b) For any update, adjustment or correction to the power cost model, the Company will include a description of the change and a calculation of the adjustment amount.
- 2. As soon as practical, but no later than five business days after filing rebuttal or sur-surrebuttal:
 - a) To the extent that any of the items in Section A change, new versions of the supporting documentation and workpapers will be provided.
 - b) Access to the updated runs in power cost model via the designated internet access or power cost model input files containing all inputs and output reports associated with the update filings.

C. Filings by ICNU

Testimony filed by ICNU in response to the Company's net power costs calculations will provide workpapers and supporting documents as described below:

- 1. Concurrent with the filing of ICNU testimony:
 - a) Workpapers that show the source, calculations and details supporting the testimony and other exhibits. The workpapers will show on an adjustment-by-adjustment basis, the power cost model input file or files used, the back-up to the input files, and the power cost model study reports or documents showing the impact of the adjustment on NPC as compared to the comparison scenario. The associated power cost model input files will also be provided.