

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-210402

PACIFICORP

CROSS-EXAMINATION EXHIBIT FOR BRADLEY G. MULLINS

Public Utility Commission of Oregon Order No. 09-274

January 7, 2022

ORDER NO. 09-274

ENTERED 07/16/09

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 199

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER) ORDER
)
2009 Transition Adjustment Mechanism)
Schedule 200, Cost-Based Supply Service.)

DISPOSITION: STIPULATION ADOPTED

I. INTRODUCTION

On November 12, 2008, in Order No. 08-543, the Public Utility Commission of Oregon (Commission) adopted an all-party stipulation in this docket, resolving all issues related to setting rates (Rate Stipulation). Pursuant to paragraph 17 of the Rate Stipulation, PacifiCorp, dba Pacific Power (Pacific Power or the Company) agreed to convene a series of workshops to seek consensus on specific elements of future Transition Adjustment Mechanism (TAM) procedures. Among the issues were the cost elements to be included in the initial filing and each update, requirements for the content and timing of workpapers, and the mechanism for accounting for increased/decreased revenues due to load growth/loss. The workshops were to be convened on a schedule that would result in resolution of the issues by June 1, 2009, or in time for Pacific Power to implement in its first 2010 TAM update.

Pacific Power further agreed that, if the parties could not reach consensus on the elements of TAM updates, revenue growth, and filing requirements in the workshops, the Company would initiate a Commission proceeding. Pacific Power agreed to initiate this proceeding by January 15, 2009.

The parties convened a series of workshops and meetings, agreeing to extend the filing date for Pacific Power to initiate a Commission proceeding to February 5, 2009. After the Company filed its Compliance Filing for Initiation of Commission Proceeding to Resolve TAM Design Issues, the Commission held a prehearing conference on April 27, 2009 – at which the parties agreed to convene a settlement conference.

As a result of the settlement conference and follow-up negotiations, the parties reached agreement on guidelines governing future TAM proceedings. The parties filed a

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stipulation with the Commission on June 1, 2009 (TAM Stipulation)¹ The parties to the TAM Stipulation are Pacific Power, Commission Staff (Staff), the Citizens' Utility Board of Oregon (CUB), the Industrial Customers of Northwest Utilities (ICNU), and Sempra Energy Solutions LLC (Sempra). The parties filed a joint explanatory brief in support of the stipulation on June 19, 2009.

II. BACKGROUND

Pacific Power's TAM is an annual filing, updating the Company's forecast net power costs to account for changes in market conditions, with the final forecast update close to the direct access window to capture costs associated with direct access and to identify the proper amount for the transition adjustment. When filed on a stand-alone basis, the TAM is intended to be more narrow and streamlined than when the TAM is filed in or processed concurrently with a general rate case.

III. THE STIPULATION

A. In General

In their stipulation the parties agree that parties to a TAM proceeding should have a full opportunity to review, challenge, and litigate issues raised in the case. Parties may address the issue of whether, in a particular TAM proceeding, there should be three rounds of testimony or five rounds.

The TAM Stipulation provides that parties have not resolved, and may address in docket UE 210 (Pacific Power's general rate case pending before the Commission)², issues including, but not limited to: (1) whether changes in methodologies used in calculating net power costs, such as those used to calculate normalized hydro or forced or planned outage rates or calculation issues resolved by the Commission, will be permitted in stand-alone TAM proceedings; and (2) whether a stand-alone TAM should include the variable costs of new generation resources if the Company will not recover the fixed costs of the generation resource in the TAM rate effective period.

The TAM Stipulation further provides that issues related to the prudence of contracts, the appropriate modeling of contracts, and known and measurable changes to inputs for existing methodologies are within the proper scope of a stand-alone TAM proceeding. Any party (including Pacific Power) may advocate, in a future general rate case or other proceeding, other than a stand-alone TAM proceeding, that the TAM should be revised or eliminated.

¹ The TAM Stipulation (including the guidelines) is attached as Appendix A. We note a typo on page 5 of the guidelines attached to the stipulation. In the first paragraph of 4, the second to the last line, the word "proscribed" should be "prescribed."

² See also Notice Regarding TAM Stipulation, docket UE 210 (Jun 4, 2009).

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B. Initial Filing

In any future TAM filings (after docket UE 207, Pacific Power's 2010 TAM proceeding) the Initial Filing will be consistent with the following provisions:

1. At least 30 days prior to its initial filing, the Company will provide a pre-filing review to Staff, CUB, and ICNU of any proposed changes to the net power cost model (e.g., new model of GRID). For this pre-filing review, the Company will provide a side-by-side comparison, where practical, of the prior year net power costs with and without the model changes. In a stand-alone TAM filing, the Company agrees not to include model changes in its forthcoming filing, if Staff, CUB, or ICNU objects.
2. The Initial Filing will include updates to all of the net power cost components identified in Attachment A to the Stipulation (specified FERC accounts for net power costs). These costs will be based on the Company's most recent official forward price curve, forecast load and allocation factors. In a stand-alone TAM filing the Company also will update the steam revenues associated with Little Mountain steam sales. When a TAM is filed in, or processed concurrently with, a general rate case, this element may be included in the TAM or in the general rate case.
3. In its Initial Filing, the Company will identify and provide adequate support for all known contracts expected to be updated or added in the Rebuttal and Final Updates. The Company may update or add a contract not identified in the Initial Filing if it follows notice procedures and: (1) the new contract or contract update is based on new information, or (2) the omission resulted from a mistake.
4. In docket UE 207 and in future TAM proceedings, the Company has a continuing obligation to provide notice of any correction or omission promptly after discovering the error. The Company will file a summary of all identified corrections or omissions in its Initial Filing 15 business days before Staff and intervenor direct testimony is due.
5. The Company will provide access to the net power cost model to parties when it makes its Initial Filing, provided that the party has entered into a confidentiality agreement.
6. The Company will provide workpapers and other supporting documents as specified in Attachment B to the Stipulation (TAM Workpapers and Supporting Documents).
7. The parties agree to ask the Commission to make the protective order for the next TAM an "ongoing protective order" that will continue in effect in future TAM proceedings.

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C. Rebuttal Update Filing

At the time Pacific Power makes its rebuttal filing, it will include an update to forecast net power costs consistent with the following provisions:

1. The Company will update the following net power cost components, subject to the TAM guidelines:
 - a. Most recent official forward price curve.
 - b. New power, fuel and transportation contracts, both physical and financial, and updates to existing contracts.
2. The Company may make corrections to, or address omissions in, the components included in the Company's Initial Filing.
3. Parties reserve procedural rights related to the correction of the Rebuttal Update filing.
4. The Company will provide workpapers and other supporting documents as specified in Attachment B to the Stipulation.

D. Final Updates

Pacific Power will file final updates to net power costs and calculate transition adjustments as follows:

1. At least five business days prior to the direct access window, the Company will:
 - a. File an update to net power costs, incorporating the following:
 - i. Commission ordered adjustments;
 - ii. Forward Price Curve from within nine days of the filing date; and
 - iii. New contracts, or updates to existing contracts.
 - b. Post indicative transition adjustments for Schedules 294 and 295
 - c. Provide indicative supply service net power cost rates
2. On November 15, in accordance with OAR 860-038-0275(1), the Company will:
 - a. File an update to net power costs incorporating the forward price curve from within seven days of the filing date.
 - b. Post final transition adjustments for Schedules 294 and 295.

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- c. Provide supply service net power cost rates.
3. The Company will provide workpapers and other supporting documents for both the indicative and final filings.
4. The parties agree to meet and review whether to recommend to the Commission an extension in length for the shopping window for Pacific Power's multi-year direct access option, beginning in November, 2009.

E. Rate Design

1. In Pacific Power's current general rate case (docket UE 210), proposed net power costs are unbundled from other generation costs. All net power costs will be collected through a new Schedule 201, which will be applied as a rider to Schedule 200. Schedule 200 will continue to collect other generation costs.
2. In any future TAM filed in or processed concurrently with a general rate case after docket UE 207 (the Company's 2010 TAM filing), the TAM rate design test year will be the general rate case rate design test year. In a stand-alone TAM filing, the TAM rate design test year will be the forecast test year during which the Schedule 201 rates will be in effect.
3. If Pacific Power has not filed a general rate case within four years of the filing of UE 210, and does not plan to file a rate case by March 1, 2014, the Company will convene technical workshops no later than July 1, 2013, to provide the parties with relevant information to be able to make a preliminary determination if the then-current rate spread for its TAM rates may be unfair, unjust or unreasonable.
4. In any future TAM filed or processed concurrently with a general rate case, proposed Schedule 201 revenues by rate schedule will be determined by spreading the total forecast net power costs for the test year to the rate schedules in the same manner as the revenues for Schedule 200 are spread to the rate schedules: based on the functionalized revenue requirement as determined by the Commission based on a Cost of Service study, or by the method prescribed by the Commission in the most recent general rate case or Commission proceeding regarding rate spread and rate design.
5. In any future stand-alone TAM, proposed Schedule 201 revenues by rate schedule will be determined by spreading the total forecast net power costs for the test year to the rate schedules based on each schedule's proportion of "Present Schedule 201 revenues." Proposed Schedule 201 rate design shall reflect the method prescribed by the Commission in the most recent general rate case or other Commission proceeding regarding rate spread and rate design.

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F. TAM Filings Made in or Processed Concurrently with a General Rate Case

In all future TAM filings in a year in which Pacific Power files a general rate case, the TAM will be included in or processed concurrently with the general rate case filing. The Company agrees that both filings will be made no later than March 1, to allow for a January 1 rate effective date. In order to accommodate the direct access window that begins November 15, the TAM may be bifurcated from the full rate case to allow for a Commission decision by November 1.

When a TAM is filed in or processed concurrently with a general rate case, the Company or any party may propose changes to how the Company's Rate Mitigation Adjustment or other rate spread tools should operate in a stand alone TAM filing, made before the TAM is again filed in or processed with a general rate case.

If the TAM is filed on a stand-alone basis, it will be filed no later than April 1.

IV. SUPPORT FOR THE STIPULATION

In their brief in support of the TAM Stipulation the parties state that the purpose of the proposed guidelines is to decrease future controversy over the scope of the Company's TAM update filings, the procedures applicable to those filings, and the documents and support the Company will provide with the TAM and TAM updates.

Parties have raised issues related to scope and procedure in recent TAM filings, suggesting the need for guidelines on these issues to supplement and clarify the Commission's order adopting the TAM in docket UE 170 (Order No. 05-1050). The parties have found these issues especially challenging when the TAM is filed on a stand-alone basis, separate from a general rate case.

To that end, the guidelines contain provisions describing the general purpose and scope of TAM proceedings. The guidelines provide a list of other workpapers and supporting documents that the Company will provide with its initial filing and updates, as detailed in Appendix A. In addition, the guidelines provide specific guidance on timing and elements of different filings in TAM proceedings.

The parties note that the guidelines do not resolve all issues related to the process and scope of the TAM, citing the reservation of issues noted above. They further state that they could not reach agreement with respect to the process by which a party would object or challenge an issue regarding Pacific Power's Final Update, simply agreeing on generic language to the effect that parties reserve their procedural rights.

The stipulating parties request that the Commission adopt the guidelines because "they represent the consensus of the parties with respect to specific elements of future TAM proceedings." The parties argue the guidelines represent "a reasonable compromise among the parties and set forth clear objectives and principles presumptively

governing future TAM proceedings.”³ The parties hope that the adoption of the guidelines will streamline future TAM filings to the benefit of the Commission, the parties, and ultimately Pacific Power’s ratepayers.

V. DISCUSSION

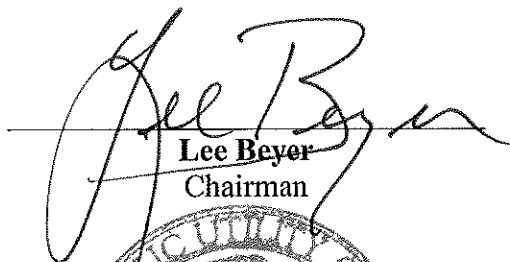
The proposed guidelines clarify and refine procedures for conducting TAM proceedings – either concurrently with a general rate case, or on a stand-alone basis. The parties to the stipulation are the same parties that have worked through these issues in the earlier TAM proceedings. Their experience informs the terms of the guidelines. Their consensus view deserves the respect of the Commission.

The guidelines should be adopted.

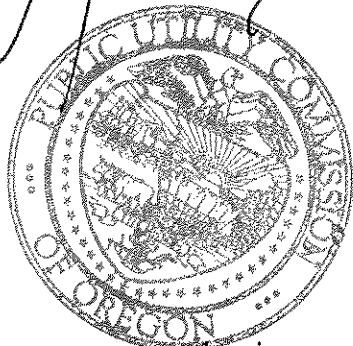
VI. ORDER

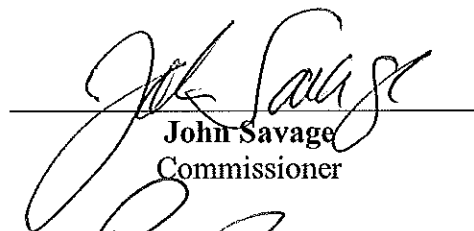
IT IS ORDERED that the Stipulation by and among PacifiCorp, dba Pacific Power, the Staff of the Public Utility Commission of Oregon, the Industrial Customers of Northwest Utilities, the Citizens’ Utility Board of Oregon, Sempra Energy Solutions LLC, is approved and is attached as Appendix A. The proposed TAM guidelines are ADOPTED.

Made, entered, and effective JUL 16 2009.




Lee Beyer
Chairman





John Savage
Commissioner



Ray Baum
Commissioner

A party may request rehearing or reconsideration of this order pursuant to ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-014-0095. A copy of any such request must also be served on each party to the proceeding as provided by OAR 860-013-0070(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480-183.484.

³ Joint Explanatory Brief, at 7.

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 199**

4 In the Matter of:

STIPULATION

5 PACIFICORP, dba PACIFIC POWER
6 2009 Transition Adjustment Mechanism
6 Schedule 200, Cost-Based Supply Service

7 This Stipulation is entered into for the purpose of resolving the issues among the
8 parties to this Stipulation related to guidelines that will govern future Transition Adjustment
9 Mechanism ("TAM") filings by PacifiCorp (or the "Company").

10 **PARTIES**

11 1. The parties to this Stipulation are PacifiCorp, Staff of the Public Utility
12 Commission of Oregon ("Staff"), the Citizens' Utility Board ("CUB"), the Industrial Customers
13 of Northwest Utilities ("ICNU"), and Sempra Energy Solutions LLC ("Sempra") (together, the
14 "Parties").

15 **BACKGROUND**

16 2. On November 12, 2008, in Order No. 08-543, the Commission adopted an all-
17 party Stipulation in this docket resolving issues related to the Company's 2009 TAM
18 proceeding. Under paragraph 17 of the Stipulation, PacifiCorp agreed to convene a series of
19 TAM workshops for the purpose of seeking consensus on the specific elements of future TAM
20 proceedings among the Parties. These issues would include, but not be limited to, cost
21 elements to be included in the initial filing and each update, requirements for the content and
22 timing of workpapers, and the mechanism for accounting for increased/decreased revenues
23 due to load growth/loss. The workshops would be convened to provide sufficient time for the
24 Company to consider incorporating recommendations into its next general rate case filing.

25 3. The Company also agreed that if the Parties could not reach consensus on the
26 elements of TAM updates, revenue growth, and filing requirements in the workshops, the

1 Company would initiate a Commission proceeding to resolve the issues. The Company
2 agreed to initiate this proceeding by January 15, 2009.

3 4. The Parties convened a number of workshops and meetings to come to
4 agreement on the design of future TAM proceedings. The Parties agreed to two extensions of
5 the January 15, 2009 filing date for the Company to initiate a Commission proceeding to
6 resolve the TAM design issues, to February 5, 2009.

7 5. On February 5, 2009, PacifiCorp filed its Compliance Filing for Initiation of
8 Commission Proceeding to Resolve TAM Design Issues. The Commission held a prehearing
9 conference on April 27, 2009 at which the Parties agreed to convene a settlement conference
10 and requested that Administrative Law Judge Patrick Power convene an additional prehearing
11 conference on May 14, 2009.

12 6. The Parties convened a settlement conference on May 7, 2008. All parties to the
13 docket participated in the settlement conference. As a result of the settlement conference, the
14 Parties have reached agreement on guidelines governing future TAM proceedings.

15 **AGREEMENT**

16 7. The Parties agree that the TAM Guidelines, attached hereto as Exhibit 1, will
17 govern the Company's future TAM filings, subject to the terms and conditions set forth in the
18 TAM Guidelines. Upon approval of this Stipulation, the Parties agree to follow the TAM
19 Guidelines for the rebuttal and final updates in UE 207; however, to the extent that sections of
20 the TAM Guidelines expressly provide that they are inapplicable to UE 207, including Section
21 A3, those sections shall not apply in UE 207. The TAM Guidelines include two attachments;
22 Attachment A identifies the net power cost components by FERC account that will be included
23 in future TAM filings and Attachment B describes the workpapers and supporting documents
24 that will be provided from the date of this Stipulation in UE 207 and with future TAM filings.

25 8. The Parties agree to submit this Stipulation to the Commission and request that
26 the Commission approve the Stipulation as presented.

1 9. This Stipulation will be offered into the record of this proceeding as evidence
2 pursuant to OAR 860-014-0085. The Parties agree to support this Stipulation throughout this
3 proceeding and any appeal, (if necessary) provide witnesses to sponsor this Stipulation at the
4 hearing, and recommend that the Commission issue an order adopting the settlements
5 contained herein.

6 10. If this Stipulation is challenged by any other party to this proceeding, the Parties
7 agree that they will continue to support the Commission's adoption of the terms of this
8 Stipulation. The Parties agree to cooperate in cross-examination and put on such a case as
9 they deem appropriate to respond fully to the issues presented, which may include raising
10 issues that are incorporated in the settlements embodied in this Stipulation.

11 11. The Parties have negotiated this Stipulation as an integrated document. If the
12 Commission rejects all or any material portion of this Stipulation or imposes additional material
13 conditions in approving this Stipulation, any Party disadvantaged by such action shall have the
14 rights provided in OAR 860-014-0085 and shall be entitled to seek reconsideration or appeal
15 of the Commission's Order.

16 12. By entering into this Stipulation, no Party shall be deemed to have approved,
17 admitted, or consented to the facts, principles, methods, or theories employed by any other
18 Party in arriving at the terms of this Stipulation, other than those specifically identified in the
19 body of this Stipulation. No Party shall be deemed to have agreed that any provision of this
20 Stipulation is appropriate for resolving issues in any other proceeding, except as specifically
21 identified in this Stipulation.

22 13. This Stipulation may be executed in counterparts and each signed counterpart
23 shall constitute an original document.

24 This Stipulation is entered into by each party on the date entered below such Party's
25 signature.

26 *Signature page follows.*

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PACIFICORP

STAFF

By: Andrea Kelly

By: _____

Date: 29 May 09

Date: _____

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SEMPRA

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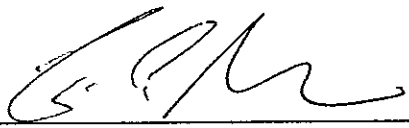
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By: *Chris Senge*

Date: _____

Date: *5/28/2009*

SEMPRA

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CUB

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SEMPRA

By: Peter Richardson

Date: May 29, 2009

PACIFIC POWER
OREGON TRANSITION ADJUSTMENT MECHANISM (TAM)
Agreement of the Parties on General Guidelines

Pacific Power's Transition Adjustment Mechanism (TAM) is an annual filing with the objective to update the forecast net power costs to account for changes in market conditions, with the final forecast update close to the direct access window to capture costs associated with direct access, and to correctly identify the proper amount for the transition adjustment.

When filed on a stand-alone basis, the TAM is intended to be narrower and more streamlined than when the TAM is filed in or processed concurrently with a general rate case. In any case, parties to a TAM proceeding should have a full opportunity to review, challenge and litigate issues raised in the case. Parties may address the issue of whether a particular TAM proceeding should have three rounds of testimony or five at the prehearing conference. Parties have not resolved and may address in UE 210, Pacific Power's general rate case, issues including but not limited to whether: (1) changes in methodologies utilized in the calculation of net power costs, such as those used to calculate normalized hydro or forced or planned outage rates or calculation issues resolved by the Commission, will be permitted in stand-alone TAM proceedings; and (2) a stand-alone TAM should include the variable costs of new generation resources if the Company will not recover the fixed costs of the generation resource in the TAM rate effective period. Issues related to the prudence of contracts, the appropriate modeling of contracts and known and measurable changes to inputs for existing methodologies are within the proper scope of a stand-alone TAM proceeding. Nothing in this agreement prevents any Party, including the Company, from advocating in a future general rate case or other proceeding other than a stand-alone TAM, that the TAM should be eliminated or revised.

A. Initial Filing

Each year, the Company will make an Initial Filing to forecast net power costs and set direct access transition adjustments for the following calendar year. In any future TAM filings after UE 207, the Initial Filing will be consistent with the following provisions:

1. At least 30 days prior to the initial filing, the Company will provide a pre-filing review to Staff, CUB and ICNU of any proposed changes to the net power cost model (e.g., new version of GRID). For this pre-filing review, the Company will provide a side-by-side comparison, where practical, of the prior year net power costs with and without the model changes. In a stand-alone TAM filing, the Company agrees not to include model changes in its forthcoming filing if Staff, CUB or ICNU objects.
2. The Initial Filing will include updates to all of the net power cost components identified in Attachment A. These costs will be based on the Company's most recent official forward price curve, forecast load and allocation factors. In a stand-

alone TAM filing, the Company will also update the steam revenues associated with Little Mountain steam sales, which are tracked in Account 456 – Other Electric Revenue. When a TAM is filed in or processed concurrently with a general rate case, this element may be included in the TAM or the general rate case. Parties have not resolved and may address in PacifiCorp's 2010 TAM, UE 207, whether non-fuel start-up costs may be included in a stand-alone TAM filing.

3. In the Initial Filing the Company will identify and provide adequate support for all known contracts it expects to be updated or added in the Rebuttal and Final updates. The Company may update or add a contract not identified in the Initial Filing if the Company demonstrates that it has followed the notification procedures in Section A4 of this Agreement and: (1) the new contract or contract update is based upon new information of which the Company reasonably became aware after the net power cost study for the Initial Filing was completed; or (2) the omission resulted from a mistake that occurred despite the Company's reasonable diligence in meeting its obligations under this Section. The Company will also identify any contracts modeled in the test period under which the Company has made a liquidated damages claim.
4. In UE 207 and any future TAM proceeding, the Company has a continuing obligation to provide notice of any correction or omission promptly after the discovery of the error or new information. In addition, the Company will file a summary of all identified corrections or omissions to the components included in the Initial Filing fifteen business days before Staff and Intervenor Direct Testimony is due.
5. The Company will provide access to the net power cost model to Parties when it makes its Initial Filing, provided that the Party has entered into a confidentiality agreement with the Company or is subject to a protective order applicable to the relevant TAM or general rate proceeding. The Parties preserve their right to challenge the confidential designation of any documents or data.
6. The Company will provide workpapers and other supporting documents as specified in Attachment B.
7. The Parties agree to ask the Commission to make the protective order for the next TAM an ongoing protective order which will continue to be effective in future TAM proceedings. The Parties to this Agreement may seek ongoing party status in Pacific Power's TAM proceedings and Pacific Power will support this request.

B. Rebuttal Update Filing

At the time the Company makes its rebuttal filing, it will include an update to forecast net power costs consistent with the following provisions:

1. The Company will update the following net power cost components, subject to the Guidelines:

- a. Most recent official forward price curve.
 - b. New power, fuel and transportation/transmission contracts, both physical and financial, and updates to existing contracts. These contracts include: (a) wholesale electric sales and purchase contracts that are for long term firm sales and purchases, short term firm sales and purchases, or exchanges and storage with and without energy or capacity prices; (b) coal and natural gas sales, purchases and transportation contracts; and (c) wheeling contracts. These transactions may have fixed prices or prices linked to market indexes. They may require physical deliveries or be settled financially (*e.g.*, swaps). Contracts must be independent and verifiable. For example, this would permit updates to coal costs under Company contracts with third parties, but would not permit updates to coal costs for mines directly or indirectly owned by the Company.
2. In its Rebuttal Update filing, the Company may make corrections to or address omissions in the components included in the Initial Filing. The Company may correct or address omissions in the components included in the Rebuttal Update filing within five business days of the date of filing of the Rebuttal Update. The Company agrees to provide notice of any impending correction promptly after the discovery of the error and agrees to correct all errors and omissions within five business days of the initial Rebuttal Update filing.
 3. Parties reserve all of their procedural rights, including the right to submit data requests and seek postponement of the hearing, related to the correction of the Rebuttal Update filing.
 4. The Company will provide workpapers and the other supporting documents as specified in Attachment B.

C. Final Updates

The Company will file final updates to net power costs and calculate transition adjustments as follows, subject to the Guidelines:

1. At least five business days prior to the direct access window, the Company will:
 - a. File an update to net power costs, incorporating the following:
 - i. Commission ordered adjustments
 - ii. Forward Price Curve from within nine days of the filing date
 - iii. New contracts, or updates to existing contracts. These contracts include: (a) wholesale electric sales and purchase contracts that are for long term firm sales and purchases, short term firm sales and purchases, or exchanges and storage with and without energy or capacity prices; and (b) natural gas sales and purchase

contracts. These transactions may have fixed prices or prices linked to market indexes. They may require physical deliveries or be settled financially (*e.g.*, swaps).

- b. Post indicative transition adjustments for Schedules 294 and 295
 - c. Provide indicative supply service net power cost rates (to be Schedule 201)
2. On November 15, in accordance with OAR 860-038-0275(1), the Company will:
 - a. File an update to net power costs incorporating the forward price curve from within seven days of the filing date.
 - b. Post final transition adjustments for Schedules 294 and 295.
 - c. Provide supply service net power cost rates (to be Schedule 201)
 3. The Company will provide workpapers and other supporting documents for both the indicative and final filings as specified in Attachment B.

If a Party objects to any aspect of the Final Update, the Party reserves all of its procedural rights seek review of the controverted issue.

4. The Parties agree to meet and review whether to recommend to the Commission an extension in length for the shopping window for PacifiCorp's multi-year direct access option beginning in November 2009.

D. Rate Design

1. In the Company's current general rate case, proposed net power costs are unbundled from other generation costs. All net power costs will be collected through a new Schedule 201, Net Power Costs - Transition Adjustment Mechanism, which will be applied as a rider to Schedule 200. Schedule 200 will continue to collect other generation costs.
2. In any future TAM filed in or processed concurrently with a general rate case after UE 207, the TAM rate design test year will be the general rate case rate design test year. In a stand alone TAM, the TAM rate design test year will be the forecast test year during which the Schedule 201 rates will be effective.
3. If PacifiCorp has not filed a general rate case within four years of the filing of UE 210, and does not plan to file a rate case by March 1, 2014, the Company will convene technical workshops no later than July 1, 2013 to provide the parties to the "Agreement of the Parties on General Guidelines" with relevant information to allow parties to make a preliminary determination if the then-current rate spread for its TAM rates may be unfair, unjust or unreasonable. If one or more parties to the "Agreement of the Parties on General Guidelines" makes a

preliminary determination, by September 1, 2013, that the then-current rate spread for its TAM rates may be unfair, unjust or unreasonable, PacifiCorp will file its next application as a TAM filed in or processed concurrently with a general rate case.

4. In any future TAM filed in or processed concurrently with a general rate case after UE 207, proposed Schedule 201 revenues by rate schedule will be determined by spreading the total forecast net power costs for the test year to the rate schedules in the same manner as the revenues for Schedule 200 are spread to the rate schedules: based on the functionalized revenue requirement as determined by the Commission based upon a Cost of Service study, or by the method proscribed by the Commission in the most recent general rate case or Commission proceeding regarding rate spread and rate design.

In any future stand-alone TAM, Proposed Schedule 201 revenues by rate schedule will be determined by spreading the total forecast net power costs for the test year to the rate schedules based upon each schedule's proportion of "Present Schedule 201 revenues." "Present Schedule 201 revenues" for the test year shall reflect the projected test year sales forecasts. Proposed Schedule 201 rate design shall reflect the method prescribed by the Commission in the most recent general rate case or other Commission proceeding regarding rate spread and rate design.

E. TAM Filings Made in or Processed Concurrently with a General Rate Case

In all future TAM filings after UE 207 in a year in which the Company files a general rate case, the TAM will be included in or processed concurrently with the general rate case filing. In future filings after UE 207, the Company agrees that both filings will be made no later than March 1 to allow for a January 1 rate effective date. This commitment will cease if the TAM is eliminated or there are material changes in these TAM Design Guidelines. If the TAM is filed on a stand-alone basis, it will be filed no later than April 1. In order to accommodate the direct access window that begins November 15, the TAM may be bifurcated from the full rate case in order to allow for a Commission decision by November 1. Bifurcation of the TAM does not alter any provision below.

When a TAM is filed in or processed concurrently with a general rate case, the Company or any Party may propose changes to how the Company's Rate Mitigation Adjustment or other rate spread tools should operate in a stand-alone TAM filing made before the TAM is again filed in or processed concurrently with a general rate case.

When a TAM is filed in or processed concurrently with a general rate case, the TAM will be subject to rebuttal and final updates identified above and to the agreements on workpapers and other supporting documents specified in Attachment B.

ATTACHMENT A

FERC Accounts for Net Power Costs

- Account 447 - Sales for Resale, excluding on-system wholesale sales and other revenues that are not modeled in GRID
- Account 501 - Fuel Expense, steam generation; excluding fuel handling, start up fuel/gas¹, diesel fuel, residual disposal and other costs that are not modeled in GRID
- Account 503 - Steam from Other Sources
- Account 547 - Fuel Expense, other generation
- Account 555 - Purchased Power, excluding BPA residential exchange credit pass-through
- Account 565 - Wheeling Expense

¹ Start up fuel is accounted for separate from the primary fuel for steam power generation plants. Start up costs are not accounted for separately for natural gas plants, and therefore all fuel for natural gas plants is included in the determination of NPC.

ATTACHMENT B

TAM Workpapers and Supporting Documents

Workpapers are defined in OAR 860-013-00175(1)(a) as "those documents which show the source, calculations and details supporting the testimony and other exhibits." In a TAM proceeding, the term "workpapers" means the documents used to develop the final inputs to GRID and the final modeling in GRID. 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..

If the Commission adopts new minimum filing requirements, rules or guidelines for net power cost filings, these will replace the requirements set forth in this document. Additionally, if the TAM is eliminated, the TAM Design Guidelines to which this document is attached are materially changed, or the Parties otherwise agree, the requirements set forth in this document will cease to be operative. 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 TAM (UE-199), the relevant citations to which are listed below, as long as these filing requirements remain operative.

The Parties 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. The GRID model and its inputs, however, will be produced on the day of the filing electronically to the Parties in accordance with the terms of the stipulation in Docket UE 199. Parties will expeditiously work to rectify any workpaper deficiencies without requiring other Parties to submit follow-up data requests.

In cases where the Company has relied upon documents or workpapers it considers to be "highly confidential" it will notify the Parties of such, and, if the amount of data considered highly confidential is limited, it will redact the highly confidential data or otherwise modify the non-confidential workpapers to prevent disclosure of highly confidential material. If the Company has withheld any information on the grounds that the information is "highly confidential," the Company will request a "highly confidential" protective order or other special handling measures within five days of providing the non-highly confidential material.

A. Initial Filing by Company

For the Initial Filing, PacifiCorp will provide workpapers and supporting documents as described below. All information will be provided electronically and, in the case of Excel spreadsheets, with all cells and formulas intact.

1. Concurrent with the filing:
 - a) Workpapers that show the source, calculations and details supporting the testimony and other exhibits. 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 Four Year Period used to determine outage rates and other input items in the net power cost model.
 - c) Compilations of actual net power costs produced by PacifiCorp that were referenced in the testimony or exhibits, to the extent that actual power cost results are discussed or cited in the Company's direct testimony or exhibits. *See, e.g., ICNU 1.5-1 in UE 199.*
 - d) A list and explanation of all modeling or logic changes or enhancements to the net power cost model that have been implemented since the most recent Oregon TAM or general rate case. 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 the Parties:
 - 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 four-year period, including NERC cause code, type of event, duration, energy lost, etc. *See, e.g., ICNU 1.6-1 and 1.6-2 in UE 199.*
 - b) The heat rate curves for each resource and the spreadsheets showing the derivation of the heat rate curves. *See, e.g., ICNU 1.22 in UE 199.*
 - c) Workpapers and documentation supporting the inputs contained in the "Other Cost" file as of UE 199, 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. *See, e.g., ICNU 1.28 in UE 199.*
 - 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. *See, e.g., ICNU 1.29 in UE 199.*
 - 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. *See, e.g., ICNU 1.31 in UE 199.*

3. As soon as practical after filing, delivered on an as-ready basis, but no later than 15 days after the Initial Filing, the Company will deliver to the Parties:

- 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 Pro-Forma Period. *See, e.g.,* ICNU 1.2 in UE 199.
- 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 TAM or GRC case 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. *See, e.g.,* ICNU 1.3 and 1.68 in UE 199.
- 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.
- d) Documents showing all short-term firm transactions (including short-term firm indexed transactions and swaps) modeled in the test year power cost study, *see, e.g.,* ICNU 1.11, and as long as the Commission retains an adjustment for wholesale trading margin, the backup for the calculation of the trading margin, *see, e.g.* 1.13 and ICNU Supplemental 18.24 in UE 199. In addition, each contract will have a designation as to its purpose (i.e., trading, arbitrage or balancing.)
- e) For all power, fuel and transmission related contracts modeled in GRID that were not included in the most recent Oregon TAM or general rate case:
 - 1. A copy of the contract (in pdf or electronic format, if available).
 - 2. Any workpapers or other documents used to develop the power cost model input assumptions related to the contract.
- f) Regulatory Fuel Budget filing used for the test year and any other workpapers used in developing the power cost model fuel cost inputs.
- 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. *See, e.g.,* ICNU 1.30 in UE 199.
- 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 Oregon TAM case or GRC, if applicable.
- i) Workpapers explaining the development of each line of load adjustments presented on the Company’s power cost model output reports. *See, e.g.,* ICNU 1.53 in UE 199. These include but are not limited to:
 - 1. DSM (irrigation)
 - 2. MagCorp Curtailment
 - 3. Monsanto Curtailment
 - 4. Station Service
- j) Workpapers used to develop inputs for QF contracts modeled in GRID. *See, e.g.,* ICNU 1.33b in UE 199.
- k) A forty-year hydro data set suitable for input into the GRID model applicable to the test year so long as the Company has been required by regulators in proceedings in other states to produce this material, and the Company proposes to change its hydro modeling from the single (Median hydro) scenario filed in the initial filing in UE 207.

- l) Data necessary to calculate forced outages using a weekday/weekend split unless this is excluded from the forced outage rate methodology authorized by the Commission in UM 1355. *See, e.g.*, ICNU 1.6-1 in UE 199, which is included in c) above.
- m) Sample calculations of the transition adjustments for Schedule 30 Secondary and Schedule 48 Primary in Schedule 294, with all supporting documentation.
- n) Workpapers for any screens applied to prevent uneconomic commitment and dispatch of resources in the GRID model.
- o) Supporting transaction level detail for compilations of actual power costs produced by PacifiCorp that were referenced in the testimony or exhibits, to the extent that actual power costs results are discussed or cited in the Company's direct testimony or exhibits. *See, e.g.* ICNU 1.5-2 in UE 199.
- p) Workpapers and all supporting documents underlying the start-up fuel and start-up O&M costs included in GRID.

B. Response Filing (or Surrebuttal Filing, if applicable) by Staff and Intervenors
Parties filing testimony in response to the Company's Initial Filing (or Rebuttal Filing, if applicable), will provide workpapers and supporting documents as described below.

1. Concurrent with the filing:

- 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 be provided as well.

C. Rebuttal Update Filing (and Sursurrebuttal Filing, if applicable) and Final Updates by Company

For the Rebuttal Update Filing and Final Updates, Pacific Power will provide workpapers and supporting documents as described below.

1. Concurrent with the filing:

- a) Workpapers that show the source, calculations and details supporting the testimony and other exhibits. The workpapers will include the net power costs 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 after filing, but no later than 3 days after the filing:

- a) To the extent that any of the items in Section A above change, new versions of the supporting documentation and workpapers will be provided.

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.

D. Other Items

1. The Company will provide information on new contracts or updates to contracts that are executed after the Rebuttal Filing and will be included in the Final Updates as soon as practical after execution. The Company will track the contracts and produce them in groups as their total number or value become material.
2. The Company will provide broker quotes compared to the Company's forward price curve used in the final net power cost update as soon as practical.