Exhibit No. BGM-5C Docket UE-152253 Witness: Bradley G. Mullins

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND () TRANSPORTATION COMMISSION, ()	
Complainant,	
v.)	DOCKET UE-152253
PACIFIC POWER & LIGHT COMPANY,	
Respondent.	
)	

EXHIBIT NO. BGM-5C

COMPANY RESPONSES TO DISCOVERY REQUESTS

(REDACTED)

Boise Data Request 009

On December 18, 2015, the President signed into law the Protecting Americans from Tax Hikes (PATH) Act of 2015, which, among other things, extended bonus depreciation and made the research and development tax credit permanent. Please recalculate the revenue requirements—for both the first and second rate periods proposed in this proceeding in a manner that takes into consideration the provisions of the PATH Act of 2015 and provide all work papers supporting the updated revenue requirements amounts.

Response to Boise Data Request 009

Please refer to Confidential Attachment Boise 009-1, Attachment Boise 009-2, and Attachment Boise 009-3 for recalculation of first rate period revenue requirement taking into account provisions of the Protecting Americans from Tax Hikes (PATH) Act of 2015. Please refer to Confidential Attachment Boise 009-4 and Attachments Boise 009-5 through 009-7 for recalculation of second rate period revenue requirement, taking into account the same PATH Act provisions. Below is a summary index of attachments provided in response to this data request:

Attachment	Description of File
Boise 009-1 -	REVISED Adj 8.4 – Major Plant Additions with Bonus Depreciation (Year 1)
Confidential	
Boise 009-2	REVISED Tab 7 Adj – 7.1 Interest; 7.4 PowerTax ADIT; 7.7 State Deferred Rem.
Boise 009-3	RAM/JAM with 4 adjustments above revised for Bonus Depreciation
Boise 009-4 –	REVISED Adj No. 1 through 3 from Exhibit SEM-4 (Pro Forma Major Plant
Confidential	additions) with Bonus Depreciation (Year 2)
Boise 009-5	REVISED State Deferred Removal (Adj No. 5 – SEM-4)
Boise 009-6	REVISED Interest True-Up (Adj No.6 – SEM-4)
Boise 009-7	REVISED Exhibit SEM-4 – Year 2 Rev Req calculation with Bonus Depreciation

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: Sherona Cheung

Attachment Boise 009-3

PACIFICORP WASHINGTON Normalized Results of Operations - West Control Area 12 Months Ended JUNE 2015

		(1) Total Adjusted Results	(2) Price Change	(3) Results with Price Change
2 G	Operating Revenues: eneral Business Revenues terdepartmental	205,927,969	10,495,379	216,423,348
4 S	pecial Sales	-		
	ther Operating Revenues	9,320,426		
6 7	Total Operating Revenues	215,248,395		
	Operating Expenses:			
	team Production	14,047,910		
10 N	uclear Production	-		
	ydro Production	6,649,311		
	ther Power Supply	9,720,488		
	ansmission istribution	5,578,176 11,115,084		
	ustomer Accounting	6,342,566	54,660	6,397,226
	ustomer Service & Info	761,220	0 1,000	0,001,220
17 Sa	ales	-		
	dministrative & General	10,155,481		
	Total O&M Expenses	64,370,235		
	epreciation mortization	56,225,842 4,757,954		
	axes Other Than Income	21,662,321	427,519	22,089,840
	come Taxes - Federal	13,081,297	3,504,620	16,585,917
	come Taxes - State	-	-	-
25 In	come Taxes - Def Net	647,236		
	vestment Tax Credit Adj.	-		
	isc Revenue & Expense	7,269	0.000 700	101 700 050
	Total Operating Expenses:	160,752,154	3,986,799	164,738,953
29 30 31	Operating Rev For Return:	54,496,241	6,508,580	61,004,821
32	Rate Base:			
	ectric Plant In Service	1,812,053,781		
	ant Held for Future Use	424,723		
	isc Deferred Debits	397,121		
	ec Plant Acq Adj uclear Fuel	-		
	repayments	(1)		
	uel Stock	0		
	aterial & Supplies	(0)		
	orking Capital	23,962,203		
	eatherization Loans	1,840,890		
	isc Rate Base			
	Total Electric Plant:	1,838,678,717	-	1,838,678,717
45 46 R	ate Base Deductions:			
	ccum Prov For Deprec	(695,354,089)		
	ccum Prov For Amort	(52,956,681)		
	ccum Def Income Tax	(246,981,452)		
50 U	namortized ITC	(106,780)		
	ustomer Adv For Const	(972,510)		
	ustomer Service Deposits	(3,272,583)		
	isc Rate Base Deductions	(3,351,815)		
54 55	Total Rate Base Deductions	(1,002,995,910)	-	(1,002,995,910)
56		(1,002,000,010)		(1,002,000,010)
	Total Rate Base:	835,682,807	-	835,682,807
58	=			
	eturn on Rate Base	6.52%		7.300%
	eturn on Equity	7.91%		9.50%
61 62 T				
	AX CALCULATION: perating Revenue	68,224,774	10,013,200	78,237,974
	ther Deductions	00,224,774	10,013,200	10,231,914
	terest (AFUDC)	(2,385,952)	-	(2,385,952)
	terest	22,012,704	-	22,012,704
67 S	chedule "M" Additions	76,842,780	-	76,842,780
	chedule "M" Deductions	73,772,733	-	73,772,733
	come Before Tax	51,668,069	10,013,200	61,681,269
70	ata Incomo Toxos			
	tate Income Taxes	- 51,668,069	- 10,013,200	- 61,681,269
73	=	51,000,003	10,013,200	01,001,208
	ederal Income Taxes + Other	13,081,297	3,504,620	16,585,917
	=	Ref Page 2.2	Ref Page 1.2	

Ref. Page 2.2 Ref. Page 1.2

Exhibit No. BGM-5C Page 3 of 39

Attachment Boise 009-3 Page 1.2

PACIFICORP WASHINGTON Normalized Results of Operations - West Control Area 12 Months Ended JUNE 2015

Net Rate Base - Washington Jurisdiction Return on Rate Base Requested	\$	835,682,807 7.300%	Ref. Page 1.1 Ref. Page 2.1
Revenues Required to Earn Requested Return Less Current Operating Revenues		61,004,821 (54,496,241)	
Increase to Current Revenues Net to Gross Bump-up		6,508,580 161.254%	
Price Change Required for Requested Return	\$	10,495,379	
Requested Price Change Uncollectible Percent	\$	10,495,379 0.521%	Ref. Page 1.3
Increased Uncollectible Expense	\$	54,660	
Requested Price Change	\$	10,495,379	
WUTC Regulatory Fee		0.200%	Ref. Page 1.3
Revenue Tax		3.873%	Ref. Page 1.3
Resource Supplier Tax		0.000%	Ref. Page 1.3
Gross Receipts		0.000%	Ref. Page 1.3
Increase Taxes Other Than Income	\$	427,519	
Requested Price Change	\$	10,495,379	
Uncollectible Expense		(54,660)	
Taxes Other Than Income	<u>_</u>	(427,519)	
Income Before Taxes	\$	10,013,200	
State Effective Tax Rate		0.000%	Ref. Page 2.1
State Income Taxes	\$	-	-
Taxable Income	\$	10,013,200	
Federal Income Tax Rate		35.00%	Ref. Page 2.1
Federal Income Taxes	\$	3,504,620	
Operating Income		100.000%	
Net Operating Income		62.014%	Ref. Page 1.3
Net to Gross Bump-Up		161.2539%	

Exhibit No. BGM-5C Page 4 of 39

Attachment Boise 009-3 Page 1.3

PACIFICORP WASHINGTON Normalized Results of Operations - West Control Area 12 Months Ended JUNE 2015

Operating Revenue	100.000%
Operating Deductions Uncollectible Accounts WUTC Regulatory Fee Taxes Other - Revenue Tax Taxes Other - Resource Supplier Taxes Other - Gross Receipts	0.521% (1) 0.200% 3.873% 0.000% 0.000%
Sub-Total	95.406%
State Income Tax @ 0.000%	0.000%
Sub-Total	95.406%
Federal Income Tax @ 35.00%	33.392%
Net Operating Income	62.014%
 Uncollectible Accounts: (a) Uncollectible Accounts (FERC Account 904) (b) General Business Revenues Uncollectible Accounts % 	1,631,117 Ref. 4.10.1. Line 2 313,192,771 Ref. 4.10.1. Line 3 0.521% (a) / (b)

PacifiCorp Washington Expedited Rate Filing - June 2015 Year-Two Revenue Requirement Calculation - Summary of Adjustments

Year-Two Incremental Revenue Requirement Adjustment Summary

The table below presents the Company's pro forma ratemaking adjustments and their impact on net operating income (NOI), rate base, and the Washington revenue requirement for the second step rate increase request in the Company's proposed Two-Year Rate Plan.

	Α	В	С	D	Е	F
Line No.	Adj. No.	Adj. Description	NOI	Rate Base	Rev. Req.	Reference
1	1	Jim Bridger Unit 4 Overhaul & SCR Installation - REVISED	(1,482,437)	24,027,445	5,218,907	Attachment Boise 009-4 CONF
2	2	SCADA EMS Replacement & Upgrade - REVISED	(72,092)	1,504,916	293,404	Attachment Boise 009-4 CONF
3	3	Union Gap Transmission Project - REVISED	(58,987)	3,638,605	523,440	Attachment Boise 009-4 CONF
4	4	Production Tax Credit	(2,625,951)	-	4,234,464	Exhibit No(SEM-4), Tab 2, Adj. 4
5	5	Remove Deferred State Tax Expense & Balance - REVISED	(5,106)	(2,553)	7,933	Attachment Boise 009-5
6	6	Interest True Up - REVISED	268,914	-	(433,635)	Attachment Boise 009-6
7						
8		Subtotal Normalizing Adjustments	(3,975,659)	29,168,413	9,844,513	
9						
10		Total Incremental Revenue Requirement	(3,975,659)	29,168,413	9,844,513	
11						

11 12

13 Notes:

14 (1) The revenue requirement column is calculated using the Company's approved return on rate base of 7.30% and NOI conversion factor

15 of 62.014%. The development of these percentages can be found in Exhibit No.___(SEM-3) on pages 2.1 and 1.3 respectively.

Exhibit No. BGM-5C Page 5 of 39 Attachment Boise 0009-7

Tab 2 Page 1 of 1

Boise Data Request 0013

Please provide work papers recalculating the Company's revenue requirement on an average-of-monthly-averages (AMA) basis, including reflection of the PATH Act of 2015.

Response to Boise Data Request 0013

Please refer to Attachment Boise 0013-1 through Attachment Boise 0013-11 for recalculation work papers as requested. A summary of attachments provided in response to this data request is provided in the table below. Please also refer to Attachment Boise 009-2 for a copy of the revised adjustment 8.4 (Major Plant Additions) that includes Bonus Depreciation.

Attachment Ref.	Adjustment
Attach Boise 0013-1	Revised RAM/JAM Model
Attach Boise 0013-2	5.2 – Colstrip #3 Removal - REVISED
Attach Boise 0013-3	6.1 - End-of-Period Plant Reserves - REVISED
Attach Boise 0013-4	6.2 – Annualization of Base Period Depr/Amort.
	Expense - REVISED
Attach Boise 0013-5	6.3 – Hydro Decommissioning - REVISED
Attach Boise 0013-6	8.1 – Jim Bridger Rate Base - REVISED
Attach Boise 0013-7	8.11 – End-of-Period Plant Balances - REVISED
Attach Boise 0013-8	8.13 – Idaho Asset Exchange - REVISED
Attach Boise 0013-9	7.4 – PowerTax ADIT - REVISED
Attach Boise 0013-10	7.1 – Interest True-Up - REVISED
Attach Boise 0013-11	7.7 – Remove State Deferred - REVISED

PREPARER: Sherona Cheung

Attachment Boise 0013-1

Page 1.1

PACIFICORP WASHINGTON Normalized Results of Operations - West Control Area 12 Months Ended JUNE 2015

	(1) Total Adjusted Results	(2) Price Change	(3) Results with Price Change
1 Operating Revenues: 2 General Business Revenues 3 Interdepartmental	205,927,969 -	9,116,219	215,044,188
4 Special Sales	0 320 426		
5 Other Operating Revenues6 Total Operating Revenues	<u>9,320,426</u> 215,248,395		
7	213,240,333		
8 Operating Expenses:			
9 Steam Production	14,047,910		
10 Nuclear Production	-		
11 Hydro Production	6,649,311		
12 Other Power Supply	9,720,488		
13 Transmission	5,578,176		
14 Distribution	11,115,084	47 470	6 200 042
15 Customer Accounting 16 Customer Service & Info	6,342,566 761,220	47,478	6,390,043
17 Sales	761,220		
18 Administrative & General	10,155,481		
19 Total O&M Expenses	64,370,235		
20 Depreciation	55,705,295		
21 Amortization	4,714,285		
22 Taxes Other Than Income	21,662,321	371,340	22,033,661
23 Income Taxes - Federal	13,151,913	3,044,091	16,196,004
24 Income Taxes - State	-	-	-
25 Income Taxes - Def Net	844,711		
26 Investment Tax Credit Adj.	-		
27 Misc Revenue & Expense	7,269 160,456,030	2 462 008	162 010 020
28 Total Operating Expenses:29	180,438,030	3,462,908	163,918,938
30 Operating Rev For Return:	54,792,365	5,653,311	60,445,676
31		0,000,011	00,110,010
32 Rate Base:			
33 Electric Plant In Service	1,783,992,361		
34 Plant Held for Future Use	424,723		
35 Misc Deferred Debits	487,681		
36 Elec Plant Acq Adj	-		
37 Nuclear Fuel	-		
38 Prepayments	(1)		
39 Fuel Stock	0		
40 Material & Supplies 41 Working Capital	(0) 23,962,203		
42 Weatherization Loans	1,840,890		
43 Misc Rate Base	-		
44 Total Electric Plant:	1,810,707,857	_	1,810,707,857
45			, , ,
46 Rate Base Deductions:			
47 Accum Prov For Deprec	(680,422,054)		
48 Accum Prov For Amort	(51,041,927)		
49 Accum Def Income Tax	(243,517,345)		
50 Unamortized ITC	(106,369)		
51 Customer Adv For Const 52 Customer Service Deposits	(972,510) (3,272,583)		
53 Misc Rate Base Deductions	(3,351,815)		
54	(0,001,010)		
55 Total Rate Base Deductions	(982,684,603)	_	(982,684,603)
56			, <i>, , , , ,</i>
57 Total Rate Base:	828,023,254	-	828,023,254
58			
59 Return on Rate Base	6.62%		7.300%
60 Return on Equity	8.11%		9.50%
61 62 TAX CALCULATION:			
63 Operating Revenue	68,788,989	8,697,402	77,486,391
64 Other Deductions	00,700,909	8,097,402	77,400,591
65 Interest (AFUDC)	(2,385,952)	-	(2,385,952)
66 Interest	21,810,944	-	21,810,944
67 Schedule "M" Additions	76,278,564	-	76,278,564
68 Schedule "M" Deductions	73,772,733		73,772,733
69 Income Before Tax	51,869,829	8,697,402	60,567,231
70			
71 State Income Taxes		-	-
72 Taxable Income	51,869,829	8,697,402	60,567,231
73 74 Federal Income Taxes + Other	12 151 012	3,044,091	16,196,004
	13,151,913	3,044,031	10,190,004
	Ref. Page 2.2	Ref. Page 1.2	

Ref. Page 2.2 Ref. Page 1.2

Attachment Boise 0013-1

Page 1.2

PACIFICORP WASHINGTON Normalized Results of Operations - West Control Area 12 Months Ended JUNE 2015

Net Rate Base - Washington Jurisdiction Return on Rate Base Requested Revenues Required to Earn Requested Return Less Current Operating Revenues Increase to Current Revenues Net to Gross Bump-up	\$	828,023,254 7.300% 60,445,676 (54,792,365) 5,653,311 161.254%	Ref. Page 1.1 Ref. Page 2.1
Price Change Required for Requested Return	\$	9,116,219	
Requested Price Change Uncollectible Percent Increased Uncollectible Expense	\$ \$	9,116,219 0.521% 47,478	Ref. Page 1.3
Requested Price Change WUTC Regulatory Fee Revenue Tax Resource Supplier Tax Gross Receipts Increase Taxes Other Than Income	\$	9,116,219 0.200% 3.873% 0.000% 0.000% 371,340	Ref. Page 1.3 Ref. Page 1.3 Ref. Page 1.3 Ref. Page 1.3
Requested Price Change Uncollectible Expense Taxes Other Than Income Income Before Taxes	\$	9,116,219 (47,478) (371,340) 8,697,402	
State Effective Tax Rate State Income Taxes	\$	0.000%	Ref. Page 2.1
Taxable Income Federal Income Tax Rate Federal Income Taxes	\$ \$	8,697,402 35.00% 3,044,091	Ref. Page 2.1
Operating Income Net Operating Income Net to Gross Bump-Up		100.000% 62.014% 161.2539%	Ref. Page 1.3

Attachment Boise 0013-1

Page 1.3

PACIFICORP WASHINGTON Normalized Results of Operations - West Control Area 12 Months Ended JUNE 2015

Operating Revenue	100.000%
Operating Deductions Uncollectible Accounts WUTC Regulatory Fee Taxes Other - Revenue Tax Taxes Other - Resource Supplier Taxes Other - Gross Receipts	0.521% (1) 0.200% 3.873% 0.000% 0.000%
Sub-Total	95.406%
State Income Tax @ 0.000%	0.000%
Sub-Total	95.406%
Federal Income Tax @ 35.00%	33.392%
Net Operating Income	62.014%
 Uncollectible Accounts: (a) Uncollectible Accounts (FERC Account 904) (b) General Business Revenues Uncollectible Accounts % 	1,631,117 Ref. 4.10.1. Line 2 313,192,771 Ref. 4.10.1. Line 3 0.521% (a) / (b)

Boise Data Request 0014

In the Company's 2014 General Rate Case, Dockets UE-140762 *et al.*, the Commission declined to include any costs or benefits associated with the Energy Imbalance Market (EIM) in rates. In this proceeding, there are presumably costs—both capital and operations and maintenance (O&M) expenses— associated with the EIM reflected in the June 2015 test period results. The Company, however, has made no corresponding adjustment to account for EIM benefits in this proceeding. Does the Company agree that it would violate the matching principle to include the costs associated with the EIM in base rates, while excluding the corresponding EIM benefits from base rates? Please provide explanation for the Company's response.

Response to Boise Data Request 0014

The Company does not agree that the matching principle will be violated; energy imbalance market (EIM) benefits will flow through the Company's net power costs (NPC) and will be reflected in the annual power cost adjustment mechanism (PCAM) filings.

PREPARER: Bryce Dalley

SPONSOR: Bryce Dalley

Boise Data Request 0016

Please identify the total amount of rate base—including separate detail for gross plant, depreciation reserves and ADIT—associated with the EIM included in the Company's June 2015 results. Please provide this information on both a total-Company and Washington-allocated basis.

Response to Boise Data Request 0016

Please refer to Attachment Boise 0016.

PREPARER: Cary Boyle

SPONSOR: To be determined

WA UE-152253 Boise 0016

EIM Deferrals WA Data Request 0016 Docket No. UE-152253 Boise White Paper, LLC Second Set of Data Requests

Period	Gross Plant Balance	WA Allocated Basis
Jun-14	-	
Jul-14	122,248	5,160
Aug-14	168,062	5,187
Sep-14	225,606	6,983
Oct-14	226,686	6,983
Nov-14	12,497,016	1,469,096
Dec-14	16,110,805	1,869,143
Jan-15	15,880,955	1,854,135
Feb-15	16,178,321	1,893,168
Mar-15	16,207,363	1,896,137
Apr-15	16,234,303	1,898,617
May-15	16,238,756	1,899,358
Jun-15	16,221,428	1,898,279
AMA	9,850,070	1,146,092

Period	Depreciation Accrual	Reserve Adjustment	Depr. Reserve Balance	WA Allocated Basis
	Accidai	Aujustinent	Dalarice	Dasis
Jun-14	-	-	-	-
Jul-14	(219)	-	(219)	(9)
Aug-14	(520)	-	(739)	(28)
Sep-14	(816)	-	(1,555)	(74)
Oct-14	(906)	-	(2,461)	(121)
Nov-14	(96,115)	-	(98,577)	(12,136)
Dec-14	(265,956)	-	(364,533)	(46,014)
Jan-15	(246,094)	-	(610,627)	(76,660)
Feb-15	(248,232)	-	(858,859)	(107,819)
Mar-15	(248,636)	(145,560)	(1,253,055)	(148,598)
Apr-15	(248,236)	-	(1,501,290)	(179,699)
May-15	(231,776)	-	(1,733,067)	(209,713)
Jun-15	(213,679)	45,634	(1,901,111)	(234,779)
AMA			(614,628)	(74,855)

	ADIT	WA Allocated
Period	Balance	Basis
Jun-14	-	-
Jul-14	(82,221)	(3,470)
Aug-14	(164,328)	(6,004)
Sep-14	(246,322)	(8,542)
Oct-14	(273,413)	(9,377)
Nov-14	(2,013,133)	(224,347)
Dec-14	(3,688,395)	(429,019)
Jan-15	(3,680,978)	(427,715)
Feb-15	(3,672,748)	(426,311)
Mar-15	(3,632,462)	(422,573)
Apr-15	(3,600,894)	(419,728)
May-15	(3,598,911)	(419,211)
Jun-15	(3,621,113)	(420,879)
AMA	(2,205,363)	(250,561)

Boise Data Request 0017

Please identify the total amount of O&M Expense associated with the EIM included in the Company's June 2015 results. Please provide this information on both a total-Company and Washington-allocated basis.

Response to Boise Data Request 0017

Please refer to Attachment Boise 0017.

PREPARER: Cary Boyle

SPONSOR: To be determined

Exhibit No. BGM-5C Page 14 of 39 Attachment Boise 0017

WA UE-152253 Boise 0017

EIM Deferrals WA Data Request 0017 Docket No. UE-152253 Boise White Paper, LLC Second Set of Data Requests

	O&M	WA Allocated
Period	Expense	Basis
Jul-14	186,354	15,325
Aug-14	(108,695)	(9,108)
Sep-14	28,757	2,354
Oct-14	22,974	1,886
Nov-14	14,715	1,163
Dec-14	587,288	48,229
Jan-15	313,463	25,746
Feb-15	474,419	38,997
Mar-15	(66,474)	(5,474)
Apr-15	159,448	13,050
May-15	63,833	5,227
Jun-15	153,791	12,692
Total	1,829,872	150,089
	······································	

Boise Data Request 0019

Please provide detail of each of the Company's existing Washingtonjurisdictional regulatory assets, including a monthly amortization schedule for each asset through December 31, 2018.

Response to Boise Data Request 0019

Please refer to Attachment Boise 0019 for detail of existing Washingtonjurisdictional regulatory assets with amortization schedules through December 31, 2018.

PREPARER: Mark Reis

WASHINGTON Reg. Asset Summary Schedule As of Decembr 31, 2015

Account	Tab	Description	12/31/2015 BALANCE
187051	(a)	WA Colstrip #3 Deferred Revenue	265,318.74
187347	(b)	WA Preferred Stock Redemption Loss	108,761.34
187356	(C)	WA Merwin Project Deferral	162,585.67
187892	(d)	WA REC Refund Tracker	3,169,877.33
187910	(e)	WA Hydro Deferral of Deferred Excess NPC	(132,174.01)
187921	(f)	WA Chehalis Plant Revenue Requirement	-

Boise Data Request 0031

Reference Exh. No. SEM-3, Tab 6.4, "Accelerated Depreciation on Jim Bridger and Colstrip": in Excel range "F14:F15," the Company calculates the rate base impact of accelerated coal plant depreciation to be 50% of incremental depreciation expense. An explanation for this 50% factor was not given in the work paper. It appears, however, that a 50% factor may have been used to convert the incremental depreciation expense into an amount reflective of average rate base. Please provide an explanation of the purpose for the 50% factor in Excel range "F14:F15." Please also explain how the application of that 50% factor is consistent with the Company's proposal to use end-of-period rate base.

Response to Boise Data Request 0031

The amounts reflected in Microsoft Excel range "F14:F15" in Tab 6.4 of Exhibit No. SEM-3 represent the equivalent of an average-of-monthly-average (AMA) calculation. In the first year of any depreciation amounts where corresponding depreciation reserves build up starting with a zero-balance, assuming straight-line depreciation throughout the year, the AMA reserve will equal the mid-point (7th month) balance of the 13 months of data used to calculate the AMA reserves, or in other words, 50 percent of the annual depreciation expense amount. Attachment Boise 0031 provides a monthly schedule of the incremental depreciation expense and reserves. Reserves in this attachment is calculated using a traditional AMA formula and proves that the amounts reflected in the Microsoft Excel range in question in fact matches an AMA-formula-derived incremental depreciation reserve balance.

As discussed on page 7 and 8 of Ms. McCoy's direct testimony, end-of-period (EOP) rate base methodology is applied only to the historical balances for the 12 months ended June 2015. The Company's only requested post-test-period capital addition is reflected in rate base on an AMA basis for the rate-effective period of the current proceeding, included as such to reflect the average rate base that will be in service and serving customers during the rate-effective period. Therefore, consistent with rate-effective period rate base addition balances being included on AMA balances, rate-effective period incremental reserves are also included on an AMA basis.

PREPARER: Shelley McCoy

Boise Data Request 0048

Reference the Company Response to Boise Data Request 019: Please provide an explanation for why the regulatory asset related to the Hydro Deferral contains a residual balance of (-)\$132,174.01.

Response to Boise Data Request 0048

When the Company's collection mechanism was turned off in June 2012, the balance was already in an over-collected position.

PREPARER: Shelley McCoy

Boise Data Request 0049

Reference the Company Response to Boise Data Request 019: Boise believes that the residual Hydro Deferral balance of (-)\$132,174.01 should be refunded to customers. Please provide an explanation of whether the Company would support refunding such balance, and, if not, why the Company believes that a refund is inappropriate.

Response to Boise Data Request 0049

The Company intends to credit the residual balance to customers.

PREPARER: Natasha Siores

Boise Data Request 0054

Reference McCoy Workpaper, Tab B.2 O&M Expense, Page 7. Please provide an explanation for the \$97,000 in O&M expense titled "OTH EXP-CHOLLA REG" allocated to Washington, including justification for why that amount should be allocated to Washington rates.

Response to Boise Data Request 0054

The \$97,000 reduction in Operating and Maintenance (O&M) expense in the above referenced workpaper was incorrectly allocated to Washington in this filing. This amount will be adjusted in rebuttal testimony.

PREPARER: Shelley McCoy

Boise Data Request 0062

Reference the Company's response to Boise Data Request 0020: Please provide an updated workpaper 8.4 based on updated transfers to plant through December 31, 2015, excluding the referenced removal costs.

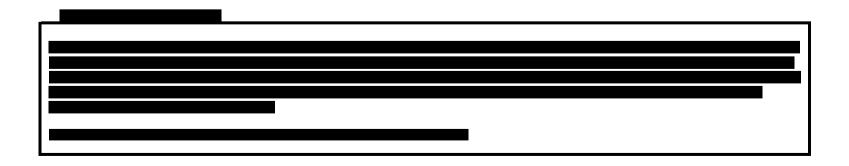
Response to Boise Data Request 0062

Please refer to Confidential Attachment Boise 0062 for an updated workpaper 8.4.

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: Shelley McCoy





Boise Data Request 0069

Reference the Company's response to Boise Data Request 0031: The Company's response is unresponsive. The accelerated depreciation on Jim Bridger and Colstrip are not, as the Company suggests in the response, a post-test period capital addition. Does the Company agree that the use of an average-of-monthly-average ("AMA") rate base assumption, when calculating the impact of accelerated depreciation on Jim Bridger and Colstrip, is inconsistent with its proposal to use end-of-period ("EOP") rate base? If no, please explain.

Response to Boise Data Request 0069

No, the Company does not agree that the use of average-of-monthly-average (AMA) rate base assumption in calculating the impact of accelerated depreciation on Jim Bridger and Colstrip is inconsistent with the proposal to use end-of-period (EOP) historical rate base.

As detailed in the direct testimony of Ms. McCoy, the Company's proposal to use EOP rate base is applied to historical rate base balances, as a means to reduce the regulatory lag inherent in historical test period data. By applying EOP rate base methodology to historical rate base, historical data is walked forward to a more current point in time, thus narrowing the discrepancy between historical balances and the balances during the rate effective period.

On the other hand, pro forma rate base adjustments in this filling are consistently made on an AMA basis to best reflect the average balance that will be in service and serving customers during the rate effective period.

The Company does not agree that its proposal to accelerate depreciation on Jim Bridger and Colstrip plants are "post-test period capital addition[s]." This proposal, however, was made on an AMA basis to maintain consistency with other pro forma rate base adjustments made in this filing.

PREPARER: Shelley McCoy

Boise Data Request 0088

Colstrip 3 O&M. Does the Company agree that, subsequent to the Commission Order in Cause No. U-83-57, it stipulated with Staff in Cause No. U-86-02 to remove from rates <u>all</u> costs associated with Colstrip 3, as well as all revenues associated from the Black Hills Power & Light Company ("Black Hills") power sales agreement? If no, please provide all documents in the Company's possession, including any testimony, briefs and stipulations, from Cause No. U-86-02, where it conclusively demonstrates that the Company was allowed to recover O&M expense associated with Colstrip 3 in Cause No. U-86-02.

Response to Boise Data Request 0088

No. The Company cannot find references in the Order to Cause No. U-86-02 that indicate the removal of all costs associated with Colstrip 3 was stipulated to. Please find a copy of the Order to Cause No. U-86-02 in Attachment Boise 0088-1. In this Order, the Company can find two places where Colstrip 3 adjustments are referenced. In Table II on Page 7 of the attachment, two uncontested adjustments were made with reference to Colstrip 3. The first of these adjustments is the "Colstrip/Black Hills" adjustment. This adjustment was made in order to be consistent with previous Commission findings, as described in the proposed testimony of Company witness Mr. James T. Watson (Line 22, Page 2, through Line 10, Page 3), a copy of which is provided as Attachment Boise 0088-2. Specifically, the "Colstrip/Black Hills" adjustment was made such that "...all utility plant associated with Colstrip Unit 3 and revenues from the Black Hills sale have been removed." (Line 9 - 10, Page 3). Further evidence supporting only the removal of utility plant in the Colstrip 3 removal adjustment can be found in a data response to WUTC Staff in the Company's 1999 general rate case (Docket No, UE-991832). Please find a copy of the referenced data response as Attachment Boise 0088-3. Subpart b of this response includes a copy of the adjustment prepared by WUTC Staff witness Merton Lott in Cause No. U-83-57, which, as detailed in the order of the 1983 Cause, was the basis of the approved Colstrip 3 removal adjustment. As shown in the adjustment prepared by Staff, no operation and maintenance (O&M) expenses were removed as part of this adjustment.

The second reference to Colstrip 3 in Cause U-86-02 is the "Colstrip 3 Disallowance" adjustment. Please see Attachment Boise 0088-4 for a copy of another data response provided to Staff in the Company's 1999 general rate case. Subpart b of this data response explains the substance of this "Colstrip 3 Disallowance" adjustment, which also does not reflect any removal of O&M expenses for Colstrip 3.

The Company reiterates that adjustment 5.2 is made in compliance to Cause No. U-83-57, and have consistently made the same adjustment for all general rate cases since.

PREPARER: Shelley McCoy

Boise Data Request 0091

Transmission Wheeling Revenues: Please provide an explanation for why the Company uses the WRG and WRE factors to allocate wheeling revenues to Washington, rather than some other factor, such as the System Energy ("SE") factor. In the response, please identify specifically where the use of the WRG and WRE factors were approved for use by the Commission for wheeling revenues.

Response to Boise Data Request 0091

Consistent with the West Control Area Inter-Jurisdictional Allocation Methodology (WCA) Manual, "firm wheeling revenues are allocated using the Wheeling Revenue – Generation (WRG) factor. Non-firm wheeling revenues are allocated using the Wheeling Revenue – Energy (WRE) factor." The WRG and WRE factors were included in the WCA manual provided in Docket UE-100749, Docket UE-130043, and Docket UE-140762. These factors were used in the preparation of the wheeling revenue adjustment and approved by the Commission in each of these cases. The WCA manual was provided in response to data request, Boise 0070.

PREPARER: Shelley McCoy

Boise Data Request 0093

Transmission O&M: Does the Company agree that it would be more consistent with the WCA methodology to allocate Transmission O&M expense, as identified in the previous request, using a WRE factor? If no, please explain.

Response to Boise Data Request 0093

No. Consistent with West Control Area inter-jurisdictional allocation methodology (WCA), transmission operation and maintenance (O&M) expenses are allocated on a Control Area Generation East (CAGE) and Control Area Generation West (CAGW) factor when the control area can be clearly identified. Expenses that cannot be clearly allocated to a specific control area are then allocated on a System Generation (SG) factor.

PREPARER: Shelley McCoy

Boise Data Request 0098

Does the Company agree that, as a result of its proposal to accelerate depreciation for the Colstrip and Jim Bridger power facilities, the rate base balances associated with those plants will decline more quickly than under its existing depreciation schedule? If no, please explain.

Response to Boise Data Request 0098

Yes.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

Boise Data Request 0099

Does the Company agree that one of the objectives of its proposal to accelerate depreciation for the Colstrip and Jim Bridger power facilities is to gradually reduce the unrecovered investment or rate base associated with those facilities to reduce the risk to customers associated with an early closure?

Response to Boise Data Request 0099

No. The objective is to provide greater resource planning flexibility to address state and federal environmental policies. See Exhibit No. (RBD-1T), lines 3-5 on page 5.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

Boise Data Request 0100

Does the Company agree that, as a component of a rate plan, it is important that the overall rate base associated with the Colstrip and Jim Bridger facilities be recalculated for the second rate period to reflect additional accelerated depreciation? If no, please explain.

Response to Boise Data Request 0100

No. PacifiCorp's two-year rate plan proposal was limited to a small number of discrete items, specifically major plant investments and cost increases associated with the expiration of production tax credits for renewable resources. PacifiCorp has not proposed to include all anticipated costs during the second year and has agreed to other commitments linked to the two-year rate plan.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

Boise Data Request 0101

Please provide the forecast of Allowance for Deferred Income Taxes (ADIT), depreciation reserve, and rate base for Colstrip and Jim Bridger as of June 1, 2017, and June 1, 2018. Please assume that the Company's proposal to accelerate the life of these facilities is approved. Please also prepare the analysis in a manner similar to, and using a similar level of detail as, the workpapers of Ms. McCoy Page 6.4.

On March 7, 2016, Boise's consultant provided the following correction:

Please provide the forecast of Allowance for Deferred Income Taxes (ADIT), depreciation reserve, and rate base for Colstrip and Jim Bridger as of June **30**, 2017 and June **30**, 2018. Please assume that the Company's proposal to accelerate the life of these facilities is approved. Please also prepare the analysis in a manner similar to, and using a similar level of detail as, the workpapers of Ms. McCoy Page 6.4.

Response to Boise Data Request 0101

Please refer to Attachment Boise 0101-1 and Attachment Boise 0101-2. The adjustment as revised in Attachment Boise 0101-1 would replace Page 6.4 in Ms. McCoy's workpaper in its entirety. This adjustment provides the incremental impacts on rate base, both Accumulated Deferred Income Taxes (ADIT) and depreciation reserves of the proposed accelerated deprecation adjustment (6.4) per Ms. McCoy's Exhibit No. SEM-3, as of June 30, 2017. This adjustment was prepared under the assumption that the rate effective date of the current filing would be July 1, 2016. That being the assumption, the only change to Page 6.4 workpaper of Ms. McCoy required to reflect incremental rate base for balances as of June 30, 2017 is to revise rate base balances from the average-of-monthly-average (AMA) basis, to an end-of-period (EOP) basis at the end of the first effective rate year (July 1, 2016 through June 30, 2017).

Attachment Boise 0101-2 provides the additional incremental impacts on rate base, specifically, Accumulated Deferred Income Taxes (ADIT) of the proposed accelerated deprecation adjustment (6.4) per Ms. McCoy's Exhibit No. SEM-3, between July 1, 2017 to June 30, 2018. Page 6.4 adjustment as revised in Attachment Boise 0101-1 reflects the annual incremental impact of accelerated depreciation. Because straight-line depreciation is assumed, no further incremental adjustment to accumulated depreciation is required to reflect incremental impacts through June 30, 2018. The only incremental impact of accelerated depreciation on rate base between July 1, 2017 and June 30, 2018 would be the change in ADIT. This incremental impact to ADIT is captured in Attachment Boise 0101-2.

Exhibit No. BGM-5C Page 32 of 39

UE-152253 / Pacific Power & Light Company March 15, 2016 Boise 10th Set Data Request 0101

PREPARER: Shelley McCoy

WA UE-152253 Boise 0101

PacifiCorp Austington Expedited Rate Filing - June 2015 Austington Expedited Rate Filing - June 2015 Reveal (in response to Boise a Reveal 9/10 For Assumed Rate Year ending June 30, 2017	- June 2015 ridger and Co squest 0101 30, 2017	olstrip P	lants			PAGE	6.4
	ACCOUNT	Type	TOTAI. COMPANY	FACTOR	FACTOR %	WASHINGTON ALLOCATED	REF#
Adjustment to Expense. Incremental Depreciation Expense	403SP 403SP	PRO -	44,565,903 1,229,742 45,795,644	JBG CAGW	22.4370% 22.5651%	9,999,253 277,492 10,276,745	6,4.1 6,4.1
Adjustment to Rate Base: Incremental Depreciation Reserve	108SP 108SP	PRO PRO	(44,565,903) (1,229,742) (45,795,644)	JBG CAGW	22.4370% 22.5651%	(9,999,253) (277,492) (10,276,745)	6.4.2 6.4.2
Adjustment to Tax:	SCHMAT 41110 282	PRO PRO ON	36,798,561 (12,589,272) 5,731,840	JBG JBG	22.4370% 22.4370% 22.4370%	8,256,495 (2,824,555) 1,286,053	
	SCHMAT 41110 282	PRO PRO PRO	1,087,134 (345,555) 218,235	CAGW CAGW CAGW	22.5651% 22.5651% 22.5651%	245,312 (77,975) 49,245	

Description of Adjustment: This profine adjustment: This profine adjustment records amual incremental depreciation expense and reserve on Jim Bridger Plant and Colstrip Unit 4 assuming depreciations schedule at a carelerated in Washington to match that in Oregon. This change will move the end of the depreciable life for Carefor form 2047 to 2032 and Jim Indeper from 2047 to 2032 and Jim Hodger from 2047 to 2032 and Jim Ho

This adjustment has been modified in response to Boise data request 0101. Incremental reserves and ADIT are revised to reflect EOP incremental balances as of the end of the <u>litet</u> effective rate year. This adjustment replaces Page 6.4 as filed in Ms. McCoy's testimony in its entirety.

Attach Boise 0101-1.xlsx

Page 1 of 2

Jim Bridger - Locatior	<u>1 517000</u>	Colstrip - Location 4	01000 (Unit 4 Only)
	Incremental Impact		Incremental Impact
	Total Company		Total Company
	Accumulated		Accumulated
	Incremental Reserves		Incremental Reserves
7/31/2016	(3,713,825)	7/31/2016	(102,478)
8/31/2016	(7,427,650)	8/31/2016	(204,957)
9/30/2016	(11,141,476)	9/30/2016	(307,435)
10/31/2016	(14,855,301)	10/31/2016	(409,914)
11/30/2016	(18,569,126)	11/30/2016	(512,392)
12/31/2016	(22,282,951)	12/31/2016	(614,871)
1/31/2017	(25,996,776)	1/31/2017	(717,349)
2/28/2017	(29,710,602)	2/28/2017	(819,828)
3/31/2017	(33,424,427)	3/31/2017	(922,306)
4/30/2017	(37,138,252)	4/30/2017	(1,024,785)
5/31/2017	(40,852,077)	5/31/2017	(1,127,263)
6/30/2017	(44,565,903)	6/30/2017	(1,229,742)
7/31/2017	(48,279,728)	7/31/2017	(1,332,220)
8/31/2017	(51,993,553)	8/31/2017	(1,434,698)
9/30/2017	(55,707,378)	9/30/2017	(1,537,177)
10/31/2017	(59,421,203)	10/31/2017	(1,639,655)
11/30/2017	(63,135,029)	11/30/2017	(1,742,134)
12/31/2017	(66,848,854)	12/31/2017	(1,844,612)
1/31/2018	(70,562,679)	1/31/2018	(1,947,091)
2/28/2018	(74,276,504)	2/28/2018	(2,049,569)
3/31/2018	(77,990,329)	3/31/2018	(2,152,048)
4/30/2018	(81,704,155)	4/30/2018	(2,254,526)
5/31/2018	(85,417,980)	5/31/2018	(2,357,005)
6/30/2018	(89,131,805)	6/30/2018	(2,459,483)

PAGE WASHINGTON TOTAL PocifiCom Washington Expedited Rate Filing - June 2015 Accelerated Depreciation on Jim Bridger and Colstrip Plants Fior Acsumed Page Year anding June 30, 2018

6.4

Adjustment to Tax.	ACCOUNT	Type	COMPANY	FACTOR	FACTOR %	ALLOCATED	REF#
Aujustinent to Tax.	SCHMAT	PRO	37,182,507		22.4370%	8,342,641	
	41110	PRO	(12,734,983)		22.4370%	(2,857,349)	
	282	PRO	5,789,675		22.4370%	1,299,030	
	SCHMAT	PRO	1,097,646	CAGW	22.5651%	247,684	
	41110	PRO	(349,544)		22.5651%	(78,875)	
	282	PRO	159,189		22.5651%	35,921	

Description of Adjustment: This proform adjustment This proform adjustment records amual incremental depreciation expense and reserve on Jim Bridger Plant and Colstrip Unit 4 assuming depreciations schedule at Mashington to match that in Creegon. This change will move the end of the depreciable life for Costript from 2047 to 2032 and Jim Bridger from 2037 to 2025, which would result in depreciation rates similar to these based on starem plant lives previously approved in Washington under the 2002 Depreciation Study (WA Docket No. UE-021271, Order dated uny 31, 2020). Information areas are reflected on an average basis.

This adjustment has been prepared in response to Boise data request 0101. Incremental ADIT is walked forward to reflect EOP incremental balances as of the end of the <u>second</u> effective rate year. This adjustment is incremental to the adjustment provided in Attachment Boise 0101-1.

Exhibit No. BGM-5C Page 35 of 39

432 4

UE-152253 / Pacific Power & Light Company February 25, 2016 PC Data Request 15 – 1st Supplemental

PC Data Request 15

Re: Pro Forma Major Plant Additions.

Please refer to page 13 of the Direct Testimony of Rick T. Link, Exhibit No. RTL-1CT. Please provide what the PVRR(d) would be in the select Selective Catalytic Reduction systems on Jim Bridger Units 3 and 4 approach if all assumptions remain unchanged with the exception of reducing the plant lives in the SCR investment scenario from the dates used in the model to 2025.

1st Supplemental Response to PC Data Request 15

The Company continues to object to this request as unduly burdensome and as requiring development of a special study or information not maintained in the ordinary course of business. Without waiving these objections, the Company responds as follows:

Please refer to Confidential 1st Supplemental Attachment PC 15-1 for the requested information. As discussed with Public Counsel, the Company performed the requested analysis assuming the depreciable lives of Jim Bridger Units 3 and 4 are through the end of 2025 in the case where Selective Catalytic Reduction (SCR) equipment is installed and both units continue operating as coal-fired facilities. In performing the requested analysis, the Company assumes that Jim Bridger Units 3 and 4 continue operating beyond the end of 2025. The alternative depreciable life assumption therefore has no impact on resource need, system dispatch, system fuel, and system non-fuel variable operating costs. The alternative depreciable life assumption only affects revenue requirement on incremental capital through 2025. Beyond 2025, the Company assumes that runrate capital is treated as an expense.

Confidential 1st Supplemental Attachment PC 15-1 also includes a scenario in which the depreciable lives of Jim Bridger Units 3 and 4 are through the end of 2025 and the units are converted to natural gas. In this case, revenue requirement on capital is treated as described above for the continued coal-fired case.

Confidential 1st Supplemental Attachment PC 15-1 further summarizes the same analysis on a west control area basis.

The table below contains brief descriptions of the files supporting Confidential 1st Supplemental Attachment PC 15-1:

Attachments	Description
1 st Supp Attach PC 15-1, CONF	Summary, revenue requirement of the capital investments among different scenarios
1 st Supp Attach PC 15-2, CONF	Support revenue requirement calculations, Jim Bridger Units 3 and 4 depreciable life through 2037, SCR scenario

UE-152253 / Pacific Power & Light Company February 25, 2016 PC Data Request 15 – 1st Supplemental

1 st Supp Attach PC 15-3, CONF	Support revenue requirement calculations, Jim Bridger Units 3 and 4 depreciable life through 2037, gas conversion scenario
1 st Supp Attach PC 15-4, CONF	Support revenue requirement calculations, Jim Bridger Units 3 and 4 depreciable life through 2037, gas conversion capital costs
1 st Supp Attach PC 15-5, CONF	Support revenue requirement calculations, Jim Bridger Units 3 and 4 depreciable life through 2025, SCR scenario
1 st Supp Attach PC 15-6, CONF	Support revenue requirement calculations, Jim Bridger Units 3 and 4 depreciable life through 2025, gas conversion scenario
1 st Supp Attach PC 15-7, CONF	Support revenue requirement calculations, Jim Bridger Units 3 and 4 depreciable life through 2025, gas conversion capital costs

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: Hui Shu

SPONSOR: Rick Link

UE-152253 / Pacific Power & Light Company February 5, 2016 PC Data Request 52

PC Data Request 52

Re: Pension Expense.

Since the actuarial assumptions for the 2016 pension plan would have been selected by PacifiCorp at the end of 2015, please provide the following:

- (a) Please provide the actuarial assumptions that were selected in December 2015 for use in the 2016 pension plan year.
- (b) Please provide a full and complete copy of the most recent projections of 2016 pension expense provided by the actuarial firm to the Company. This should include the impact of the actual 2015 plan experience and the actuarial assumptions that were selected for the 2016 plan year in December 2015. With the response, please provide all information provided by the actuarial firm in making the estimates.
- (c) Please provide the pension expense that would result from the actuarial calculations for 2016 on a similar basis to the test pension expense contained on Exhibit No. (SEM-3), page 4.2.2, of \$24,712,488.

Response to PC Data Request 52

- (a) Please refer to Attachment PC 52-1 for a listing of the actuarial assumptions.
- (b) Please refer to Attachment PC 52-2 for a complete copy of the most recent pension actuarial report.
- (c) Please refer to Attachment PC 52-3. The projected pension expense for 2016 on a similar basis to the test pension expense previously provided is calculated in the attachment.

PREPARER: Scott Mills

UE-152253 / Pacific Power & Light Company February 5, 2016 PC Data Request 53

PC Data Request 53

Re: Post-Retirement Benefits Other Than Pensions (OPEB).

Since the actuarial assumptions for the 2016 OPEB plan would have been selected by PacifiCorp at the end of 2015, please provide the following:

- (a) Please provide the actuarial assumptions that were selected in December 2015 for use in the 2016 OPEB plan year.
- (b) Please provide a full and complete copy of the most recent projections of 2016 OPEB expense provided by the actuarial firm to the Company. This should include the impact of the actual 2015 plan experience and the actuarial assumptions that were selected for the 2016 plan year in December 2015. With the response, please provide all information provided by the actuarial firm in making the estimates.
- (c) Please provide the OPEB expense that would result from the actuarial calculations for 2016 on a similar basis to the Test Year Post Retirement expense contained on Exhibit No. (SEM-3), page 4.2.2, of (\$4,043,010).

Response to PC Data Request 53

- (a) Please refer to Attachment PC 53-1 for a listing of the actuarial assumptions.
- (b) Please refer to Attachment PC 53-2 for a complete copy of the most recent pension actuarial report.
- (c) Please refer to Attachment PC 53-3. The projected OPEB expense for 2016 on a similar basis to the test OPEB expense previously provided is calculated in the attachment.

PREPARER: Scott Mills