

Exhibit D

Affidavit of Sarah A. Shifley

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BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON STATE ATTORNEY
GENERAL'S OFFICE AND THE
INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES,

Joint Complainants,

v.

PACIFICORP, d/b/a PACIFIC POWER &
LIGHT CORP.

Respondents.

Docket No. UE-

AFFIDAVIT OF SARAH A. SHIFLEY

STATE OF WASHINGTON)
)
County of KING)

ss.

I, Sarah A. Shifley, being first duly sworn, do say:


- 1. My name is Sarah A. Shifley. I am over the age of 18, a citizen of the United States, and competent to be a witness.
- 2. I am an Assistant Attorney General with the Public Counsel Section of the Washington Attorney General's Office (Public Counsel). In this capacity, I participated in 2009 General Rate Case of Pacific Power and Light, d/b/a PacifiCorp, Docket No. UE-090205 (2009 GRC), and am participating in the current PacifiCorp General Rate Case, Docket No. UE-100749 (2010 GRC).

6. Public Counsel sought in the 2009 GRC settlement to have an accurate level of REC revenues reflected in the rate effective period. This was important to Public

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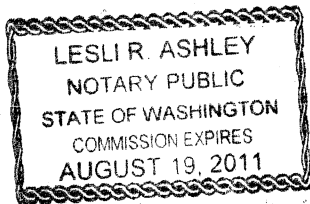
Counsel because its position. and the position of this Commission. is that retail customers are entitled to these revenues. Public Counsel relied on the Company's assertions regarding its anticipated REC revenues.

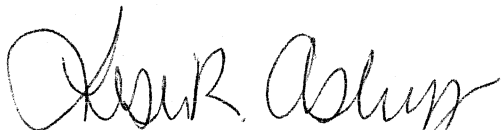
7. Based on the information it was provided, Public Counsel had no basis for believing that PacifiCorp's actual REC 2009 and 2010 revenues would be as high as they actually were. If Public Counsel had been provided complete and accurate information on PacifiCorp's 2009 and 2010 REC revenues during the 2009 GRC, it would not have agreed to the REC terms in the Settlement.



SARAH A. SHIFLEY, WSBA #39394

SUBSCRIBED AND SWORN to before me this 8th day of December, 2010.





Notary Public for Washington
My Commission Expires: 8/19/2011