

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT  
COMPANY, d/b/a PACIFICORP,

Respondent.

DOCKET UE-140762 ET AL.

PUBLIC COUNSEL REQUEST FOR  
LEAVE TO REVISE DIRECT  
TESTIMONY OF DONNA RAMAS  
(EXHIBITS DMR-1CT, DMR-2,  
DMR-3)

1 Pursuant to WAC 480-07-460(1)(b)(ii), Public Counsel respectfully requests leave to file  
the Revised Testimony of Donna M. Ramas (Exhibit DMR-1CT, DMR-2, DMR-3), a copy of  
which is submitted with this motion. Counsel for PacifiCorp has authorized Public Counsel to  
represent that the Company does not oppose the motion.

2 The revisions make substantive changes to Ms. Ramas' testimony based on an update to  
PacifiCorp's actual plant addition data. The revisions are intended to reflect more recent actual  
known and measurable major plant additions, updating her adjustment schedule and the  
testimony accordingly. The updated information was provided by PacifiCorp in response to  
Public Counsel data requests, but was not received by Ms. Ramas until after October 10, 2014,  
when her testimony was filed. The change has a modest impact, slightly increasing Public  
Counsel's revenue requirement recommendation.

3 As required by the rule, the testimony is labeled "Revised" on the cover sheet, with the  
revision date of October 17, 2014. The revised portions of the testimony text are indicated in  
legislative style (redlining). Because each page contains redlining or is affected by changed  
pagination, the headers of all pages are labeled revised and dated.

4 The spreadsheets contained in Exhibit Nos. DMR-2 and DMR-3 have been revised, as described below:

5 Exhibit No. DMR-3, page 6 of 24, incorporates two additional months of actual plant additions placed into service through August 2014, as well as corrected information provided by the Company, as provided in response to Public Counsel Data Request 109. These changes to Exhibit DMR-3, page 6 flow through to the following areas: Washington jurisdictional allocation (page 5), depreciation expense and accumulated depreciation (page 7), accumulated deferred income taxes (page 8), and the synchronization of tax deductible interest expense with rate base and the weighted cost of debt (page 23). Additionally, the corrections and update also flow through to the summary schedules, since rate base and net operating income are impacted by the changes. Thus, Exhibit No. DMR-2, which presents the revenue requirement impacts by adjustment, and Exhibit No. DMR-3 pages 1-4, which consists of summary schedules, are also impacted.

6 For the foregoing reasons, Public Counsel submits that Ms. Ramas' testimony revision is in the public interest, and there is good cause to grant the motion. The revision benefits the record by providing updated and more accurate information regarding PacifiCorp's plant investment. The revisions are being made promptly after receiving new information, in time for review prior to the rebuttal/cross-answering deadline of November 14, 2014. Public Counsel is aware of no prejudice to other parties or the Commission from the request and, therefore, respectfully requests that the motion be granted.

7 Dated this 17<sup>th</sup> day of October, 2014.

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Public Counsel Unit

PUBLIC COUNSEL MOTION FOR  
LEAVE TO REVISE DIRECT  
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