TABLE 3
Production Allocation Factor Comparison

Class	100 Summer Hrs / 100 Winter Hrs	4CP
Sch 16	43.0%	50.6%
Sch 24	13.4%	12.4%
Sch 36	21.4%	19.1%
Sch 48T	8.7%	7.0%
Sch 48T-D.F.	9.6%	7.6%
Sch 40	3.5%	3.3%
Lighting	0.2%	0.1%
Total	100.0%	100.0%

- 1 Q. HAVE YOU MODIFIED THE PACIFICORP ECOS STUDY SO THAT
 2 PRODUCTION-RELATED COSTS ARE ALLOCATED USING YOUR
 3 RECOMMENDED 4 CP RATHER THAN THE 100 SUMMER/100 WINTER
 4 METHOD?
- 5 A. Yes. I have calculated the ECOS study for the recommended 4 CP demand allocation 6 method under both a 100% demand allocation of production capacity costs, and in the 7 context of PacifiCorp's Peak Credit classification (43% demand, 57% energy). For 8 the 100% demand 4 CP allocation, I calculate the ECOS results if the peak credit 9 method for classification is not used at all and, instead, production fixed costs are 10 allocated on the basis of 4 CP demand alone. Disuse of the Peak Credit method 11 altogether will require some modifications to the allocation of production variable 12 costs and transmission costs. I have used a 100% energy allocator for variable production costs, ¹⁴ and a 100% 12 CP allocator for transmission costs. This treatment 13 14 of transmission costs will be discussed further in the next section. The results of this

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The FERC accounts that I have considered variable production are 501, 501NPC, 503, 518, 547NPC and 555 (in part).