

# STAFF CROSS-EXHIBIT LIST

Docket UE-100749

NUMBER	WITNESS	A/R	DATE	DESCRIPTION
	GREGORY N. DUVALL			PacifiCorp Response to ICNU Data Request No. 1.33 (5 pages) CONFIDENTIAL ATTACHMENT
				PacifiCorp Response to ICNU Data Request No. 9.7 (1 page) CONFIDENTIAL ATTACHMENT
				PacifiCorp Response to ICNU Data Request No. 26.29 (1 page)
				PacifiCorp Response to ICNU Data Request No. 26.31 (1 page)
				PacifiCorp Response to ICNU Data Request No. 26.36 (1 page)
				PacifiCorp Response to ICNU Data Request No. 26.37 (1 page)
				PacifiCorp Response to ICNU Data Request No. 26.70 (1 page)
				PacifiCorp Response to ICNU Data Request No. 26.85 (1 page)
				PacifiCorp Response to ICNU Data Request No. 26.86 (1 page)
				PacifiCorp Response to ICNU Data Request No. 26.88 (1 page)
				PacifiCorp Response to ICNU Data Request No. 26.90 (1 page)

**ICNU Data Request 1.33**

For each of the Firm Transmission contracts whose costs are included in GRID, please identify the purpose of the transaction, why it is used and useful in the Test Year, the amount of capacity or type of transmission service it provides, and where the capacity or service provided by this contract is modeled in GRID.

**Response to ICNU Data Request 1.33**

Please refer to Confidential Attachment ICNU 1.33. The second tab in the attachment is considered non-public information and cannot be shared with PacifiCorp marketing affiliate employees. This information is confidential and is provided subject to the terms and conditions of the protective order in this proceeding

PREPARER: Hui Shu / Jim Portouw / Ken Houston

SPONSOR: Gregory N. Duvall

ATTACHMENT IS  
CONFIDENTIAL  
PER  
PROTECTIVE ORDER

UE-100749/PacifiCorp  
September 1, 2010  
ICNU Data Request 9.7

**ICNU Data Request 9.7**

Please refer to Attachment ICNU 1.33 Confidential, tab "Conf". Please refer to cell C33. It appears that this link is used (in part) to provide reserves to PACE. Please explain whether the associated costs are included in the WCA GRID model, and if so please explain why.

**Response to ICNU Data Request 9.7**

Please refer to Confidential Attachment ICNU 9.7. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: Hui Shu

SPONSOR: Gregory N. Duvall

ATTACHMENT IS  
CONFIDENTIAL  
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**ICNU Data Request 26.29**

Please refer to GND-5T, page 18, lines 8-9 (Chehalis reserves.) Previously the Company has stated that Chehalis and Current Creek use similar technology. Please explain why it is possible to install AGC on Currant Creek but not on Chehalis.

**Response to ICNU Data Request 26.29**

It is technically possible to install AGC at the Chehalis plant.

PREPARER: Ian Andrews

SPONSOR: Gregory N. Duvall

**ICNU Data Request 26.31**

Please refer to GND-5T, page 18, lines 8-9 (Chehalis reserves.) How long would it take the Company to install AGC on Chehalis? Does the Company have any current plan to install AGC on Chehalis? If so, please provide the details.

**Response to ICNU Data Request 26.31**

Based on a discussion with Bonneville Power Administration in early 2009, installing AGC on Chehalis could take up to two years.

As explained in the Company's response to ICNU Data Request 26.37, because of impediments imposed by BPA, the Company does not currently plan to install AGC at Chehalis.

PREPARER: Mark A. Miller

SPONSOR: Gregory N. Duvall

**ICNU Data Request 26.36**

Please refer to GND-5T, page 18, lines 8-9 (Chehalis reserves.) Is it the Company's position that it would be impossible or uneconomic to install AGC on Chehalis? If so, please provide supporting documents, and explain why.

**Response to ICNU Data Request 26.36**

Please refer to the Company's responses to ICNU Data Requests 26.29 and 26.37.

PREPARER: Ian Andrews

SPONSOR: Gregory N. Duvall



**ICNU Data Request 26.37**

Please refer to GND-5T, page 18, lines 8-9 (Chehalis reserves.) Please provide a cost benefit analysis analyzing the economics of installing AGC on Chehalis.

**Response to ICNU Data Request 26.37**

The Company does not have a cost benefit analysis of installing AGC at Chehalis because this investment would be warranted only if the Company was able to carry reserves at Chehalis. While PacifiCorp planned to carry reserves at Chehalis at the time of its acquisition of the plant (and initially modeled the plant in net power costs consistently with this expectation), this plan changed because of various technical and operational requirements imposed by BPA.

Initially, the Company reviewed carrying reserves by moving Chehalis from the Bonneville Power Administration (BPA) balancing authority area to the PacifiCorp West balancing authority area. To accomplish this move, BPA required that PacifiCorp participate more broadly in BPA's Remedial Action Scheme (RAS) to address reliability issues on BPA's system. Under the RAS, if Chehalis was moved and BPA had a transmission problem in its balancing authority area, BPA would require the Company to suspend all AGC in the PacifiCorp West balancing authority area. This condition was unacceptable to PacifiCorp for operational/reliability reasons.

Next, the Company explored with BPA whether the Company could carry reserves at Chehalis using dynamic scheduling. As indicated in the Rebuttal Testimony of Gregory Duvall, BPA rejected this proposal on April 30, 2010, just days before this case was filed.

PREPARER: Gregory N. Duvall

SPONSOR: Gregory N. Duvall

**ICNU Data Request 26.70**

Please refer to GND-5T, page 31, lines 16-20. Has the Company quantified the level of arbitrage margins currently included in GRID? If so, please provide a copy of the analysis.

**Response to ICNU Data Request 26.70**

No.

PREPARER: Hui Shu

SPONSOR: Gregory N. Duvall

**ICNU Data Request 26.85**

Please refer to GND-5T, page 41, lines 11-17. Please provide any economic analyses performed by the Company in its decision process to retain the 200 MW referenced in this passage.

**Response to ICNU Data Request 26.85**

The question implies that the Company made a decision to retain the DC Intertie agreement in 2002. This is an incorrect interpretation of the testimony. The requested economic analysis was not performed at such time by the Company. The economic analysis of the DC Intertie term would have been completed prior to the time the contract was executed in 1994 (over 16 years ago) based on the information that was known at the time the contract was executed. The Company has searched its records and has not found the economic evaluation associated with the acquisition of the 200 MW DC Intertie rights.

PREPARER: Hui Shu

SPONSOR: Gregory N. Duvall

**ICNU Data Request 26.86**

Please refer to GND-5T, page 41, lines 11-17. Please provide any evidence available to the Company demonstrating the Company's decision to obtain the 200 MW of power from SCE was reasonable and prudent.

**Response to ICNU Data Request 26.86**

Please refer to the Company's response to ICNU Data Request 26.85.

PREPARER: Jim Portouw

SPONSOR: Gregory N. Duvall

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December 6, 2010  
ICNU Data Request 26.88

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**ICNU Data Request 26.88**

Please refer to GND-5T, page 42, lines 13-15. Please provide any documents supporting the comparison of costs and benefits cited in this passage.

**Response to ICNU Data Request 26.88**

There are no documents comparing DC Intertie agreement costs and the Company's overall transmission strategy and hedge against changes in the market.

PREPARER: Jim Portouw

SPONSOR: Gregory N. Duvall

**ICNU Data Request 26.90**

Please refer to GND-5T, page 44, lines 17-20. Does the Company believe that it would be improper or unreasonable for it to charge wholesale customers the cost of providing wind integration services?

**Response to ICNU Data Request 26.90**

Yes. The Company has no right to charge wholesale customers the cost of providing wind integration services under its FERC approved OATT.

PREPARER: Hui Shu

SPONSOR: Gregory N. Duvall