



201 South Main, Suite 2300
Salt Lake City, Utah 84111

June 27, 2011

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East, 300 South
Salt Lake City, UT 84114

Attention: Julie P. Orchard
Commission Secretary

**RE: Docket No. 02-035-04 – Agreement Pertaining to PacifiCorp’s September 15, 2010,
Application for Approval of Amendments to Revised Protocol Allocation
Methodology**

Enclosed for filing in the above captioned matter, please find the original and five (5) copies of the Agreement Pertaining to PacifiCorp’s September 15, 2010, Application for Approval of Amendments to Revised Protocol Allocation Methodology entered into by PacifiCorp, the Utah Division of Public Utilities, the Utah Office of Consumer Services, and the Utah Association of Energy Users.

Please contact Daniel Solander at (801) 220-4014 if you have any questions or if I can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey Larsen" followed by a vertical line and the initials "SAC".
Jeffrey K. Larsen
Vice President, Regulation

Enclosures

cc: Service List in Docket No. 02-035-04

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing document to be served upon the following by electronic mail or US mail, postage prepaid, to the addresses shown below on June 27, 2011.

Michael Ginsberg
Patricia Schmid
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84111
mginsberg@utah.gov
pschmid@utah.gov

Paul Proctor
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84111
pproctor@utah.gov

Cheryl Murray
Michele Beck
Dan Gimble
Utah Office of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
cmurray@utah.gov
mbeck@utah.gov
dgimble@utah.gov

William Powell
Philip Powlick
Division of Public Utilities
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
wpowell@utah.gov
philippowlick@utah.gov

Gary Dodge
Hatch James & Dodge
10 West Broadway, Suite 400
Salt Lake City UT 84101
gdodge@hjdllaw.com

Kevin Higgins
Neal Townsend
Energy Strategies
39 Market Street, Suite 200
Salt Lake City, UT 84101
khiggins@energystrat.com
ntownsend@energystrat.com

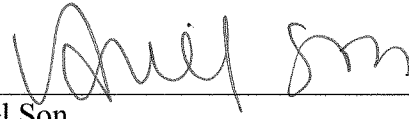
Jeff Fox
Crossroads Urban Center
149 Windsor Street
Salt Lake City, UT 84102

Betsy Wolf
Salt Lake Community Action Program
764 South 200 West
Salt Lake City, Utah 84101
bwolf@slcap.org

Michael Siler
AARP
6975 Union Park Center, #320
Midvale, Utah 84047

Peter J. Mattheis
Eric J. Lacey
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007
pjm@bbrslaw.com
elacey@bbrslaw.com

Gerald H. Kinghorn
Jeremy R. Cook
Parsons Kinghorn Harris, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
ghk@pkhlawyers.com
jrc@pkhlawyers.com

A handwritten signature in black ink, appearing to read "Ariel Son", written over a horizontal line.

Ariel Son
Coordinator, Regulatory Operations

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of PacifiCorp for an Investigation of Inter-Jurisdictional Issues	Docket No. 02-035-04 AGREEMENT PERTAINING TO PACIFICORP'S SEPTEMBER 15, 2010 APPLICATION FOR APPROVAL OF AMENDMENTS TO REVISED PROTOCOL ALLOCATION METHODOLOGY
--	--

This Agreement, dated June 22, 2011, has been negotiated, drafted and signed for the purpose of resolving PacifiCorp's September 15, 2010 Application for Approval of Amendments to Revised Protocol Allocation Methodology (2010 Protocol). The following are parties to this proceeding: Rocky Mountain Power (PacifiCorp or Company), the Utah Division of Public Utilities (Division), the Utah Office of Consumer Services (Office), the Utah Association of Energy Users, the Utah Industrial Energy Consumers, and Nucor Steel – Utah, a division of Nucor Corporation. The following are the parties who are signing this Agreement (individually, a "Party" and collectively, the "Parties"): PacifiCorp, the Division, the Office, and the Utah Association of Energy Users.

1. PacifiCorp's Application requests amendments to the inter-jurisdictional allocation methodology approved by the Commission in its December 14, 2004 order in this docket. In that order, the Commission approved a Stipulation that utilized both the "Revised Protocol" and the "Rolled-In" inter-jurisdictional allocation methodologies, in

conjunction with certain rate mitigation measures. The Commission further found “that the principle-based, Rolled-In allocation method and current cost causation, previously approved by this Commission, remains a valid benchmark to judge the reasonableness of future rates in Utah...” and noted that the Rolled-In allocation methodology has been consistently used in Utah since its adoption in 1997.

2. In this Application, PacifiCorp proposes that, for the duration of the 2010 Protocol, a fixed dollar amount per year adjustment would be applied to Utah’s revenue requirement under the Rolled-In allocation methodology as set forth in the 2010 Protocol. The adjustment is composed of two parts associated with the Regional Resources category (as defined in the 2010 Protocol), namely: the Hydro Endowment, comprised of the Owned Hydro Embedded Cost Differential Adjustment and the Mid-Columbia Contract Embedded Cost Differential Adjustment, and a situs adjustment associated with the reallocation of the surcharge imposed under the Klamath Hydroelectric Settlement Agreement (KHSA) to Oregon and California with a corresponding credit to the other states. The proposed adjustment for Utah is approximately (\$1.0) million per year for the duration of the 2010 Protocol.

3. In this Application, PacifiCorp also acknowledges that state regulatory commissions are obligated to establish just and reasonable rates under a state’s regulatory law and public policy. Accordingly, the 2010 Protocol explicitly acknowledges that “Nothing in the 2010 Protocol shall abridge any State’s right and/or obligation to establish fair, just and reasonable rates based upon the law of the State and the record established in rate proceedings conducted by that State.”

4. The KHSA is a voluntary settlement entered into by the Company, the United States Department of the Interior, the states of Oregon and California, and other parties representing tribal, fishing and agricultural interests. The KHSA and PacifiCorp's rights and liabilities under the KHSA are described in Oregon Public Utility Commission Order No. 10-364 entered September 16, 2010, Docket UE 219, in the matter of PacifiCorp, dba Pacific Power Application to Implement the Provisions of Senate Bill 76, and in California Public Utilities Commission's Order dated May 6, 2011 in Application 10-03-015. These Orders authorize PacifiCorp to collect, in Oregon and California rates, a surcharge to fund hydroelectric dam and related facility removal as provided by the KHSA.

5. In Docket No. 10-035-124, PacifiCorp filed its general rate case showing results under the Revised Protocol and Rolled-In inter-jurisdictional allocation methodologies. Under the Rolled-In inter-jurisdictional allocation methodology, PacifiCorp has allocated all fixed costs of generation and transmission resources using the System Generation (SG) factor, including fixed costs related to the Klamath facilities. PacifiCorp has also proposed certain ratemaking adjustments related to the Klamath facility (Klamath Rate Impacts). The Klamath Rate Impacts include:

- a. Accelerated depreciation of plant balances related to existing investment in the Klamath facilities;
- b. Inclusion in rate base of relicensing and settlement process costs;
- c. Inclusion in rate base of additional capital costs associated with interim measure requirements of the KHSA; and
- d. Collection in rates of a dam removal surcharge.

These rate adjustments are described and itemized in the direct testimony and exhibits of Dean S. Brockbank, and Steven R. McDougal. See Docket No. 10-035-124, Direct Testimony of Dean S. Brockbank and Confidential Exhibits RMP____(DSB-3) and (DSB-4), and Docket No. 10-035-124, Direct Testimony of Steven R. McDougal and Exhibit RMP____(SRM-3), Tab 8.

6. Certain parties dispute some of PacifiCorp's proposals in this docket and Docket No. 10-035-124 upon legal and factual grounds, including that PacifiCorp's action in connection with the Klamath Hydro Facilities and the KHSA may be imprudent. Some parties contend that a Rolled-In inter-jurisdictional allocation methodology should be used in Utah. Some parties challenge the inclusion in Utah rates of any costs associated with the KHSA, included but not limited to the previously described Klamath Rate Impacts, at any time or under any inter-jurisdictional allocation method, and claim that the Commission does not have the jurisdictional authority to require the same, and that any such requirement would be unlawful.

7. Without compromising, settling or resolving any of the factual or legal disputes identified above, and while agreeing that the Commission may authorize the use of the 2010 Protocol, the Parties acknowledge and affirm that:

- a. The Parties agree that the Rolled-In allocation methodology, as explained and illustrated in Exhibits A and B to this Agreement, or as hereafter modified by the Commission, remains the benchmark and starting point for allocating inter-jurisdictional costs to Utah for ratemaking purposes, and will continue to be so, absent contrary Commission Order.

b. The Parties agree that the combined effect of the two adjustments described in paragraph 2 above is designed to insulate Utah customers from the expected financial impacts of the Klamath Rate Impacts, if Utah rates are set using the 2010 Protocol. The 2010 Protocol and Rolled-In allocation methodologies both produce substantially equivalent economic impacts on Utah customers if Utah is allocated an SG share of all Klamath Rate Impacts under the Rolled-In allocation methodology. However, certain parties dispute, and this Agreement does not resolve, whether, under the Rolled-In inter-jurisdictional methodology, any such Klamath Rate Impacts should be borne by Utah customers.

8. Under the facts and circumstances described above, the Parties signing this Agreement request that the Commission issue an order pursuant to Utah Code Ann. § 54-4-1, approving for use in Utah, other than as specified herein, the terms and conditions of the 2010 Protocol as reflected in Exhibit RMP ____ (ALK-1) attached to the Direct Testimony of Andrea L. Kelly filed in this docket in September 2010, including Appendices A to F, as corrected by the Errata Sheet to Exhibit RMP ____ (ALK-1) filed with the Commission on or about March 2, 2011, and as further described in detail in Exhibits A and B to this Agreement. Such use of the 2010 Protocol shall begin with Docket No. 10-035-124 and remain in effect for all Company filings made on or before December 31, 2016.

9. The Parties request that the order provide that, for purposes of any such use of the 2010 Protocol, the Hydro Endowment and Klamath adjustments described above will be deemed to net to zero for ratemaking purposes in Utah.

10. The Parties further request that the order provide that the Rolled-In allocation methodology, as explained and illustrated in Exhibits A and B to this Agreement, or as hereafter modified by the Commission, will continue to be the benchmark and starting point for allocating inter-jurisdictional costs to Utah for ratemaking purposes. Unless and until the Commission directs to the contrary, all Company filings in Utah ratemaking proceedings will be based on the Rolled-In allocation methodology, and will include calculations showing the 2010 Protocol results, including the Hydro Endowment and Klamath adjustments. There is no agreement among the Parties regarding the inter-jurisdictional allocation methodology that should be used in Utah after the term of the 2010 Protocol expires. In addition, for Docket No. 10-035-124, PacifiCorp shall produce a new jurisdictional allocation model (JAM) reflecting this Agreement.

11. The Parties expressly reserve and shall not be deemed to have waived, compromised or limited, any rights, defenses, remedies, duties, or jurisdictional objections available under Federal or Utah law in connection with the inclusion, timing or allocation to Utah of costs related to the Klamath facilities, included but not limited to the previously described Klamath Rate Impacts, in Docket No. 10-035-124, and/or in any other or future proceeding. As the Commission finally resolves issues relating to the Klamath Rate Impacts for Utah ratemaking purposes, the Company shall reflect such resolutions in future filings. The Parties recognize and agree that any Commission

disallowance of costs related to the Klamath Rate Impacts shall result in adjustments to the calculation of rates under both Rolled-In and 2010 Protocol.

12. The Parties acknowledge that the emerging issues related to the inter-state allocation of Class 1 demand-side management (DSM) programs are not addressed in this Agreement and should not be considered in this phase of the proceeding. Additional analysis and discussion of these issues may be undertaken in the Standing Committee workgroups and the Parties understand that the Company may make a subsequent Application to modify the allocation of some or all Class 1 DSM resources.

13. The Parties request that the order provide that PacifiCorp will file its semi-annual results of operations using the Rolled-In allocation methodology, and the calculation of the 2010 Protocol Hydro Endowment and Klamath Surcharge adjustments using test period data in sufficient detail to allow the Parties to compare the two methodologies for the six-year effective period of the 2010 Protocol. This will apply to the first report filed after this Agreement has been approved by the Commission.

14. The Parties have entered into this Agreement to avoid further expense, inconvenience, uncertainty and delay. Nothing in this Agreement, or testimony, presentation or briefing in connection with this Agreement, shall be asserted or deemed to mean that a Party agreed with or adopted another party's legal or factual assertions in this proceeding.

15. Any Party may request that the Commission rescind, alter, or amend its order entered in connection with this Agreement or the 2010 Protocol if the Party concludes that the Agreement no longer produces results that are just, fair, reasonable, or in the public interest, due to unforeseen or changed circumstances. The terms of this

Agreement shall not impact any Parties' existing commitments to participate in the Standing Committee workgroups.

16. The Parties each agree to file testimony of one or more witnesses providing evidence in support of the Party's analysis and evaluation that led to this Agreement. As applied to the Division and Office, the evidence shall be such as the Division and Office deem in their sole discretion to be consistent with their statutory authority and responsibility.

17. All negotiations related to this Agreement are confidential and no Party shall be bound by any position asserted in negotiations. Neither the execution of this Agreement nor the order adopting this Agreement shall be deemed to constitute an admission or acknowledgment by any Party of any liability, the validity or invalidity of any claim or defense, the validity or invalidity of any principle or practice, or the basis of an estoppel or waiver by any Party other than with respect to issues resolved by this Agreement; nor shall negotiation positions of any Party relating to this Agreement or statements or documents made in the negotiation process be introduced or used as evidence for any other purpose in a future proceeding by any Party except a proceeding to enforce the approval or terms of this Agreement.

18. The Parties agree that no part of this Agreement, or any Commission Order acknowledging, adopting, approving or responding to the same, shall in any manner be argued or considered by any Party hereto as binding or as precedent in any Utah rate setting context or case with respect to interclass allocations. Every Party to this Agreement hereby agrees not to claim or argue that execution or approval of this Agreement or adoption or use of the Rolled-In inter-jurisdictional allocation methodology

in Utah requires or establishes a presumption in favor of any particular Utah interclass allocation methodology, practice or policy, or any changes to current Utah interclass allocation methodologies, policies or practices.

19. The Parties agree that if any person challenges the approval of this Agreement or requests rehearing or reconsideration of any order of the Commission approving this Agreement, each Party will use its best efforts to support the terms and conditions of the Agreement. As applied to the Division and Office, the phrase “use its best efforts” means that they shall do so in a manner consistent with their statutory authority and responsibility. In the event any person seeks judicial review of a Commission order approving this Agreement, parties other than the Division and Office shall take no position in that judicial review opposed to the Agreement, and the Division and Office shall take such positions as are consistent with their statutory authority and responsibility.

20. Except with regard to the obligations of the Parties under the two immediately preceding paragraphs of this Agreement, this Agreement shall not be final and binding on the Parties until it has been approved without material change or condition by the Commission. This Agreement is an integrated whole, and any Party may withdraw from it if it is not approved without material change or condition by the Commission or if the Commission’s approval is rejected or materially conditioned by a reviewing court. If the Commission rejects any part of this Agreement or imposes any material change or condition on approval of this Agreement or if the Commission’s approval of this Agreement is rejected or materially conditioned by a reviewing court, the Parties agree to meet and discuss the applicable Commission or court order within five

business days of its issuance and to attempt in good faith to determine if they are willing to modify the Agreement consistent with the order. No Party shall withdraw from the Agreement prior to complying with the foregoing sentence. If any Party withdraws from the Agreement, any Party retains the right to seek additional procedures before the Commission, including cross-examination of witnesses, with respect to issues addressed by the Agreement and no Party shall be bound or prejudiced by the terms and conditions of the Agreement.

21. The Parties may execute this Agreement in counterparts each of which is deemed an original and all of which only constitute one original.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed by their duly authorized representatives as of the date first herein written.

ROCKY MOUNTAIN POWER:

By: Mark C. Moench

Date: 6/23/11

Mark C. Moench
Senior Vice President & General Counsel

DIVISION OF PUBLIC UTILITIES:

By: _____

Date: _____

Patricia Schmid
Assistant Attorney General

business days of its issuance and to attempt in good faith to determine if they are willing to modify the Agreement consistent with the order. No Party shall withdraw from the Agreement prior to complying with the foregoing sentence. If any Party withdraws from the Agreement, any Party retains the right to seek additional procedures before the Commission, including cross-examination of witnesses, with respect to issues addressed by the Agreement and no Party shall be bound or prejudiced by the terms and conditions of the Agreement.

21. The Parties may execute this Agreement in counterparts each of which is deemed an original and all of which only constitute one original.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed by their duly authorized representatives as of the date first herein written.

ROCKY MOUNTAIN POWER:

By: _____

Date: _____

Mark C. Moench
Senior Vice President & General Counsel

DIVISION OF PUBLIC UTILITIES:

By: Patricia E. Schmid

Date: 6/23/2011

Patricia Schmid
Assistant Attorney General

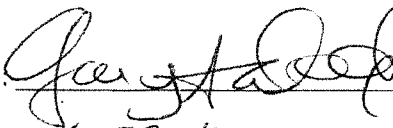
OFFICE OF CONSUMER SERVICES:

By : _____

Date : _____

Paul Proctor
Assistant Attorney General

UTAH ASSOCIATION OF ENERGY USERS

By :  _____

Date : 6-23-11

Gary A. Dodge
Attorney

OFFICE OF CONSUMER SERVICES:

By : Paul H Proctor

Date : June 27, 2011
Paul Proctor
Assistant Attorney General

UTAH ASSOCIATION OF ENERGY USERS

By : _____

Date : _____
Gary A. Dodge
Attorney

EXHIBIT A

**TO THE AGREEMENT PERTAINING TO PACIFICORP'S SEPTEMBER 15, 2010
APPLICATION FOR APPROVAL OF AMENDMENTS TO REVISED PROTOCOL
ALLOCATION METHODOLOGY**

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original		Current Definition	
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		<u>Allocation Factor</u>			
Sales to Ultimate Customers					
440	Residential Sales Direct assigned - Jurisdiction	S	S	S	S
442	Commercial & Industrial Sales Direct assigned - Jurisdiction	S	S	S	S
444	Public Street & Highway Lighting Direct assigned - Jurisdiction	S	S	S	S
445	Other Sales to Public Authority Direct assigned - Jurisdiction	S	S	S	S
448	Interdepartmental Direct assigned - Jurisdiction	S	S	S	S
447	Sales for Resale Direct assigned - Jurisdiction Non-Firm Firm	S SE SG	S SE SG	S SE SG	S SE SG
449	Provision for Rate Refund Direct assigned - Jurisdiction	S SG	S SG	S SG	S SG
Other Electric Operating Revenues					
450	Forfeited Discounts & Interest Direct assigned - Jurisdiction	S	S	S	S
451	Misc Electric Revenue Direct assigned - Jurisdiction Other - Common	S SO	S SO	S SO	S SO
453	Water Sales Common	N/A	SG	SG	SG
454	Rent of Electric Property Direct assigned - Jurisdiction Common Other - Common	S SG N/A	S SG SO	S SG SO	S SG SO
456	Other Electric Revenue Direct assigned - Jurisdiction Wheeling Non-firm, Other Common Wheeling - Firm, Other Customer Related	S SE SO SG N/A	S SE SO SG CN	S SE SO SG CN	S SE SO SG CN
Miscellaneous Revenues					
41160	Gain on Sale of Utility Plant - CR Direct assigned - Jurisdiction Production, Transmission General Office	S SG SO	S SG SO	S SG SO	S SG SO
41170	Loss on Sale of Utility Plant				

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original		Current Definition	
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General Office	SO	SO	SO	SO
4118	Gain from Emission Allowances				
	SO2 Emission Allowance sales	SE	SE	SE	SE
41181	Gain from Disposition of NOX Credits				
	NOX Emission Allowance sales	SE	SE	SE	SE
421	(Gain) / Loss on Sale of Utility Plant				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General Office	SO	SO	SO	SO
	Customer Related	N/A	CN	CN	CN
Miscellaneous Expenses					
4311	Interest on Customer Deposits				
	Customer Service Deposits	CN	CN	CN	CN
	Direct assigned - Jurisdiction	N/A	S	S	S
Steam Power Generation					
500, 502, 504-514	Operation Supervision & Engineering				
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
501	Fuel Related				
	Steam Plants	SE	SE	SE	SE
	Peaking Plants*	SSECT	SSECT	N/A	N/A
	Cholla*	SSECH	SSECH	N/A	N/A
503	Steam From Other Sources				
	Steam Royalties	SE	SE	SE	SE
Nuclear Power Generation					
517 - 532	Nuclear Power O&M				
	Nuclear Plants	SG	SG	SG	SG
Hydraulic Power Generation					
535 - 545	Hydro O&M				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
Other Power Generation					
546, 548-554	Operation Super & Engineering				
	Other Production Plant	SG	SG	SG	SG
	Peaking Plants*	N/A	SSGCT	N/A	N/A
547	Fuel				
	Other Fuel Expense	SE	SE	SE	SE
	Peaking Plants*	N/A	SSECT	N/A	N/A
Other Power Supply					
555	Purchased Power				

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original		Current Definition	
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
	Direct assigned - Jurisdiction Firm	S	S	S	S
	Non-firm	SE	SE	SE	SE
	100 MW Hydro Extension	SG	N/A	N/A	N/A
	Seasonal Contracts	SSGC	SSGC	N/A	N/A
556	System Control & Load Dispatch				
	Other Expenses	SG	SG	SG	SG
557	Other Expenses				
	Direct assigned - Jurisdiction	N/A	S	S	S
	Other Expenses	SG	SG	SG	SG
	Cholla Transaction	N/A	SGCT	SGCT	SGCT
	Klamath Dam Removal Surcharge	N/A	S	SG	SG
	Embedded Cost Differential Endowments				
	Company Owned Hydro ECD (Hydro less All Other)	DGP	DGP	N/A	N/A
	Company Owned Hydro ECD (All Other less Hydro)	SG	SG	N/A	N/A
	Mid-Columbia Contract ECD (Mid C less All Other)	MC	MC	N/A	N/A
	Mid-Columbia Contract ECD (All Other less Mid C)	SG	SG	N/A	N/A
	Existing QF Contracts ECD (QF less- All Other)	S	S	N/A	N/A
	Existing QF Contracts ECD (All Other less QF)	SG	SG	N/A	N/A
	Fixed-Levelized 2010 Protocol Adjustments				
	Hydro Endowment	N/A	N/A	S	N/A
	Klamath Dam Removal Surcharge Re-allocation	N/A	N/A	S	N/A
	Non-Levelized 2010 Protocol Embedded Cost Differential and Adjustment				
	Company Owned Hydro ECD (Hydro less Pre-2005 All Other)	N/A	N/A	DGP	N/A
	Company Owned Hydro ECD (Pre-2005 All Other less Hydro)	N/A	N/A	SG	N/A
	Mid-Columbia Contract ECD (Mid C less Pre-2005 All Other)	N/A	N/A	MC	N/A
	Mid-Columbia Contract ECD (Pre-2005 All Other less Mid C)	N/A	N/A	SG	N/A
	Klamath Dam Removal Surcharge Re-allocation	N/A	N/A	S	N/A
TRANSMISSION EXPENSE					
560-564, 566-573	Transmission O&M				
	Transmission Plant	SG	SG	SG	SG
565	Transmission of Electricity by Others				
	Firm Wheeling	SG	SG	SG	SG
	Non-Firm Wheeling	SE	SE	SE	SE
DISTRIBUTION EXPENSE					
580 - 598	Distribution O&M				
	Direct assigned - Jurisdiction	S	S	S	S
	Other Distribution	SNPD	SNPD	SNPD	SNPD
CUSTOMER ACCOUNTS EXPENSE					
901 - 905	Customer Accounts O&M				
	Direct assigned - Jurisdiction	S	S	S	S
	Total System Customer Related	CN	CN	CN	CN
CUSTOMER SERVICE EXPENSE					
907 - 910	Customer Service O&M				
	Direct assigned - Jurisdiction	S	S	S	S

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original		Current Definition	
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
	Total System Customer Related	CN	CN	CN	CN
SALES EXPENSE					
911 - 916	Sales Expense O&M				
	Direct assigned - Jurisdiction	S	S	S	S
	Total System Customer Related	CN	CN	CN	CN
ADMINISTRATIVE & GEN EXPENSE					
920-935	Administrative & General Expense				
	Direct assigned - Jurisdiction	S	S	S	S
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	FERC Regulatory Expense	SG	SG	SG	SG
DEPRECIATION EXPENSE					
403SP	Steam Depreciation				
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
403NP	Nuclear Depreciation				
	Nuclear Plant	SG	SG	SG	SG
403HP	Hydro Depreciation				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
403OP	Other Production Depreciation				
	Other Production Plant	SG	SG	SG	SG
	Peaking Plants*	N/A	SSGCT	N/A	N/A
403TP	Transmission Depreciation				
	Transmission Plant	SG	SG	SG	SG
403	Distribution Depreciation Direct assigned - Jurisdiction				
	Land & Land Rights	S	S	S	S
	Structures	S	S	S	S
	Station Equipment	S	S	S	S
	Storage Battery Equipment	N/A	S	S	S
	Poles & Towers	S	S	S	S
	OH Conductors	S	S	S	S
	UG Conduit	S	S	S	S
	UG Conductor	S	S	S	S
	Line Trans	S	S	S	S
	Services	S	S	S	S
	Meters	S	S	S	S
	Inst Cust Prem	S	S	S	S
	Leased Property	S	S	S	S
	Street Lighting	S	S	S	S

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original		Current Definition	
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
403GP	General Depreciation				
	Distribution	S	S	S	S
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Mining	N/A	SE	SE	SE
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General SO	SO	SO	SO	SO
403MP	Mining Depreciation				
	Remaining Mining Plant	SE	SE	SE	SE
AMORTIZATION EXPENSE					
404GP	Amort of LT Plant - Capital Lease Gen				
	Direct assigned - Jurisdiction	S	S	S	S
	General	SO	SO	SO	SO
	Customer Related	CN	CN	CN	CN
404SP	Amort of LT Plant - Cap Lease Steam				
	Steam Production Plant	SG	SG	SG	SG
404IP	Amort of LT Plant - Intangible Plant				
	Distribution	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General	SO	SO	SO	SO
	Mining Plant	SE	SE	SE	SE
	Customer Related	CN	CN	CN	CN
	Cholla*	N/A	SSGCH	N/A	N/A
404MP	Amort of LT Plant - Mining Plant				
	Mining Plant	SE	SE	SE	SE
404HP	Amortization of Other Electric Plant				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
405	Amortization of Other Electric Plant				
	Direct assigned - Jurisdiction	S	S	S	S
406	Amortization of Plant Acquisition Adj				
	Direct assigned - Jurisdiction	S	S	S	S
	Production Plant	SG	SG	SG	SG
407	Amort of Prop Losses, Unrec Plant, etc				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Trojan	TROJP	TROJP	TROJP	TROJP

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		Allocation Factor			
Taxes Other Than Income					
408	Taxes Other Than Income				
	Direct assigned - Jurisdiction	S	S	S	S
	Property	GPS	GPS	GPS	GPS
	System Taxes	SO	SO	SO	SO
	Misc Energy	SE	SE	SE	SE
	Misc Production	SG	SG	SG	SG
DEFERRED ITC					
41140	Deferred Investment Tax Credit - Fed ITC	DGU	DGU	DGU	DGU
41141	Deferred Investment Tax Credit - Idaho ITC	DGU	DGU	DGU	DGU
Interest Expense					
427	Interest on Long-Term Debt				
	Direct assigned - Jurisdiction	S	S	S	S
	Interest Expense	SNP	SNP	SNP	SNP
428	Amortization of Debt Disc & Exp Interest Expense	SNP	SNP	SNP	SNP
429	Amortization of Premium on Debt Interest Expense	SNP	SNP	SNP	SNP
431	Other Interest Expense Interest Expense	SNP	SNP	SNP	SNP
432	AFUDC - Borrowed AFUDC	SNP	SNP	SNP	SNP
Interest & Dividends					
419	Interest & Dividends Interest & Dividends	SNP	SNP	SNP	SNP
DEFERRED INCOME TAXES					
41010	Deferred Income Tax - Federal-DR				
	Direct assigned - Jurisdiction	S	S	S	S
	Electric Plant in Service	DITEXP	DITEXP	DITEXP	DITEXP
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Property Tax related	GPS	GPS	GPS	GPS
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	SNPD	SNPD	SNPD	SNPD
	Mining Plant	SE	SE	SE	SE
	Bad Debt	N/A	BADDEBT	BADDEBT	BADDEBT
	Tax Depreciation	N/A	TAXDEPR	TAXDEPR	TAXDEPR
	Cholla*	N/A	SSGCH	N/A	N/A

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original		Current Definition	
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
41011	Deferred Income Tax - State-DR				
	Direct assigned - Jurisdiction	S	S	S	S
	Electric Plant in Service	DITEXP	DITEXP	DITEXP	DITEXP
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Property Tax related	GPS	GPS	GPS	GPS
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	SNPD	SNPD	SNPD	SNPD
	Mining Plant	SE	SE	SE	SE
	Bad Debt	N/A	BADDEBT	BADDEBT	BADDEBT
	Tax Depreciation	N/A	TAXDEPR	TAXDEPR	TAXDEPR
41110	Deferred Income Tax - Federal-CR				
	Direct assigned - Jurisdiction	S	S	S	S
	Electric Plant in Service	DITEXP	DITEXP	DITEXP	DITEXP
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Property Tax related	GPS	GPS	GPS	GPS
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	SNPD	SNPD	SNPD	SNPD
	Mining Plant	SE	SE	SE	SE
	Contributions in aid of construction	N/A	CIAC	CIAC	CIAC
	Production, Other	N/A	SGCT	SGCT	SGCT
	Book Depreciation	N/A	SCHMDEXP	SCHMDEXP	SCHMDEXP
	Cholla*	N/A	SSGCH	N/A	N/A
41111	Deferred Income Tax - State-CR				
	Direct assigned - Jurisdiction	S	S	S	S
	Electric Plant in Service	DITEXP	DITEXP	DITEXP	DITEXP
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Property Tax related	GPS	GPS	GPS	GPS
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	SNPD	SNPD	SNPD	SNPD
	Mining Plant	SE	SE	SE	SE
	Contributions in aid of construction	N/A	CIAC	CIAC	CIAC
	Production, Other	N/A	SGCT	SGCT	SGCT
	Book Depreciation	N/A	SCHMDEXP	SCHMDEXP	SCHMDEXP
SCHEDULE - M ADDITIONS					
SCHMAF	Additions - Flow Through				
	Direct assigned - Jurisdiction	S	S	S	S

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
SCHMAP	Additions - Permanent				
	Direct assigned - Jurisdiction	N/A	S	S	S
	Mining related	SE	SE	SE	SE
	General	SO	SO	SO	SO
	Production / Transmission	N/A	SG	SG	SG
	Depreciation	N/A	SCHMDEXP	SCHMDEXP	SCHMDEXP
SCHMAT	Additions - Temporary				
	Direct assigned - Jurisdiction	S	S	S	S
	Contributions in aid of construction	CIAC	CIAC	CIAC	CIAC
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Pacific Hydro	SG	SG	SG	SG
	Mining Plant	SE	SE	SE	SE
	Production, Transmission	SG	SG	SG	SG
	Property Tax	GPS	GPS	GPS	GPS
	General	SO	SO	SO	SO
	Depreciation	SCHMDEXP	SCHMDEXP	SCHMDEXP	SCHMDEXP
	Distribution	N/A	SNPD	SNPD	SNPD
	Production, Other	N/A	SGCT	SGCT	SGCT
SCHEDULE - M DEDUCTIONS					
SCHMDF	Deductions - Flow Through				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Pacific Hydro	SG	SG	SG	SG
SCHMDP	Deductions - Permanent				
	Direct assigned - Jurisdiction	S	S	S	S
	Mining Related	SE	SE	SE	SE
	Miscellaneous	SNP	SNP	SNP	SNP
	General	SO	SO	SO	SO
SCHMDT	Deductions - Temporary				
	Direct assigned - Jurisdiction	S	S	S	S
	Bad Debt	BADDEBT	BADDEBT	BADDEBT	BADDEBT
	Miscellaneous	SNP	SNP	SNP	SNP
	Pacific Hydro	SG	SG	SG	SG
	Mining related	SE	SE	SE	SE
	Production, Transmission	SG	SG	SG	SG
	Property Tax	GPS	GPS	GPS	GPS
	General	SO	SO	SO	SO
	Depreciation	TAXDEPR	TAXDEPR	TAXDEPR	TAXDEPR
	Distribution	SNPD	SNPD	SNPD	SNPD
	Customer Related	N/A	CN	CN	CN
	Cholla*	N/A	SSGCH	N/A	N/A
State Income Taxes					
40911	State Income Taxes	IBT	CALCULATED**	CALCULATED**	CALCULATED**
40911	Renewable Energy Tax Credit	N/A	SG	SG	SG
40910	FIT True-up	S	S	S	S
40910	Renewable Energy Tax Credit	SG	SG	SG	SG

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		Allocation Factor			
Steam Production Plant					
310 - 316	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
Nuclear Production Plant					
320-325	Nuclear Plant	SG	SG	SG	SG
Hydraulic Plant					
330-336	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
Other Production Plant					
340-346	Other Production Plant	SG	SG	SG	SG
	Peaking Plants*	N/A	SSGCT	N/A	N/A
TRANSMISSION PLANT					
350-359	Transmission Plant	SG	SG	SG	SG
DISTRIBUTION PLANT					
360-373	Direct assigned - Jurisdiction	S	S	S	S
GENERAL PLANT					
389 - 398	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Production / Transmission	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Mining	N/A	SE	SE	SE
399	Coal Mine				
	Remaining Mining Plant	SE	SE	SE	SE
399L	WIDCO Capital Lease				
	WIDCO Capital Lease	SE	SE	SE	SE
1011390	General Capital Leases				
	Direct assigned - Jurisdiction	S	S	S	S
	General	SO	SO	SO	SO
	Production / Transmission	N/A	SG	SG	SG

Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
INTANGIBLE PLANT		Allocation Factor			
301	Organization				
	Direct assigned - Jurisdiction	S	S	S	S
302	Franchise & Consent				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
303	Miscellaneous Intangible Plant				
	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Production / Transmission	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Mining	N/A	SE	SE	SE
303	Less Non-Utility Plant				
	Direct assigned - Jurisdiction	S	S	S	S
Rate Base Additions					
105	Plant Held For Future Use				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Mining Plant	SE	SE	SE	SE
114	Electric Plant Acquisition Adjustments				
	Direct assigned - Jurisdiction	S	S	S	S
	Production Plant	SG	SG	SG	SG
115	Accum Provision for Asset Acquisition Adjustments				
	Direct assigned - Jurisdiction	S	S	S	S
	Production Plant	SG	SG	SG	SG
120	Nuclear Fuel				
	Nuclear Fuel	SE	SE	SE	SE
124	Weatherization				
	Direct assigned - Jurisdiction	S	S	S	S
	General	SO	SO	SO	SO
182W	Weatherization				
	Direct assigned - Jurisdiction	S	S	S	S
186W	Weatherization				
	Direct assigned - Jurisdiction	S	S	S	S
151	Fuel Stock				
	Steam Production Plant	SE	SE	SE	SE
	Cholla*	N/A	SSECH	N/A	N/A

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original		Current Definition	
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
152	Fuel Stock - Undistributed Steam Production Plant	SE	SE	SE	SE
25316	DG&T Working Capital Deposit Mining Plant	SE	SE	SE	SE
25317	DG&T Working Capital Deposit Mining Plant	SE	SE	SE	SE
25319	Provo Working Capital Deposit Mining Plant	SE	SE	SE	SE
154	Materials and Supplies				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Mining	SE	SE	SE	SE
	General	SO	SO	SO	SO
	Production - Common	SNPPS	SNPPS	SG	SG
	Hydro	SNPPH	SNPPH	SG	SG
	Distribution	SNPD	SNPD	SNPD	SNPD
	Production, Other	N/A	SNPPO	SG	SG
163	Stores Expense Undistributed General	SO	SO	SO	SO
25318	Provo Working Capital Deposit Provo Working Capital Deposit	SNPPS	SNPPS	SG	SG
165	Prepayments				
	Direct assigned - Jurisdiction	S	S	S	S
	Property Tax	GPS	GPS	GPS	GPS
	Production, Transmission	SG	SG	SG	SG
	Mining	SE	SE	SE	SE
	General	SO	SO	SO	SO
182M	Misc Regulatory Assets				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Mining	SE	SE	SE	SE
	General	SO	SO	SO	SO
	Cholla Transaction	SSGCH	SGCT	SGCT	SGCT
186M	Misc Deferred Debits				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General	SO	SO	SO	SO
	Mining	SE	SE	SE	SE
	Production - Common	SNPPS	SNPPS	SG	SG
Working Capital					
CWC	Cash Working Capital				
	Direct assigned - Jurisdiction	S	S	S	S
OWC	Other Working Capital				

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		Allocation Factor			
131	Cash	SNP	SNP	SNP	SNP
135	Working Funds	SG	SG	SG	SG
141	Notes Receivable	N/A	SO	SO	SO
143	Other Accounts Receivable	SO	SO	SO	SO
232	Accounts Payable	SO	SO	SO	SO
232	Accounts Payable	SE	SE	SE	SE
232	Accounts Payable	N/A	SG	SG	SG
253	Deferred Hedge	SE	SE	SE	SE
25330	Other Deferred Credits - Misc	SE	SE	SE	SE
230	Other Deferred Credits - Misc	N/A	SE	SE	SE
254105	ARO Reg Liability	N/A	SE	SE	SE
Miscellaneous Rate Base					
18221	Unrec Plant & Reg Study Costs				
	Direct assigned - Jurisdiction	S	S	S	S
18222	Nuclear Plant - Trojan				
	Trojan Plant	TROJP	TROJP	TROJP	TROJP
	Trojan Plant	TROJD	TROJD	TROJD	TROJD
141	Notes Receivable				
	Employee Loans - Hunter Plant	SG	SG	SG	SG
Rate Base Deductions					
235	Customer Service Deposits				
	Direct assigned - Jurisdiction	S	S	S	S
2281	Prov for Property Insurance	SO	SO	SO	SO
2282	Prov for Injuries & Damages	SO	SO	SO	SO
2283	Prov for Pensions and Benefits	SO	SO	SO	SO
22841	Accum Misc Oper Prov				
	Mining	SE	SE	SE	SE
	Other Production	N/A	SG	SG	SG
22842	Accum Misc Oper Prov-Trojan				
	Trojan Plant	TROJD	TROJD	TROJD	TROJD
254105	FAS 143 ARO Regulatory Liability				
	Trojan Plant	N/A	TROJP	TROJP	TROJP
230	Asset Retirement Obligation				
	Trojan Plant	N/A	TROJP	TROJP	TROJP

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
252	Customer Advances for Construction				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
25398	SO2 Emissions	N/A	SE	SE	SE
25399	Other Deferred Credits				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General	N/A	SO	SO	SO
	Mining	SE	SE	SE	SE
254	Regulatory Liabilities				
	Regulatory Liabilities	N/A	S	S	S
	Regulatory Liabilities	N/A	SE	SE	SE
	Insurance Provision	N/A	SO	SO	SO
190	Accumulated Deferred Income Taxes				
	Direct assigned - Jurisdiction	S	S	S	S
	Bad Debt	BADDEBT	BADDEBT	BADDEBT	BADDEBT
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	N/A	SNPD	SNPD	SNPD
	Mining Plant	N/A	SE	SE	SE
281	Accumulated Deferred Income Taxes				
	Production, Transmission	SG	SG	SG	SG
282	Accumulated Deferred Income Taxes				
	Direct assigned - Jurisdiction	S	S	S	S
	Depreciation	DITBAL	DITBAL	DITBAL	DITBAL
	Hydro Pacific	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJP	TROJP	TROJP
	Depreciation	N/A	TAXDEPR	TAXDEPR	TAXDEPR
	Depreciation	N/A	SCHMDEXP	SCHMDEXP	SCHMDEXP
	System Gross Plant	N/A	GPS	GPS	GPS
	Contribution in Aid of Construction	N/A	CIAC	CIAC	CIAC
	Cholla*	N/A	SSGCH	N/A	N/A
	Mining	N/A	SE	SE	SE

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		Allocation Factor			
283	Accumulated Deferred Income Taxes				
	Direct assigned - Jurisdiction	S	S	S	S
	Depreciation	DITBAL	DITBAL	DITBAL	DITBAL
	Hydro Pacific	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Production, Other	N/A	SGCT	SGCT	SGCT
	Property Tax	N/A	GPS	GPS	GPS
	Mining Plant	N/A	SE	SE	SE
255	Accumulated Investment Tax Credit				
	Direct assigned - Jurisdiction	S	S	S	S
	Investment Tax Credits	ITC84	ITC84	ITC84	ITC84
	Investment Tax Credits	ITC85	ITC85	ITC85	ITC85
	Investment Tax Credits	ITC86	ITC86	ITC86	ITC86
	Investment Tax Credits	ITC88	ITC88	ITC88	ITC88
	Investment Tax Credits	ITC89	ITC89	ITC89	ITC89
	Investment Tax Credits	ITC90	ITC90	ITC90	ITC90
	Investment Tax Credits	DGU	DGU	DGU	DGU
PRODUCTION PLANT ACCUM DEPRECIATION					
108SP	Steam Prod Plant Accumulated Depr				
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
108NP	Nuclear Prod Plant Accumulated Depr				
	Nuclear Plant	SG	SG	SG	SG
108HP	Hydraulic Prod Plant Accum Depr				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
108OP	Other Production Plant - Accum Depr				
	Other Production Plant	SG	SG	SG	SG
	Peaking Plants*	N/A	SSGCT	N/A	N/A
TRANS PLANT ACCUM DEPR					
108TP	Transmission Plant Accumulated Depr				
	Transmission Plant	SG	SG	SG	SG
DISTRIBUTION PLANT ACCUM DEPR					
108360 - 108373	Distribution Plant Accumulated Depr				
	Direct assigned - Jurisdiction	S	S	S	S
108D00	Unclassified Dist Plant - Acct 300				
	Direct assigned - Jurisdiction	S	S	S	S
108DS	Unclassified Dist Sub Plant - Acct 300				
	Direct assigned - Jurisdiction	S	S	S	S
108DP	Unclassified Dist Sub Plant - Acct 300				

**Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
	Direct assigned - Jurisdiction	S	S	S	S
GENERAL PLANT ACCUM DEPR					
108GP	General Plant Accumulated Depr				
	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Production / Transmission	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Customer Related	CN	CN	CN	CN
	General SO	SO	SO	SO	SO
	Mining Plant	N/A	SE	SE	SE
108MP	Mining Plant Accumulated Depr.				
	Mining Plant	SE	SE	SE	SE
108MP	Less Centralia Situs Depreciation				
	Direct assigned - Jurisdiction	S	S	S	S
1081390	Accum Depr - Capital Lease				
	General	SO	SO	SO	SO
1081399	Accum Depr - Capital Lease				
	Direct assigned - Jurisdiction	S	S	S	S
ACCUM PROVISION FOR AMORTIZATION					
111SP	Accum Prov for Amort-Steam				
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
111GP	Accum Prov for Amort-General				
	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Production / Transmission	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Customer Related	CN	CN	CN	CN
	General SO	SO	SO	SO	SO
111HP	Accum Prov for Amort-Hydro				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG

Exhibit A to the Agreement
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		<u>Allocation Factor</u>			
111IP	Accum Prov for Amort-Intangible Plant				
	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	General	SO	SO	SO	SO
	Mining	SE	SE	SE	SE
	Customer Related	CN	CN	CN	CN
	Cholla*	SSGCH	SSGCH	N/A	N/A
111IP	Less Non-Utility Plant				
	Direct assigned - Jurisdiction	S	S	S	S
111399	Accum Prov for Amort-Mining				
	Mining Plant	SE	SE	SE	SE

Notes:

* Peaking plants and Cholla are no longer allocated on seasonal factors in the 2010 Protocol -- they are included in Steam Plants, Other Production Plant, and Production / Transmission categories.

** Rather than allocated to jurisdictions using the Income Before Tax factors, state income taxes are calculated by applying the blended statutory state and local tax rate to taxable income by jurisdiction.

EXHIBIT B

**TO THE AGREEMENT PERTAINING TO PACIFICORP'S SEPTEMBER 15, 2010
APPLICATION FOR APPROVAL OF AMENDMENTS TO REVISED PROTOCOL
ALLOCATION METHODOLOGY**

2010 Protocol - Appendix C
Allocation Factors
Algebraic Derivations

September 15, 2010

Allocation Factors

PacifiCorp serves eight jurisdictions. Jurisdictions are represented by the index i = California, Idaho, Oregon, Utah, Washington, Eastern Wyoming, Western Wyoming, & FERC.

The following assumptions are made in the factor derivations:

It is assumed that the 12CP ($j=1$ to 12) method is used in defining the System Capacity (“SC”).

It is assumed that twelve months ($j=1$ to 12) method is used in defining the System Energy (“SE”).

In defining the System Generation (“SG”) factor, the weighting of 75 percent System Capacity, 25 percent System Energy is assumed to continue.

While it is agreed that the peak loads & input energy should be temperature adjusted, no decision has been made upon the methodology to do these adjustments.

System Capacity Factor (“SC”)

$$SC_i = \frac{\sum_{j=1}^{12} TAP_{ij}}{8 \sum_{i=1}^{12} \sum_{j=1}^{12} TAP_{ij}}$$

where:

SC_i = System Capacity Factor for jurisdiction i .

TAP_{ij} = Temperature Adjusted Peak Load of jurisdiction i in month j at the time of the System Peak.

System Energy Factor (“SE”)

$$SE_i = \frac{\sum_{j=1}^{12} TAE_{ij}}{8 \sum_{i=1}^{12} \sum_{j=1}^{12} TAE_{ij}}$$

where:

SE_i = System Energy Factor for jurisdiction i.
 TAE_{ij} = Temperature Adjusted Input Energy of jurisdiction i in month j.

System Generation Factor (“SG”)

$$SG_i = .75 * SC_i + .25 * SE_i$$

where:

SG_i = System Generation Factor for jurisdiction i.
 SC_i = System Capacity for jurisdiction i.
 SE_i = System Energy for jurisdiction i.

System Generation Cholla Transaction Factor (“SGCT”)

$$SGCT_i = \frac{SG_i^*}{\sum_{i=1}^{i=8} SG_i^*}$$

where:

SG_i^* = SG_i if i is jurisdiction other than FERC, otherwise
 $SG_i^* = 0$.
 SG_i = System Generation for jurisdiction i.

Mid-C Factor (“MC”)

$$MC_i = \frac{WMCE_i}{\sum_{i=1}^{i=8} WMCE_i}$$

where:

MC_i = **Mid-C Factor** for jurisdiction i.

$$WMCE = E_{ipr}^* + (E_{rr} * SG_i) + (E_{wa} * WWA_i) + (E_w * SG_i) \quad \text{Weighted Mid-C Contracts annual energy generation}$$

where:

E_{ipr}^* = E_{ipr} If i is Oregon, otherwise

$E_{ipr}^* = 0$

E_{ipr} = Annual Energy generation of Priest Rapids.

E_{pr} = Annual Energy generation of Rocky Reach.

E_{wa} = Annual Energy generation of Wanapum.

E_w = Annual Energy generation of Wells.

$$WWA_i = \frac{SG_i^*}{\sum_{i=1}^{i=8} SG_i^*} \quad \text{Weighted Wanapum Energy}$$

where:

SG_i^* = SG_i if i is Washington or Oregon jurisdiction, otherwise

$SG_i^* = 0$.

SG_i = System Generation for jurisdiction i.

Division Generation - Pacific Factor (“DGP”)

$$DGP_i = \frac{SG_i^*}{\sum_{i=1}^{i=8} SG_i^*}$$

where:

DGP_i = **Division Generation - Pacific Factor** for jurisdiction i.

SG_i^* = SG_i if i is a Pacific jurisdiction, otherwise

$SG_i^* = 0$.

SG_i = System Generation for jurisdiction i.

Division Generation - Utah Factor (“DGU”)

$$DGU_i = \frac{SG_i^*}{\sum_{i=1}^{i=8} SG_i^*}$$

where:

DGU_i = **Division Generation - Utah Factor** for jurisdiction i.

SG_i^* = SG_i if i is a Utah jurisdiction, otherwise

$SG_i^* = 0$.

SG_i = System Generation for jurisdiction i.

System Net Plant - Distribution Factor (“SNPD”)

$$SNPD_i = \frac{PD_i - ADPD_i}{(PD - ADPD)}$$

where:

- $SNPD_i$ = **System Net Plant - Distribution Factor** for jurisdiction i.
- PD_i = **Distribution Plant** - for jurisdiction i.
- $ADPD_i$ = **Accumulated Depreciation Distribution Plant** - for jurisdiction i.
- PD = **Distribution Plant**.
- $ADPD$ = **Accumulated Depreciation Distribution Plant**.

System Gross Plant - System Factor (“GPS”)

$$GPS_i = \frac{PP_i + PT_i + PD_i + PG_i + PI_i}{\sum_{i=1}^{i=8} (PP_i + PT_i + PD_i + PG_i + PI_i)}$$

- $GP-S_i$ = **Gross Plant - System Factor** for jurisdiction i.
- PP_i = **Production Plant** for jurisdiction i.
- PT_i = **Transmission Plant** for jurisdiction i.
- PD_i = **Distribution Plant** for jurisdiction i.
- PG_i = **General Plant** for jurisdiction i.
- PI_i = **Intangible Plant** for jurisdiction i.

System Net Plant Factor (“SNP”)

$$SNP_i = \frac{PP_i + PT_i + PD_i + PG_i + PI_i - ADPP_i - ADPT_i - ADPD_i - ADPG_i - ADPI_i}{\sum_{i=1}^{i=8} (PP_i + PT_i + PD_i + PG_i + PI_i - ADPP_i - ADPT_i - ADPD_i - ADPG_i - ADPI_i)}$$

- SNP_i = **System Net Plant Factor** for jurisdiction i.
- PP_i = Production Plant for jurisdiction i.
- PT_i = Transmission Plant for jurisdiction i.
- PD_i = Distribution Plant for jurisdiction i.
- PG_i = General Plant for jurisdiction i.
- PI_i = Intangible Plant for jurisdiction i.
- $ADPP_i$ = Accumulated Depreciation Production Plant for jurisdiction i.
- $ADPT_i$ = Accumulated Depreciation Transmission Plant for jurisdiction i.
- $ADPD_i$ = Accumulated Depreciation Distribution Plant for jurisdiction i.
- $ADPG_i$ = Accumulated Depreciation General Plant for jurisdiction i.
- $ADPI_i$ = Accumulated Depreciation Intangible Plant for jurisdiction i.

System Overhead - Gross Factor (“SO”)

$$SOG_i = \frac{PP_i + PT_i + PD_i + PG_i + PI_i - PP_{oi} - PT_{oi} - PD_{oi} - PG_{oi} - PI_{oi}}{\sum_{i=1}^{i=8} (PP_i + PT_i + PD_i + PG_i + PP_i - PP_{oi} - PT_{oi} - PD_{oi} - PG_{oi} - PI_{oi})}$$

- SOG_i = **System Overhead - Gross Factor** for jurisdiction i.
 PP_i = Gross Production Plant for jurisdiction i.
 PT_i = Gross Transmission Plant for jurisdiction i.
 PD_i = Gross Distribution Plant for jurisdiction i.
 PG_i = Gross General Plant for jurisdiction i.
 PI_i = Gross Intangible Plant for jurisdiction i.
 PP_{oi} = Gross Production Plant for jurisdiction i allocated on a SO factor.
 PT_{oi} = Gross Transmission Plant for jurisdiction i allocated on a SO factor.
 PD_{oi} = Gross Distribution Plant for jurisdiction i allocated on a SO factor.
 PG_{oi} = Gross General Plant for jurisdiction i allocated on a SO factor.
 PI_{oi} = Gross Intangible Plant for jurisdiction i allocated on a SO factor.

Bad Debt Expense Factor (“BADDEBT”)

$$BADDEBT_i = \frac{ACCT904_i}{\sum_{i=1}^{i=8} ACCT904_i}$$

- $BADDEBT_i$ = **Bad Debt Expense Factor** for jurisdiction i.
 $ACCT904_i$ = Balance in Account 904 for jurisdiction i.

Customer Number Factor (“CN”)

$$CN_i = \frac{CUST_i}{\sum_{i=1}^{i=8} CUST_i}$$

where:

CN_i = Customer Number Factor for jurisdiction i.
 $CUST_i$ = Total Electric Customers for jurisdiction i.

Contributions in Aid of Construction (“CIAC”)

$$CIAC_i = \frac{CIACNA_i}{\sum_{i=1}^{i=8} CIACNA_i}$$

where:

$CIAC_i$ = Contributions in Aid of Construction Factor for jurisdiction i.
 $CIACNA_i$ = Contributions in Aid of Construction – Net additions for jurisdiction i.

Schedule M - Deductions (“SCHMDEXP”)

$$SCHMDEXP_i = \frac{DEPRC_i}{\sum_{i=1}^{i=8} DEPRC_i}$$

where:

$SCHMDEXP_i$ = Schedule M - Deductions (SCHMDEXP) Factor for jurisdiction i.
 $DEPRC_i$ = Depreciation in Accounts 403.1 - 403.9 for jurisdiction i.

Trojan Plant (“TROJP”)

$$TROJP_i = \frac{ACCT18222_i}{\sum_{i=1}^{i=8} ACCT18222_i}$$

where: $TROJP_i$ = Trojan Plant (TROJP) Factor for jurisdiction i.
 $ACCT18222_i$ = Allocated Adjusted Balance in Account 182.22 for jurisdiction i.

Trojan Decommissioning (“TROJD”)

$$TROJD_i = \frac{ACCT22842_i}{\sum_{i=1}^{i=8} ACCT22842_i}$$

where: $TROJD_i$ = Trojan Decommissioning (TROJD) Factor for jurisdiction i.
 $ACCT22842_i$ = Allocated Adjusted Balance in Account 228.42 for jurisdiction i.

Tax Depreciation (“TAXDEPR”)

$$TAXDEPR_i = \frac{TAXDEPRA_i}{\sum_{i=1}^{i=8} TAXDEPRA_i}$$

where:

$TAXDEPR_i$ = **Tax Depreciation (TAXDEPR) Factor** for jurisdiction i.
 $TAXDEPRA_i$ = Tax Depreciation allocated to jurisdiction i.

(Tax Depreciation is allocated based on functional pre merger and post merger splits of plant using Divisional and System allocations from above. Each jurisdiction’s total allocated portion of Tax depreciation is determined by its total allocated ratio of these functional pre and post merger splits to the total Company Tax Depreciation.)

Deferred Tax Expense (“DITEXP”)

$$DITEXP_i = \frac{DITEXPA_i}{\sum_{i=1}^{i=8} DITEXPA_i}$$

where:

$DITEXP_i$ = **Deferred Tax Expense (DITEXP) Factor** for jurisdiction i.
 $DITEXPA_i$ = Deferred Tax Expense allocated to jurisdiction i.

(Deferred Tax Expense is allocated by a run of PowerTax based upon the above factors. PowerTax is a computer software package used to track Deferred Tax Expense & Deferred Tax Balances. PowerTax allocates Deferred Tax Expense and Deferred Tax Balances to the states based upon a computer run which uses as inputs the preceding factors. If the preceding factors change, the factors generated by PowerTax change.)

Deferred Tax Balance (“DITBAL”)

$$DITBAL_i = \frac{DITBALA_i}{\sum_{i=1}^{i=8} DITBALA_i}$$

where:

$DITBAL_i$ = **Deferred Tax Balance (DITBAL) Factor** for jurisdiction i.
 $DITBALA_i$ = Deferred Tax Balance allocated to jurisdiction i.

(Deferred Tax Balance is allocated by a run of PowerTax based upon the above factors. PowerTax is a computer software package used to track Deferred Tax Expense & Deferred Tax Balances. PowerTax allocates Deferred Tax Expense and Deferred Tax Balances to the states based upon a computer run which uses as inputs the preceding factors. If the preceding factors change, the factors generated by PowerTax change.)