

# **Exhibit K**



201 South Main, Suite 2300  
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March 1, 2011

***VIA EMAIL  
AND OVERNIGHT DELIVERY***

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RE: UT Docket No. 10-035-124  
UIEC 1<sup>st</sup> Set Data Request (1-111)

Please find enclosed Rocky Mountain Power's Responses to UIEC 1<sup>st</sup> Set Data Requests 1.1 – 1.2, 1.11, 1.18, 1.34, 1.42, 1.44, 1.47, 1.48, 1.51-1.52, 1.54-1.59, 1.61-1.79, 1.81, 1.91-1.92, 1.95, 1.97, 1.99, 1.101-1.104, and 1.110. The remainder of the set will be provided separately. Provided on the enclosed CD are Attachments UIEC 1.1 -1 and 1.99. Provided on the enclosed Confidential CD are Confidential Attachments UIEC 1.1 -2 and 1.42. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

If you have any questions, please call Barry Bell at (801) 220-4985.

Sincerely,

Dave Taylor  
Manager, Regulation

Enclosure

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10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.1

**UIEC Data Request 1.1**

Please provide copies of all past and future data requests received by RMP and corresponding data responses issued by RMP to any and all other parties in this docket. Please include both formal and informal responses.

**Response to UIEC Data Request 1.1**

Please refer to Attachment UIEC 1.1 -1 and Confidential Attachment UIEC 1.1 - 2. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

Going forward, the Company will provide UIEC with copies of all responses to data requests submitted by other parties in this docket as they are completed.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.2

**UIEC Data Request 1.2**

Please provide all passwords, instructions and other information necessary for UIEC's consultants to access and utilize the GRID model and any other models used or to be used by the Company in this docket.

**Response to UIEC Data Request 1.2**

The Company provided access for Mr. Brian Collins and Mr. Mark Widmer to the GRID model in the current proceeding on February 7, 2011 for delivery on February 8, 2011.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.11

**UIEC Data Request 1.11**

If other electrical service providers in Oregon have experienced a reduction in load during the comparable period over which PacifiCorp has experienced a reduction in its Oregon load,

- (a) How do the others' reductions compare to PacifiCorp's reduction;
- (b) What is the magnitude of the others' reductions in load;
- (c) What opportunities, if any, are available to PacifiCorp as a result of others' reductions in load; and
- (d) What are the reasons for the others' reductions in load?

**Response to UIEC Data Request 1.11**

The Company objects to providing the requested information on the basis that it is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving the objection, the Company is not aware of what other electrical service providers in Oregon have experienced.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.18

**UIEC Data Request 1.18**

How does PacifiCorp track and account for all its RECs, including, but not limited to, Oregon-allocated RECS and Oregon-allocated but RPS-ineligible RECs.

**Response to UIEC Data Request 1.18**

The Company maintains a working database that tracks the megawatt-hours from renewable facilities on a total company basis, and a calculated breakdown of the megawatt-hours by renewable facility on a state basis. Additionally, for any facility that is registered in the Western Renewable Energy Generation Information System (WREGIS), the Company tracks the total Company WREGIS certificates in WREGIS. Oregon-allocated but RPS-ineligible RECs are accounted for in accordance with the deferred accounting order filed in Oregon.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.34

**UIEC Data Request 1.34**

Please provide by year for the years 2008, 2009, and 2010, the total number of kilowatt-hours PacifiCorp was required to generate, acquire or save from renewable energy systems, Green Tags, or White Tags® to comply with its renewable portfolio standard (“RPS”) in Oregon.

**Response to UIEC Data Request 1.34**

The Company did not have any renewable energy requirements for the Oregon renewable portfolio standard in 2008, 2009 and 2010.

There currently is no requirement related to White Tags in the Oregon’s renewable portfolio standard program.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.42

**UIEC Data Request 1.42**

Please provide the total number of kilowatt-hours PacifiCorp expects to carry forward as excess kilowatt-hours that PacifiCorp generated acquired or saved from renewable energy system, Green Tags, or White Tags® in complying with Oregon's RPS for 2011, indicating the amount and year for each kilowatt-hour expected to be carried forward.

**Response to UIEC Data Request 1.42**

Please refer to Confidential Attachment UIEC 1.42 for the amount of renewable energy credits (RECs) that PacifiCorp estimates from eligible renewable resources that may be used for compliance with Oregon's RPS in 2011. The Company has neither created nor acquired any White Tags. Confidential information is provided subject to the terms and conditions of the protective agreement in this proceeding.



10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.44

**UIEC Data Request 1.44**

Has PacifiCorp failed to comply with its Oregon RPS for 2008, 2009, or 2010? If so, for each year of non-compliance, state:

- (a) The year of non-compliance;
- (b) The number of kilowatt-hours by which PacifiCorp failed to comply with its Oregon RPS; and
- (c) The action taken by the OPUC for such non-compliance.

**Response to UIEC Data Request 1.44**

No. The first year for compliance for the Oregon RPS is 2011.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.47

**UIEC Data Request 1.47**

Please state for each month the parasitic load for each month for January 2008 through December 2010 in kilowatt-hours of each energy production facility owned by PacifiCorp that contributes to your answer to the previous request.

**Response to UIEC Data Request 1.47**

No renewable energy credits or WREGIS certificates are created for generation associated with parasitic load.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.48

**UIEC Data Request 1.48**

Please state for each month the parasitic load for each month for January 2008 through December 2010 of each energy production facility under contract to PacifiCorp where PacifiCorp contends that it owns the Green Tags associated with the energy production of the facility.

**Response to UIEC Data Request 1.48**

Please refer to the Company's response to UIEC Data Request 1.47.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.51

**UIEC Data Request 1.51**

Does PacifiCorp contend that the Green Tags either generated by its own production or acquired by contract from energy producers have a limited life? If so, please describe the limited life in each such case of limitation, and the source of PacifiCorp's position on whether there is a limited life.

**Response to UIEC Data Request 1.51**

Under WREGIS Operating Rules, WREGIS certificates do not expire.

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March 1, 2011  
UIEC Data Request 1.52

**UIEC Data Request 1.52**

What is PacifiCorp's policy of disposing of Green Tags for value before their expiration if PacifiCorp contends they expire?

**Response to UIEC Data Request 1.52**

Please refer to the Company's response to UIEC Data Request 1.51.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.54

**UIEC Data Request 1.54**

Please state for each month for January 2008 through December 2010 in kilowatt-hours the White Tags® created or acquired by PacifiCorp.

**Response to UIEC Data Request 1.54**

PacifiCorp has not created nor acquired any Energy Efficiency Certificates, i.e., "White Tags," in 2008, 2009, or 2010.

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March 1, 2011  
UIEC Data Request 1.55

**UIEC Data Request 1.55**

Of the White Tags® created or acquired by PacifiCorp, for each month for January 2008 through December 2010 the quantity sold in kilowatt-hours by PacifiCorp and the quantity retained in kilowatt hours?

**Response to UIEC Data Request 1.55**

Please refer to the Company's response to UIEC Data Request 1.54.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.56

**UIEC Data Request 1.56**

Please provide by month for each month for January 2008 through December 2010 the revenue received for the sales that are the subject of the previous request and the value given to the quantity retained.

**Response to UIEC Data Request 1.56**

Please refer to the Company's response to UIEC Data Request 1.54.



10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.57

**UIEC Data Request 1.57**

Does PacifiCorp contend that White Tags® have a limited life? If so, please describe the limited life in each such case of limitation, and the source of PacifiCorp's position on whether there is a limited life.

**Response to UIEC Data Request 1.57**

PacifiCorp has no knowledge of White Tag lives.

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March 1, 2011  
UIEC Data Request 1.58

**UIEC Data Request 1.58**

What is PacifiCorp's policy of disposing of White Tags® for value before their expiration if PacifiCorp contends they expire?

**Response to UIEC Data Request 1.58**

PacifiCorp has no policy on this. Please refer to the Company's response to UIEC Data Request 1.54.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.59

**UIEC Data Request 1.59**

Does PacifiCorp maintain a “bank” of White Tags®? If so, please state in kilowatt-hours the current balance in the “bank” of White Tags®.

**Response to UIEC Data Request 1.59**

Please refer to the Company’s response to UIEC 1.54.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.61

**UIEC Data Request 1.61**

How does PacifiCorp account for the value of White Tags® in its “bank” and not sold?

**Response to UIEC Data Request 1.61**

Please refer to the Company’s response to UIEC 1.54.

**UIEC Data Request 1.62**

For what years does RMP anticipate that tax benefits are available to it under the bonus depreciation law that is part of the *Tax Relief Unemployment Insurance Reauthorization and Job Creation Act of 2010* (hereinafter the “Bonus Depreciation Act”)?

**Response to UIEC Data Request 1.62**

Generally speaking, property is eligible for bonus depreciation during 2010, 2011, and 2012 when it meets the following requirements:

- > The property is tangible personal property with a tax life of 20 years or less;
- > The taxpayer is the original, or first, user of the property;
- > The property must be acquired during the relevant period; and
  - 50% Bonus: After 12/31/2007 and prior to 09/09/2010, or in 2012
  - 100% Bonus: After 09/08/2010 and prior to 01/01/2012
- > The property must be placed in service during the relevant period.
  - 50% Bonus: After 12/31/2007 and prior to 09/09/2010, or in 2012
  - 100% Bonus: After 09/08/2010 and prior to 01/01/2012

The Company intends to take bonus depreciation on all eligible property. Eligible property during the time period covered by this data request and the respective bonus depreciation rates are as follows:

- > New tangible personal property with a tax life of 20 years or less that is acquired and placed in service after 12/31/2007 and prior to 09/09/2010 is eligible for 50% bonus depreciation;
- > New tangible personal property with a tax life of 20 years or less that is acquired and placed in service after 09/08/2010 and prior to 01/01/2012 is eligible for 100% bonus depreciation; and
- > New tangible personal property with a tax life of 20 years or less that is acquired after 12/31/2007 and prior to 09/09/2010, and is placed in service after 09/08/2010 and prior to 01/01/2012, is eligible for 50% bonus depreciation.

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UIEC Data Request 1.63

**UIEC Data Request 1.63**

Please describe in detail the tax benefits available to RMP under the Bonus Depreciation Act for each year they are available?

**Response to UIEC Data Request 1.63**

Please see the response to UIEC Data Request 1.62.

**UIEC Data Request 1.64**

Please provide a list of all projects RMP anticipates will be eligible for bonus depreciation under the Bonus Depreciation Act, including:

- (a) The in-service date for each project;
- (b) The cost of each project;
- (c) The depreciation schedule for each project before passage of the Bonus Depreciation Act;
- (d) The depreciation schedule for each project since passage of the Bonus Depreciation Act;
- (e) The bonus depreciation that can be attributed to each project as a result of the Bonus Depreciation Act.

**Response to UIEC Data Request 1.64**

The Company does not perform its bonus depreciation analysis at a “project” level as requested in this data request and therefore the requested data is not available.

In order to facilitate an understanding of the level of bonus depreciation reflected in this general rate case, the Company has provided a summary, by year and by function, of total tax basis of assets in service and the related bonus and tax depreciation taken on those assets in response to OCS Data Request 2.17.

Attachment OCS 2.17 demonstrates that for the purposes of this general rate case, the Company has forecasted all assets placed in service during 2011 as eligible for 100% bonus depreciation, and all assets placed in service during 2012 as eligible for 50% bonus depreciation.

The Company’s 2010 bonus depreciation analysis is based on its 2010 year-end income tax provision. The detailed and voluminous analysis, which is performed on a Work Breakdown Structure (WBS) basis, is available for on-site review.

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UIEC Data Request 1.65

**UIEC Data Request 1.65**

For each applicable year, please provide by year a detailed description of the tax treatment RMP anticipates using for the bonus depreciation it may realize as a result of the Bonus Depreciation Act.

**Response to UIEC Data Request 1.65**

Please see the response to UIEC Data Request 1.68.



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UIEC Data Request 1.66

**UIEC Data Request 1.66**

How does the Company calculate deferred income tax in general?

**Response to UIEC Data Request 1.66**

With respect to temporary book-tax differences such as tax depreciation, which is inclusive of bonus depreciation, deferred income tax expense is computed by multiplying the temporary book-tax difference by the Company's blended federal and state statutory tax rate of 37.951%. This current year activity is then applied to the beginning balance for accumulated deferred income tax to arrive at the end of period balance.

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UIEC Data Request 1.67

**UIEC Data Request 1.67**

How does the Company propose to calculate deferred income tax to account for the bonus depreciation it may realize?

**Response to UIEC Data Request 1.67**

Please see the response to UIEC Data Request 1.68.

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March 1, 2011  
UIEC Data Request 1.68

**UIEC Data Request 1.68**

Does the Company use flow-through methods or normalization to calculate deferred income tax?

**Response to UIEC Data Request 1.68**

For ratemaking purposes in Utah, all temporary book-tax differences such as tax depreciation, which is inclusive of bonus depreciation, are accounted for on a normalized basis. The single exception is with respect to the temporary book-tax difference for equity AFUDC, which is accounted for on a flow-through basis.

Under normalized accounting for temporary book-tax differences, both current and deferred income tax expense is provided for in the expense component of rates. In addition, a related adjustment is made to rate base for accumulated deferred income taxes.

Accumulated deferred income taxes will be calculated for tax depreciation, which is inclusive of bonus depreciation on the same basis as is described in the Company's response UIEC Data Request 1.66.

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March 1, 2011  
UIEC Data Request 1.69

**UIEC Data Request 1.69**

For each year that RMP anticipates realizing savings as a result of accelerating tax benefits pursuant to the Bonus Depreciation Act, how much savings (in dollars) does RMP anticipate to save by year?

**Response to UIEC Data Request 1.69**

Please see Attachment OCS 2.17 for total bonus depreciation on qualifying assets placed in service during 2010, 2011 and 2012, for this general rate case. At the federal statutory tax rate of 35%, the temporary tax benefit of the bonus depreciation and related cash flow is expected to be approximately \$554.5 million for 2010, \$411.3 million for 2011 and \$137.6 million for 2012.

Bonus depreciation, however, simply accelerates the tax benefit that would have otherwise been available in a later tax year under normal accelerated tax depreciation. Accordingly, over the tax life of the related assets, there is no net tax savings realized.

Notwithstanding this analysis, the Company continues to await expected guidance from the U.S. Treasury which will potentially impact whether qualifying assets are eligible for 50% or 100% bonus depreciation. Accordingly the expected tax benefit and related cash flow may change.

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UIEC Data Request 1.70

**UIEC Data Request 1.70**

For what does RMP anticipate using the savings realized as a result of accelerating tax benefits pursuant to the Bonus Depreciation Act?

**Response to UIEC Data Request 1.70**

As noted in response to UIEC Data Request 1.69, as compared to normal accelerated tax depreciation there is no net tax savings realized as a result of bonus depreciation. However, the related cash flow from tax benefits will be accelerated under bonus depreciation as compared to normal tax depreciation. Please see lines 76-94 in the direct testimony of Bruce N. Williams for a related discussion of the cash flow impacts of bonus depreciation.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.71

**UIEC Data Request 1.71**

For each year RMP anticipates an impact on its tax liabilities as a result of the Bonus Depreciation Act, what is the magnitude of that impact, in dollars, by year?

**Response to UIEC Data Request 1.71**

Please see Attachment OCS 2.17 and the response to UIEC Data Request 1.69.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.72

**UIEC Data Request 1.72**

For each year RMP anticipates that its taxable income will be reduced as a result of the bonus depreciation it takes, what is the magnitude, in dollars, of that impact by year?

**Response to UIEC Data Request 1.72**

Please see Attachment OCS 2.17 and the response to UIEC Data Request 1.69.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.73

**UIEC Data Request 1.73**

For each year RMP anticipates that its actual tax income expense will be reduced as a result of the bonus depreciation it takes, what is the magnitude, in dollars, of that impact by year?

**Response to UIEC Data Request 1.73**

As described in response to UIEC Data Request 1.68, the Company uses the normalized method of accounting for tax depreciation, which is inclusive of bonus depreciation. Under normalized accounting, the temporary book-tax difference related to bonus depreciation has no net impact on the Company's total regulated income tax expense in any respective year.



10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.74

**UIEC Data Request 1.74**

How does RMP anticipate recognizing in rates the bonus depreciation it takes?

**Response to UIEC Data Request 1.74**

Please see the response to UIEC Data Request 1.68.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.75

**UIEC Data Request 1.75**

Does RMP anticipate the bonus depreciation it takes to reduce its earnings? If so, by how much does RMP anticipate its earnings to be reduced and for what years?

**Response to UIEC Data Request 1.75**

No.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.76

**UIEC Data Request 1.76**

How does RMP anticipate sharing the benefits of the Bonus Depreciation Act between shareholders and ratepayers?

**Response to UIEC Data Request 1.76**

As explained in the February 1, 2011, technical conference in Docket 10-035-127, the impact of the Bonus Depreciation Act will flow to customers through accumulated deferred income taxes. The impact of bonus depreciation on accumulated deferred income taxes will be reflected in rate base as part of the current and future general rate cases.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.77

**UIEC Data Request 1.77**

Would RMP consider deferring some or all of the benefits of the Bonus Depreciation Act?

**Response to UIEC Data Request 1.77**

As explained in the February 1, 2011, technical conference in Docket 10-035-127, the impact of the Bonus Depreciation Act is being deferred through accumulated deferred income taxes. The impact of bonus depreciation on accumulated deferred income taxes will be reflected in rate base as part of the current and future general rate cases.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.78

**UIEC Data Request 1.78**

Would RMP consider using a historic test year to enable ratepayers to share in the benefits of the Bonus Depreciation Act?

**Response to UIEC Data Request 1.78**

No. As described in the response to UIEC DR 1.76 and 1.77, the impact of bonus depreciation on accumulated deferred income taxes will be reflected in rate base as part of the current and future general rate cases. A historic test period is not necessary to enable ratepayers to receive the benefits of the Bonus Depreciation Act

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UIEC Data Request 1.79

**UIEC Data Request 1.79**

Would RMP consider not asking for rate increases from Utah ratepayers for several years in order to share the benefits of the Bonus Depreciation Act between shareholders and ratepayers?

**Response to UIEC Data Request 1.79**

No. See the response to UIEC DR 1.76 and 1.77.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.81

**UIEC Data Request 1.81**

Please provide a copy of the final order from RMP's general rate case in Idaho as soon as it is available.

**Response to UIEC Data Request 1.81**

The Idaho Commission's final order is available on the Commission website at the following link:

<http://www.puc.idaho.gov/internet/cases/summary/PACE1007.html>

10-035-124/Rocky Mountain Power  
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UIEC Data Request 1.91

**UIEC Data Request 1.91**

Please provide a detailed breakdown of the Company's system costs for wind integration.

**Response to UIEC Data Request 1.91**

Please refer to Company's report of its 2010 Wind Integration Study that is referenced in Mr. Duvall's testimony, specifically Table 13 of the report. The report is located at  
[http://www.pacificorp.com/content/dam/pacificorp/doc/Energy\\_Sources/Integrated\\_Resource\\_Plan/Wind\\_Integration/PacificCorp\\_2010WindIntegrationStudy\\_090110.pdf](http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/Wind_Integration/PacificCorp_2010WindIntegrationStudy_090110.pdf)



10-035-124/Rocky Mountain Power  
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UIEC Data Request 1.92

**UIEC Data Request 1.92**

Please provide by year and by customer how much wholesale transmission customers were charged for wind integration in 2009 and 2010, and how much the Company forecasts to charge wholesale transmission customers in 2011 and 2012.

**Response to UIEC Data Request 1.92**

PacifiCorp's Open Access Transmission Tariff ("OATT"), which is based upon the Federal Energy Regulatory Commission's *pro forma* OATT containing FERC-mandated terms and conditions for wholesale transmission service, including ancillary services, does not contain an explicit ancillary service charge for "wind integration" services. The OATT does contain terms and rates for reserve services; reserves are generally used to help integrate wind into the transmission system. For 2009, third-party wholesale transmission customers were charged approximately \$2.5m for reserve services. For 2010, third-party wholesale transmission customers were charged approximately \$3m for reserve services. The Company does not have a forecast for a wholesale wind integration charge for wholesale transmission customers for 2011 and 2012. The Company forecasts approximately \$3m for reserve services for 2011 and does not have a forecast for reserve services for 2012 at this time.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.95

**UIEC Data Request 1.95**

Please provide by year and by project how much the Company paid Bonneville Power Authority ("BPA") for wind integration costs associated with the Goodnoe and Leaning Juniper wind projects in 2009 and 2010, and how much the Company forecasts it will pay BPA for wind integration costs associated with those two project in 2011 and 2012?

**Response to UIEC Data Request 1.95**

The actual wind integration costs paid to BPA for Goodnoe Hills and Leaning Juniper in 2009 and 2010 were: \$1,943,055 and \$3,010,860, respectively. The charges for Goodnoe Hills and Leaning Juniper are prorated by their corresponding capacities of 94 MW and 100.5 MW, respectively. For the projected wind integration costs of these two wind facilities in the test period, please refer to Confidential Attachment R746-700-23.C.8 -1, specifically the file "UTGRCw\_Wheeling (Confidential).xlsx."

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UIEC Data Request 1.97

**UIEC Data Request 1.97**

Please provide for the years 2011 and 2012, the Company's forecasted costs for the short term firm ("STF") transactions that will be used for the actual hourly firm wholesale transactions used for wind integration balancing, and please provide by year for the years 2009 and 2010 the Company's actual costs, by transaction, for hourly firm wholesale transactions that were used for wind integration balancing.

**Response to UIEC Data Request 1.97**

Balancing transactions are driven by a wide variety of system variables, and the Company manages its balancing function from a system perspective. The Company does not "tag" specific balancing transactions as being used for wind integration balancing. Because of this, the Company does not have actual costs by hourly firm wholesale transaction that was used for wind integration balancing.

Forecasted wind integration system balancing costs are based upon the 2010 Wind Integration Study, which is available on the Company's website at:  
[http://www.pacificorp.com/content/dam/pacificorp/doc/Energy\\_Sources/Integrated\\_Resource\\_Plan/Wind\\_Integration/PacifiCorp\\_2010WindIntegrationStudy\\_090110.pdf](http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/Wind_Integration/PacifiCorp_2010WindIntegrationStudy_090110.pdf)

The system balancing wind integration costs measured in the 2010 Wind Integration Study capture day-ahead system balancing costs as described in section 3.3.3 beginning on page 21. Table 13 on page 33 shows that day ahead system balancing costs are \$0.86 (2011\$) per MWh of wind generation.

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UIEC Data Request 1.99

**UIEC Data Request 1.99**

Please provide, by wind project, the operating reserve requirement for each of the Company's wind projects for 2011 and 2012.

**Response to UIEC Data Request 1.99**

The Company does not forecast a contingency reserve requirement at the project level but does forecast the total contingency reserve requirement for wind by control area by month. The Company is required to carry 5% for contingency reserves for wind. Please refer to Attachment UIEC 1.99.

10-035-124/Rocky Mountain Power  
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UIEC Data Request 1.101

**UIEC Data Request 1.101**

Please provide, by year and by wind project, the prescheduling inter-hour costs incurred by the Company in 2009 and 2010, and please provide, by year and by wind project, the prescheduling inter-hour costs the Company forecasts that it will incur during 2011 and 2012.

**Response to UIEC Data Request 1.101**

The Company updated its wind integration study in September 2010. The 2010 Wind Integration Study is available at the following link:  
[http://www.pacificorp.com/content/dam/pacificorp/doc/Energy\\_Sources/Integrated\\_Resource\\_Plan/Wind\\_Integration/PacificCorp\\_2010WindIntegrationStudy\\_090110.pdf](http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/Wind_Integration/PacificCorp_2010WindIntegrationStudy_090110.pdf)

The 2010 Wind Integration Study does not measure prescheduling inter-hour costs as was done in the prior wind integration study. Consequently, the Company does not have any data for prescheduling inter-hour costs incurred in 2009 and 2010 or forecasts for prescheduling inter-hour costs in 2011 and 2012.

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March 1, 2011  
UIEC Data Request 1.102

**UIEC Data Request 1.102**

Please provide, by year and by wind project, the hour-ahead balancing inter-hour costs incurred by the Company in 2009 and 2010, and please provide, by year and by wind project, the hour-ahead balancing inter-hour costs the Company forecasts that it will incur during 2011 and 2012.

**Response to UIEC Data Request 1.102**

The Company updated its wind integration study in September 2010. The 2010 Wind Integration Study is available at the following link:  
[http://www.pacificorp.com/content/dam/pacificorp/doc/Energy\\_Sources/Integrated\\_Resource\\_Plan/Wind\\_Integration/PacifiCorp\\_2010WindIntegrationStudy\\_090110.pdf](http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/Wind_Integration/PacifiCorp_2010WindIntegrationStudy_090110.pdf)

The 2010 Wind Integration Study does not measure hour-ahead balancing inter-hour costs as was done in the prior wind integration study. Consequently, the Company does not have any data for hour-ahead balancing inter-hour costs incurred in 2009 and 2010 or forecasts for hour-ahead balancing inter-hour costs in 2011 and 2012.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.103

**UIEC Data Request 1.103**

Please provide, by year and by wind project, the regulation reserve costs incurred by the Company in 2009 and 2010, and please provide, by year and by wind project, the regulation reserve costs the Company forecasts that it will incur during 2011 and 2012.

**Response to UIEC Data Request 1.103**

The Company manages fluctuations in load and generation from a system perspective, and maintains sufficient regulating margin to allow the Company to meet or exceed NERC's Control Performance Criteria. From an operations perspective, the Company does not differentiate regulation reserves held for wind variability from regulation reserves held for other system variables such as load, let alone ascribe regulation reserve costs to specific wind projects. Because of this, the Company does not have actual regulation reserve costs by year and wind project in 2009 and 2010.

Similarly, on a forecast basis, the Company accounts for the incremental regulation reserve demand created by wind variability from a system perspective. Regulation reserve demand for individual wind projects, and consequently, regulation reserve costs for individual wind projects, are not calculated.

10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.104

**UIEC Data Request 1.104**

Please provide, by year and by wind project, the load following intra-hour costs incurred by the Company in 2009 and 2010, and please provide, by year and by wind project, the load following intra-hour costs the Company forecasts that it will incur during 2011 and 2012.

**Response to UIEC Data Request 1.104**

The Company manages fluctuations in load and generation from a system perspective, and maintains sufficient regulating margin to allow the Company to meet or exceed NERC's Control Performance Criteria. From an operations perspective, the Company does not differentiate load following reserves held for wind variability from load following reserves held for other system variables such as load, let alone ascribe load following reserve costs to specific wind projects. Because of this, the Company does not have actual load following reserve costs by year and wind project in 2009 and 2010.

Similarly, on a forecast basis, the Company accounts for the incremental load following reserve demand created by wind variability from a system perspective. Load following reserve demand for individual wind projects, and consequently, load following reserve costs for individual wind projects, are not calculated.



10-035-124/Rocky Mountain Power  
March 1, 2011  
UIEC Data Request 1.110

### UIEC Data Request 1.110

Which jurisdictions in PacifiCorp's service territory have binding renewable portfolio standards, which have non-binding renewable goals, and which have no renewable portfolio mandate?

### Response to UIEC Data Request 1.110

Among the states that regulate PacifiCorp, California, Oregon and Washington have mandatory renewable portfolio standards and Utah has adopted a voluntary renewable portfolio standard. The table below summarizes the state renewable portfolio standard goals.

State	Goal
California	Obtain 20 percent of electricity from renewable resources by 2010. Renewable procurement compliance obligation is increased to 33 percent by 2020.
Oregon	Obtain at least 25 percent of electricity sold by the utility to retail electricity consumers from qualifying electricity, as defined, by 2025 in the following increments: <ul style="list-style-type: none"><li>- 5 percent: 2011 through 2014</li><li>- 15 percent: 2015 through 2019</li><li>- 20 percent: 2020 through 2024</li><li>- 25 percent: 2025 and beyond</li></ul>
Utah	To the extent it is cost effective, by 2025, obtain 20 percent of annual adjusted retail sales from cost effective renewable resources, as determined by the Public Service Commission or renewable energy certificates.
Washington	Serve at least 15 percent of load from renewable resources and/or renewable energy credits by 2020 in the following increments: <ul style="list-style-type: none"><li>- 3 percent by January 1, 2012 through December 31, 2015</li><li>- 9 percent by January 1, 2016 through December 31, 2019</li><li>- 15 percent by January 1, 2020 and each year thereafter</li></ul>