

Exhibit L



201 South Main, Suite 2300
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March 10, 2011

***VIA EMAIL
AND OVERNIGHT DELIVERY***

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

Please find enclosed Rocky Mountain Power's Responses to UIEC 1st Set Data Requests 1.5-1.10, 1.12-1.17, 1.19-1.32, 1.35, 1.37, 1.40-1.41, 1.43, 1.46, 1.49, 1.50, 1.60, 1.80, 1.82, 1.83-1.90, 1.93-1.94, 1.96, 1.98, 1.100, 1.105-1.109, and 1.111. Provided on the enclosed CD are Attachments UIEC 1.20, 1.22, 1.23, 1.100, 1.105a, 1.105b, 1.105d, 1.105e, 1.106a, 1.107a, 1.107c and 1.108a. Provided on the enclosed Confidential CD are Confidential Attachments UIEC 1.46 and 1.50. 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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UIEC Data Request 1.5

UIEC Data Request 1.5

How is PacifiCorp recovering its stranded costs as a result of the reduction in Oregon's load?

Response to UIEC Data Request 1.5

The Company objects to providing the requested information on the basis it is based on an incorrect assumption and is not calculated to lead to discovery of admissible evidence.

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UIEC Data Request 1.6

UIEC Data Request 1.6

If any of the reduction of Oregon's load is attributable to movement of customers from bundled retail service to direct access service, is PacifiCorp allowed under Oregon law to recover its stranded costs from those customers?

Response to UIEC Data Request 1.6

The Company objects to providing the requested information on the basis that it calls for a legal conclusion.

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UIEC Data Request 1.7

UIEC Data Request 1.7

If PacifiCorp is allowed under Oregon law to recover its stranded costs from those customers who leave bundled service,

- a. Has PacifiCorp done so;
- b. How was the amount recoverable calculated in each case; and
- c. How much did PacifiCorp recover in each case?

Response to UIEC Data Request 1.7

The Company objects to providing the requested information on the basis that it calls for a legal conclusion.

10-035-124/Rocky Mountain Power
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UIEC Data Request 1.8

UIEC Data Request 1.8

What actions is PacifiCorp taking in its Oregon jurisdiction to retain load?

Response to UIEC Data Request 1.8

The Company has no control over its customers' energy demands.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.9

UIEC Data Request 1.9

What actions is PacifiCorp taking in its Oregon jurisdiction to increase load?

Response to UIEC Data Request 1.9

The Company has no control over its customers' energy demands.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.10

UIEC Data Request 1.10

Have the other electrical service providers in Oregon experienced any reduction in load during the comparable period over which PacifiCorp has experienced a reduction in its Oregon load?

Response to UIEC Data Request 1.10

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. Without waiving the objection, the Company is not aware of what other electrical service providers in Oregon have experienced or are experiencing.

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UIEC Data Request 1.12

UIEC Data Request 1.12

In Order No. 10-473 entered December 14, 2010, by the OPUC, reference is made to a credit of \$2.5 million to “resolve all issues” associated with the sale of Oregon-allocated RECs prior to January 1, 2010. Please provide a copy of the work papers showing how the \$2.5 million was calculated, with all formulas intact.

Response to UIEC Data Request 1.12

The Company objects to providing the requested information on the basis that it is not reasonably calculated to lead to admissible evidence.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.13

UIEC Data Request 1.13

Please provide and describe in detail all the underlying assumptions used to calculate the \$2.5 million calculated, including the detail of all the assumptions used to populate the model or spreadsheet upon which the \$2.5 million calculation is based.

Response to UIEC Data Request 1.13

The Company objects to providing the requested information on the basis that it will not lead to the discovery of admissible evidence.

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March 10, 2011
UIEC Data Request 1.14

UIEC Data Request 1.14

Please describe in detail all the “issues associated with the sale of Oregon-allocated RECS prior to January 1, 2010,” for which the \$2.5 million credit was meant to account.

Response to UIEC Data Request 1.14

The Company objects to providing the requested information on the basis that it will not lead to the discovery of admissible evidence.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.15

UIEC Data Request 1.15

Please explain why the “issues associated with the sale of Oregon-allocated RECs prior to January 1, 2010,” resulted in a \$2.5 million credit.

Response to UIEC Data Request 1.15

The Company objects to providing the requested information on the basis that it will not lead to the discovery of admissible evidence.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.16

UIEC Data Request 1.16

In Order No. 10-473 entered December 14, 2010, by the OPUC, reference is made to sales of Oregon-allocated RECs that are ineligible for compliance with Oregon's Renewable Portfolio Standard ("RPS"). Please explain:

- a. The magnitude in kilowatt-hours of these Oregon-allocated RECs that are ineligible for compliance with Oregon's RPS;
- b. Precisely why they are not eligible for compliance with Oregon's RPS;
- c. The units for measuring these Oregon-allocated RECs that are ineligible for compliance with Oregon's RPS;
- d. From what type of energy sources these ineligible RECs were derived;
- e. How PacifiCorp plans to sell them, or did sell them;
- f. PacifiCorp's current estimated value for them or received value for them; and
- g. How the revenue from the sales of these ineligible RECs was or will be accounted for.

Response to UIEC Data Request 1.16

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

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March 10, 2011
UIEC Data Request 1.17

UIEC Data Request 1.17

Please provide the work papers, with all formulas intact, upon which PacifiCorp has calculated a value for the Oregon-allocated RECs that are ineligible for compliance with Oregon's RPS, including the detail of all the assumptions used to populate the model or spreadsheet upon which the valuation is based.

Response to UIEC Data Request 1.17

- The value of RECs is booked as revenue only when sold.

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UIEC Data Request 1.19

UIEC Data Request 1.19

With respect to these Oregon-allocated RECs that are ineligible for compliance with Oregon's RPS, but which were, or are to be, sold, were they (or will they be):

- a. Accounted for in a balancing account separate from an energy cost adjustment mechanism; or
- b. Accounted for in an energy cost adjustment mechanism?

Response to UIEC Data Request 1.19

Consistent with Oregon Order No. 07-083, the Company books the Oregon-allocated gain from REC sales, net of transaction costs, to its Property Sales Balancing Account for refund to Oregon customers with interest accrual from the date of revenue receipt, utilizing the Commission-approved rate of return until amortization begins.

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UIEC Data Request 1.20

UIEC Data Request 1.20

With respect to these Oregon-allocated RECs that are ineligible for compliance with Oregon's RPS, but which were, or are to be, sold, please provide the work papers, with all formulas intact, establishing the amortization of the net proceeds from them. Please include the detail of all the assumptions used to populate the model or spreadsheet upon which the amortization calculation is based.

Response to UIEC Data Request 1.20

Oregon Advice No. 10-020 reinstated Schedule 96 to amortize the balance in the Oregon Property Sales Balancing Account over a 12-month period. The balance as of December 31, 2010 included \$3,992,178 of net proceeds from the 2010 sales of Oregon allocated RPS-ineligible renewable energy credits (RECs) in regulatory liability account 288180 and \$73,549 of gains on property sales regulatory liability account 288114. The amortization will be based on actuals from Schedule 96 and the amortization will be pro-rated between the Oregon-allocated REC's and gain on property sales. As of December 31, 2010 the split was Oregon allocated RECs at 98.2% and Oregon gain on property sales at 1.8%.

Please refer to Attachment UIEC 1.20 for Oregon Advice No. 10-020.

10-035-124/Rocky Mountain Power
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UIEC Data Request 1.21

UIEC Data Request 1.21

In Order No. 10-473 entered December 14, 2010, by the OPUC, reference is made to Pacific Power's Schedule 96 through which the net proceeds associated with sales of 2010 Oregon-allocated RPS-ineligible RECs are to be amortized. Please provide the work papers, with all formulas intact, supporting establishment of that Schedule 96 and provide an explanation as to how it was established. Please include the detail of all the assumptions used to populate the model or spreadsheet upon which the establishment of that Schedule is based.

Response to UIEC Data Request 1.21

The Company objects to the request on the basis that the tariff, which is publicly available on the Oregon Commission's website, speaks for itself and the request is not calculated to lead to discovery of admissible evidence. Without waiving the objection, please refer to the Company's response to UIEC Data Request 1.20.

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UIEC Data Request 1.22

UIEC Data Request 1.22

In Order No. 10-473 entered December 14, 2010, by the OPUC, reference is made to Pacific Power's functionalized marginal cost of service study on page 5 of the Order. Please provide

- a. A copy of that cost of service study;
- b. The work papers supporting the calculation of that cost of service study; and
- c. An explanation of the assumptions used in that cost of service study to calculate:
 - (i) Generation;
 - (ii) Transmission;
 - (iii) Distribution; and
 - (iv) Fuel;
- d. An explanation of the allocation factors used to develop that cost of service study; and
- e. An explanation of whether the cost of service study was based on historical information or forecasted information.

Response to UIEC Data Request 1.22

- a. Please refer to Attachment UIEC 1.22, part a.
- b. Please refer to Attachment UIEC 1.22, part b.
- c. An explanation of the derivation of marginal costs is provided in Attachment UIEC 1.22, part c and Attachment UIEC 1.23.
- d. Allocation factors are not employed in the marginal cost of service study.
- e. The cost of service study was based on the forecast test period ended December 31, 2011.

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UIEC Data Request 1.23

UIEC Data Request 1.23

With respect to Pacific Power's functionalized marginal cost of service study, which is referenced on page 5 of the OPUC Order No. 10-473,

- a. How is this marginal cost of service study being used in Oregon;
- b. For what is this marginal cost of service study being used in Oregon; and
- c. How are the marginal costs being reduced to the embedded costs?

Response to UIEC Data Request 1.23

- a. Attachment UIEC 1.23 contains the direct testimony of Company witness C. Craig Paice regarding development and use of marginal costs in the state of Oregon.
- b. Please refer to the Company's response to part a. above.
- c. Derivation of the embedded revenue requirement using marginal costs is explained in Attachment UIEC 1.23. Exhibits illustrating these calculations are provided in Attachment UIEC 1.22, part a.

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UIEC Data Request 1.24

UIEC Data Request 1.24

In Order No. 10-473 entered December 14, 2010, by the OPUC, reference is made to modification of Pacific Power's residential rates by moving the existing three-block rate to a two-block rate. Please provide

- a. An explanation as to why this modification was made;
- b. Copies of all studies relied on to support the modification; and
- c. An explanation of the effect on the peak load growth in Oregon that this modification is expected to have.

Response to UIEC Data Request 1.24

- a. The modification was made as part of the all-party stipulation in Docket UE-217 which was accepted by the Commission in Order No. 10-473.
- b. No studies were relied upon.
- c. No analysis was prepared.

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UIEC Data Request 1.25

UIEC Data Request 1.25

In Order No. 10-473 entered December 14, 2010, by the OPUC, in Exhibit D, reference is made to a "Transmission and Auxiliary Service Charge." Please explain:

- a. The basis for imposing this service charge;
- b. How this service charge is calculated;
- c. Whether and, if so, how this service charge changes over time; and
- d. The basis for the forecasted price of this service charge, including how it was derived.

Response to UIEC Data Request 1.25

The Company objects to this question on the basis that the order speaks for itself and the question is not calculated to lead to discovery of admissible evidence.

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UIEC Data Request 1.26

UIEC Data Request 1.26

Please explain whether the Transmission and Auxiliary Service Charge has any relationship to PacifiCorp's FERC Open Access Transmission Tariff ("OATT") rate, and if so,

- a. What that relationship is;
- b. Whether it is related to PacifiCorp's FERC OATT rate as currently filed;
- c. Whether it is related to PacifiCorp's FERC OATT rate as may be proposed;
- d. Whether it is related to PacifiCorp's FERC OATT rate as forecasted; and
- e. Whether it will change when PacifiCorp's FERC OATT rate changes.

Response to UIEC Data Request 1.26

The Company objects to the question on the basis that it is not calculated to lead to discovery of admissible evidence.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.27

UIEC Data Request 1.27

Please provide copies of the work papers, with all formulas intact, used to calculate the winter/summer differential in energy rates for each class for which such a differential exists. Please include the detail of all the assumptions used to populate the model or spreadsheet upon which the calculation for each differential is based.

Response to UIEC Data Request 1.27

The workpaper for Mr. Griffith's exhibits contained in the CD filed with the Utah Public Service Commission on February 4, 2011 has all the assumptions, formulas and detailed calculations of the proposed prices for all the tariff schedules in this case.

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UIEC Data Request 1.28

UIEC Data Request 1.28

Please provide a full explanation of all the assumptions used in the establishment of the winter/summer differential in energy rates for each class for which such a differential exists.

Response to UIEC Data Request 1.28

The workpaper for Mr. Griffith's exhibits contained in the CD filed with the Utah Public Service Commission on February 4, 2011 has all the assumptions, formulas and detailed calculations of the proposed prices for all the tariff schedules in this case.

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UIEC Data Request 1.29

UIEC Data Request 1.29

Were the class cost of service studies that were used to support the rate spread and rate design, which were accepted by the Oregon stipulation, based on historic data or forecasted data?

Response to UIEC Data Request 1.29

They were based on forecasted data. Please refer to the Company's response to UIEC Data Request 1.22(e).

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UIEC Data Request 1.30

UIEC Data Request 1.30

Does PacifiCorp provide electrical power to any customer classes in Oregon that do not have demand meters? If so, which classes do not have demand meters?

Response to UIEC Data Request 1.30

Customer groups which are not billed demand charges do not have demand metering installed. In Oregon, this would include single phase residential, lighting, and small (≤ 15 kW) general service customers.

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UIEC Data Request 1.31

UIEC Data Request 1.31

If PacifiCorp provides electrical power to any customer classes in Oregon that do not have demand meters, please provide in detail how PacifiCorp forecasts the consumption of electric power for each of these classes.

Response to UIEC Data Request 1.31

The Company relies on monthly billing sales data by customer class to develop its sales forecast by customer class.

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UIEC Data Request 1.32

UIEC Data Request 1.32

Please provide by year the total number of kilowatt-hours sold by PacifiCorp to its retail customers in Oregon during the years 2008, 2009, and 2010.

Response to UIEC Data Request 1.32

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.

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March 10, 2011
UIEC Data Request 1.35

UIEC Data Request 1.35

Please provide the total number of kilowatt-hours PacifiCorp expects to be required to generate, acquire or save from renewable energy systems, Green Tags, or White Tags® to comply with its Oregon RPS for 2011.

Response to UIEC Data Request 1.35

The estimated Oregon renewable portfolio standard renewable energy requirement for PacifiCorp in 2011 is approximately 667,700 megawatt-hours.

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

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March 10, 2011
UIEC Data Request 1.37

UIEC Data Request 1.37

Please provide by year for the years 2008, 2009, and 2010, the value PacifiCorp attributed to the number of kilowatt-hours PacifiCorp did generate, acquire or save from renewable energy systems, Green Tags, or White Tags®.

Response to UIEC Data Request 1.37

The value of RECs is booked as revenue only when sold.

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UIEC Data Request 1.40

UIEC Data Request 1.40

Please provide by year for the years 2008, 2009, and 2010, the value PacifiCorp attributed to the number of kilowatt-hours PacifiCorp carried forward as excess kilowatt-hours, indicating the amount from each separate year.

Response to UIEC Data Request 1.40

The value of RECs is booked as revenue only when sold.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.41

UIEC Data Request 1.41

Please provide the value of the total number of kilowatt-hours PacifiCorp expects to be required to generate, acquire or save from renewable energy systems, Green Tags, or White Tags® to comply with its Oregon RPS for 2011.

Response to UIEC Data Request 1.41

PacifiCorp ascribes no value to kilowatt-hours associated with compliance for Oregon's RPS.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.43

UIEC Data Request 1.43

Please provide the value of the total number of kilowatt-hours PacifiCorp expects to carry forward as excess kilowatt-hours after complying with its Oregon RPS for 2011.

Response to UIEC Data Request 1.43

The value of RECs is booked as revenue only when sold.

10-035-124/Rocky Mountain Power
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UIEC Data Request 1.46

UIEC Data Request 1.46

Please state for each month the amount of energy for January 2008 through December 2010 in kilowatt-hours produced by PacifiCorp or acquired by PacifiCorp under contract where PacifiCorp claims to own the Green Tags associated with the production of the energy.

Response to UIEC Data Request 1.46

Please refer to Confidential Attachment UIEC 1.46 that contains the estimate of REC (in megawatt-hours) from PacifiCorp owned or through contracts where PacifiCorp claims to own the RECs. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

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UIEC Data Request 1.49

UIEC Data Request 1.49

Of the Green Tags owned or acquired by PacifiCorp, please state 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 1.49

Please refer to Confidential Attachment UIEC 1.46 that contains the estimate of REC sales (in megawatt-hours) and retained (in megawatt-hours) where PacifiCorp claims to own the RECs. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.50

UIEC Data Request 1.50

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 those retained.

Response to UIEC Data Request 1.50

Please refer to Confidential Attachment UIEC 1.50 for monthly REC revenues booked for financial purposes. The value of RECs is booked as revenue only when sold. Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

10-035-124/Rocky Mountain Power
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UIEC Data Request 1.60

UIEC Data Request 1.60

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

Response to UIEC Data Request 1.60

The value of RECs is booked as revenue only when sold.

UIEC Data Request 1.80

Please provide a list of each wind resource placed into service in 2009 and 2010, including for each:

- a. Detailed information regarding how the generation step-up transformers ("GSU") at the generator are functionalized in the Company's inter-jurisdictional allocation methodology;
- b. Detailed information regarding how the GSUs at the generator are functionalized in the class cost of service study used by the Company in this filing;
- c. Detailed information regarding how the GSUs at the generator are allocated amongst classes in Utah by the Company in this filing;
- d. Detailed information regarding how the lines connecting the generator to the Company's substation are functionalized in the Company's inter-jurisdictional allocation methodology;
- e. Detailed information regarding how the lines connecting the generator to the Company's substation are functionalized in the class cost of service study used by the Company in this filing;
- f. Detailed information regarding how the lines connecting the generator to the Company's substation are allocated amongst classes in Utah by the Company in this filing;
- g. Detailed information regarding how the GSUs that are between the connecting lines to the Company's substation and the Company's substation are functionalized in the Company's inter-jurisdictional allocation methodology;
- h. Detailed information regarding how the GSUs that are between the connecting lines to the Company's substation and the Company's substation are functionalized in the class cost of service study used by the Company in this filing; and
- i. Detailed information regarding how the GSUs that are between the connecting lines to the Company's substation and the Company's substation are allocated amongst classes in Utah by the Company in this filing.

Response to UIEC Data Request 1.80

Following is a list of wind resources with in-service dates in 2009 and 2010:

Glenrock 3	39.00	01/17/09
Rolling Hills	99.00	01/17/09
Four Corners Windfarm	10.00	06/16/09
Four Mile Canyon Windfarm	10.00	06/16/09
Threemile Canyon Windfarm	9.90	06/19/09
High Plains	99.00	09/13/09
McFadden Ridge 1	28.50	09/29/09
Chevron Wyoming Wind (Casper Windfarm)	16.50	11/30/09
Three Buttes Windpower (Duke)	99.00	11/30/09

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UIEC Data Request 1.80

Pacific Canyon Windfarm	8.25	12/19/09
Dunlap	111.00	09/30/10
Top of World	200.20	10/01/10

- a. Generation step-up transformers (GSUs) at the generator are included in FERC account 345 – Accessory Electric Equipment and are functionalized to production and allocated using the system generation (SG) allocation factor in the Company’s inter-jurisdictional allocation model (JAM).
- b. GSUs referenced in item (a) are functionalized to production in the cost of service (COS) study.
- c. GSUs referenced in item (a) are allocated to customer classes in the COS study using allocation factor F10 (12CP-75% demand, 25% energy).
- d. Lines connecting the generator to the Company’s substation are included in FERC account 345 – Accessory Electric Equipment and are functionalized to production and allocated using the system generation (SG) allocation factor in the JAM.
- e. Lines referenced in item (d) are functionalized to production in the COS study.
- f. Lines referenced in item (d) are allocated to customer classes in the COS study using allocation factor F10 (12CP-75% demand, 25% energy).
- g. GSUs between the connecting lines to the Company’s substation are included in FERC account 353 and functionalized to transmission and allocated using the system generation (SG) allocation factor in the JAM.
- h. GSUs referenced in item (g) are functionalized to transmission in the COS study.
- i. GSUs referenced in item (g) are allocated to customer classes in the COS study using allocation factor F10 (12CP-75% demand, 25% energy).

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UIEC Data Request 1.82

UIEC Data Request 1.82

Please describe in detail by description and by dollar amount each disallowance that was made to a Company's request by the Idaho Commission in every rate setting context or case since January 2009.

Response to UIEC Data Request 1.82

Orders issued by the Idaho Commission in PacifiCorp's Idaho rate proceedings are available on the Idaho Public Utility Commission's website.

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UIEC Data Request 1.83

UIEC Data Request 1.83

Have any of the items that were disallowed and described in the previous data request been included in this Utah general rate case? If so, please provide a full explanation as to why the Company believes it is justified in including an item disallowed Idaho for recovery in Utah.

Response to UIEC Data Request 1.83

This analysis has not been prepared.

10-035-124/Rocky Mountain Power
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UIEC Data Request 1.84

UIEC Data Request 1.84

Please describe in detail by description and by dollar amount each disallowance that was made to a Company's request by the Oregon Commission in every rate setting context or case since January 2009.

Response to UIEC Data Request 1.84

Orders issued by the Oregon Commission in PacifiCorp's Oregon rate proceedings are available on the Oregon Public Utility Commission's website.

10-035-124/Rocky Mountain Power
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UIEC Data Request 1.85

UIEC Data Request 1.85

Have any of the items that were disallowed and described in the previous data request been included in this Utah general rate case? If so, please provide a full explanation as to why the Company believes it is justified in including an item disallowed Oregon for recovery in Utah.

Response to UIEC Data Request 1.85

This analysis has not been prepared.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.86

UIEC Data Request 1.86

Please describe in detail by description and by dollar amount each disallowance that was made to a Company's request by the Wyoming Commission in every rate setting context or case since January 2009.

Response to UIEC Data Request 1.86

Orders issued by the Wyoming Commission in PacifiCorp's Wyoming rate proceedings are available on the Wyoming Public Service Commission's website.

10-035-124/Rocky Mountain Power
March 10, 2011
UIEC Data Request 1.87

UIEC Data Request 1.87

Have any of the items that were disallowed and described in the previous data request been included in this Utah general rate case? If so, please provide a full explanation as to why the Company believes it is justified in including an item disallowed Wyoming for recovery in Utah.

Response to UIEC Data Request 1.87

This analysis has not been prepared.

10-035-124/Rocky Mountain Power
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UIEC Data Request 1.88

UIEC Data Request 1.88

Please explain in detail the specifics of the RPS Banking Requirements referenced by Mr. Bird on page 3 of his testimony.

Response to UIEC Data Request 1.88

The “RPS Banking Requirements” referenced in Mr. Bird’s testimony refer to the use of eligible renewable energy certificates that are generated and held for compliance to be used to meet the Company’s RPS compliance obligation in California, Oregon and Washington.

Please refer to the Company’s response to UIEC Data Request 1.110 for the state renewable portfolio standard goals.

10-035-124/Rocky Mountain Power
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UIEC Data Request 1.89

UIEC Data Request 1.89

Please provide a list of each action taken to balance the system for inter-hour wind integration, and for each, provide what percentage of the time the action is taken.

Response to UIEC Data Request 1.89

The Company takes the following actions to balance the system for inter-hour wind integration:

1. Long term wind generation forecast
2. Short term wind generation forecast
3. Day ahead forecast of reserve and regulation requirements, including regulating reserve for wind
4. Day ahead unit commitment for reserves and regulation
5. Day ahead balancing transactions (purchases and sells)
6. Next hour wind generation forecast
7. Next hour balancing transactions (purchases and sells)
8. Intra-hour generation unit dispatch in response to variation in generation and load
9. Intra-hour re-balancing transactions (purchases and sells) – rare
10. Intra-hour wind generation curtailment – rare

Actions 1 through 8 are taken each and every operational day. Though exact percentages are not available, the Company asserts that Actions 9 and 10 are taken rarely or less than ten percent of operational hours per year.

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UIEC Data Request 1.90

UIEC Data Request 1.90

Please provide the actual reserve intra-hour reserve requirement for wind generation in the PacifiCorp control area.

Response to UIEC Data Request 1.90

The Company does not calculate an actual intra-hour reserve requirement for wind generation.

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UIEC Data Request 1.93

UIEC Data Request 1.93

If the Company's OATT does not provide a mechanism for charging wholesale transmission customers for wind integration, please explain in detail why the Company has not previously filed before FERC for the inclusion of a wind integration charge.

Response to UIEC Data Request 1.93

FERC has not approved a standardized ancillary service schedule for wholesale wind integration service as part of the *pro forma* OATT. On November 18, 2010, FERC issued a notice of proposed rulemaking ("NOPR") on this subject, proposing to add an ancillary service rate schedule through which public utility transmission providers may offer generic regulation service to transmission customers delivering energy from a generator located within the transmission provider's balancing authority area. The NOPR proposes not to allow transmission providers to charge wind generators (or any other variable energy resource) for a different volume of regulating reserves based on output variability until such time as the transmission provider has adopted the reforms provided for in the NOPR (intra-hour scheduling and power production forecasting). Based on the recently-released NOPR, it is evident that the status of FERC's investigation into including wind integration charges in the OATT is in development while FERC formulates a final rule on this matter. The final rule is expected to provide the regulatory framework jurisdictional transmission providers must follow if they wish to pursue wind integration wholesale charges.

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UIEC Data Request 1.94

UIEC Data Request 1.94

What is the wind integration charge that the Company intends to propose in its upcoming FERC filing to be filed no later than June 1, 2011?

Response to UIEC Data Request 1.94

The Notice of Proposed Rulemaking lays out the path to follow to begin charging all wind generators, including non-owned facilities, for the costs incurred to integrate them into the Company's balancing areas. Pending any additional guidance from FERC on this issue, the Company believes that it can include a proposal for a new regulation service charge as part of the transmission rate case filing and that such a proposal has a higher chance of being accepted because of this recent guidance. The specific rate that will be filed has not yet been determined.

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UIEC Data Request 1.96

UIEC Data Request 1.96

Is it the Company's position that native load customers should be required to subsidize the costs of providing generator regulation service for wind generators? If so, please provide a detailed justification for your position. If not, please provide a detailed justification explaining why the Company has not previously filed with FERC for implementation of a wind integration charge.

Response to UIEC Data Request 1.96

Retail customers should pay for the cost of service incurred by the company in meeting its obligations to serve them and to maintain safe and reliable operation of the transmission system, including the cost for regulation service for network wind resources because those resources are used to support the network and to serve load. The provision of regulating reserves maintains transmission system balance and area control performance (ACE) by accounting for the moment to moment variations between energy and load. As such, this service is critical for safe operation of the transmission system, managing mandatory reliability standard control performance requirements, and for reliable load service. The majority of wind resources on PacifiCorp's transmission system are network resources. With respect to wind resources that are not PacifiCorp network resources, the Company has not previously filed with FERC for implementation of a wind integration charge because FERC has not approved a standardized ancillary service schedule for wholesale wind integration service as part of the *pro forma* OATT. Please refer to the Company's responses to UIEC Data Requests 1.93 and 1.94. Pending any additional guidance from FERC on this issue, the Company anticipates including a proposal for a regulation service charge as part of the transmission rate case to be filed around June 1, 2011.

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UIEC Data Request 1.98

UIEC Data Request 1.98

In its latest Integration Resource Plan (“IRP”), what cost did the Company calculate for wind integration balancing and what cost did the Company calculate for wind intra-hour integration?

Response to UIEC Data Request 1.98

The system balancing cost was estimated as \$0.86/MWh on a three-year levelized basis, corresponding to a wind penetration amount of 1,833 MW. The cost for operating reserves, which includes regulation and load following requirements, was \$8.85/MWh on a three-year levelized basis and wind penetration amount of 1,833 MW.

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UIEC Data Request 1.100

UIEC Data Request 1.100

Please provide a detailed description, including the type and the location, of each resource that the Company intends to use in 2011 and 2012 to provide a following service to wind resources.

Response to UIEC Data Request 1.100

Please refer to Attachment UIEC 1.100.

UIEC Data Request 1.105

For each jurisdiction in PacifiCorp's service territory, please describe:

- a. The size (in MWh) of the jurisdiction's current load at system peak;
- b. The size (in MWh) of the jurisdiction's load in 2009 at system peak;
- c. The size (in MWh) of the jurisdiction's load in 2010 at system peak;
- d. The size (in MWh) of the jurisdiction's forecasted load for 2011, by month at system peak;
- e. The size (in MWh) of the jurisdiction's forecasted load for 2012, by month at system peak;
- f. The magnitude and a detailed description of the cause of any change between (a) and (b);
- g. The magnitude and a detailed description of the cause of any change between (b) and (c);
- h. The magnitude and a detailed description of the cause of any change between (c) and (d) of this data request, including any and all assumptions made for the forecasts of (d);
- i. The magnitude and a detailed description of the cause of any change between (d) and (e) of this data request, including any and all assumptions made for the forecasts of (e).

Response to UIEC Data Request 1.105

- a. Please refer to Attachment UIEC 1.105a for the contribution to the 2010 system peak.
- b. Please refer to Attachment UIEC 1.105b for the contribution to the 2009 system peak.
- c. Please refer to the Company's response to part (a) above.
- d. Please refer to Attachment UIEC 1.105d for the monthly contribution to the 2011 system peak.
- e. Please refer to Attachment UIEC 1.105e for the monthly contribution to the six months of 2012 test period system peak.
- f. Please note that the data in Attachments UIEC 1.105a and UIEC 1.105b are not weather normalized. Therefore weather, in addition to load changes and actual curtailment at the time of system peaks coincident peak, will contribute to differences.
- g. Please refer to the Company's response to (f) above.
- h. Please note that the data in Attachment UIEC 1.105a is not weather normalized. Therefore weather, in addition to load growth and actual

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curtailment at the time of system peaks coincident peak, will contribute to differences. For a list of assumptions, please refer to pages 5 and 6 of Dr. Eelkema's testimony.

- i. The change in the data in the Company's response to (d) and (e) above is driven by load growth. There are no changes in assumptions.

UIEC Data Request 1.106

For each customer class in each jurisdiction in PacifiCorp's service territory, please describe:

- a. The size (in MWh) of each customer class load in 2009 at system peak;
- b. The size (in MWh) of each customer class load in 2010 at system peak;
- c. The size (in MWh) of each customer class forecasted load for 2011, by month at system peak;
- d. The size (in MWh) of each customer class forecasted load for 2012, by month at system peak;
- e. The magnitude and a detailed description of the cause of any change between (a) and (b) of this data request;
- f. The magnitude and a detailed description of the cause of any change between (b) and (c) of this data request, including any and all assumptions made for the forecasts of (c);
- g. The magnitude and a detailed description of the cause of any change between (c) and (d) of this data request, including any and all assumptions made for the forecasts of (d).

Response to UIEC Data Request 1.106

- a. Refer to Attachment UIEC 1.106a.
- b. Refer to Attachment UIEC 1.106a.
- c. Refer to Attachment UIEC 1.106a.
- d. Refer to Attachment UIEC 1.106a.
- e. Class load estimates are prepared in response to specific filing requirements. As such, continuous class load data is not available for each jurisdiction.

Utah – The requested comparison cannot be made as actual load estimates were not prepared for the first 6 months of 2009 or the last 6 months of 2010.

Oregon – Comparison can only be made for the first 6 months of 2009 vs. the first 6 months of 2010. For all rate classes listed, average demand was higher in 2009 than in 2010, primarily driven by January and March usage.

Idaho – Overall average total demand increased about 6.2% between 2009 and 2010, largely driven by the Large General Service class, which experienced a 29.4% increase. The large estimate of irrigation demand in June 2009 is considered a bad estimate which was a result of the estimation process employed at the time.

Washington – Estimates for calendar year 2010 were not prepared so the requested comparison cannot be made.

Wyoming - the requested comparison cannot be made as actual load estimates were not prepared for the first 6 months of 2009 or the last 6 months of 2010.

California – No California rate cases have been filed which would require the use of either 2009 or 2010 data. As such, these loads have never been prepared or summarized.

- f. Class load estimates are prepared in response to specific filing requirements. As such, continuous class load data is not available for each jurisdiction.

Adjusting historical class load estimates to forecast levels involves ratioing historical energy estimates to forecast levels. For all jurisdictions in which forecast data is prepared, this is the basic, underlying adjustment process.

Utah – Calendar year 2011 forecast estimates are based on the historical time period July 2009 through June 2010. The overall difference reveals an 18% increase in forecast usage, primarily driven by the residential class (18.6%) and Special Contract loads (15.6%). After the adjustment of historical load estimates to forecast level, these 2011 loads went through a calibration process as recommended by the Utah Load Research Working Group. This process and specific adjustments are described in lines 206 through 290 of Scott Thornton's pre-filed testimony.

Oregon – 2011 forecast class load estimates are based on the base year July 2009 through June 2010. The process for preparing the estimates is described, briefly, in the Company's paragraph 2 above. Forecast loads for 2011 are 4% less than base year loads. This decrease is driven by a forecast 9.2% decrease in residential usage and a 6.9 % decrease in large general service usage. Calibration is not performed in the state of Oregon.

Idaho – No 2011 class load forecast has been prepared for the state of Idaho.

Washington - No 2011 class load forecast has been prepared for the state of Washington.

Wyoming - Calendar year 2011 forecast estimates are based on the historical period July 2009 through June 2010. The process for preparing the estimates is described above. Forecast loads for 2011 are 5.1% greater than base year loads. This increase is primarily driven by a forecast 6%

increase in large general service usage, although all classes except irrigation were forecasted to increase. Calibration is not performed in the state of Wyoming.

California – No California Rate Cases have been filed which would require the use of either 2010 or 2011 data. As such, these loads have never been prepared or summarized.

- g. Class load estimates are prepared in response to specific filing requirements. As such, continuous class load data is not available for each jurisdiction.

Utah – Class load estimates for both 2011 and 2012 are based on the historical time period July 2009 through June 2010. Forecast class load estimates have only been prepared for the first 6 months of 2012. As such, a comparison can only be made against the first 6 months of 2011. The data indicates that 2012 forecast load data are 4.2% greater in 2012 than the similar period in 2011. This increase is primarily driven by the small (6.6%) and large (6.5%) general service classes. There is no calibration between one set of forecast loads and another. As such, any calibration adjustments of 2012 forecast estimates are not presented.

Oregon – Class load estimates for both 2011 and 2012 are based on the historical time period July 2009 through June 2010. A comparison of these two years indicates that 2012 forecast load data are 7.6% greater than in 2011. This increase is primarily driven by the residential (12.1%) and large (23.9%) general service classes. All other classes are forecast to decrease between 2011 and 2012.

Idaho – No 2012 class load forecast has been prepared for the state of Idaho.

Washington - No 2012 class load forecast has been prepared for the state of Washington.

Wyoming - No 2012 class load forecast has been prepared for the state of Wyoming.

California – No California Rate Cases have been filed which would require the use of either 2011 or 2012 data. As such, these loads have never been prepared or summarized.

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UIEC Data Request 1.107

UIEC Data Request 1.107

For each jurisdiction in PacifiCorp's service territory, please provide:

- a. The rate of load growth the Company forecasted for each of the last five (5) years;
- b. Any and all assumptions made by the Company to make that load growth forecast in each of the last five years; and
- c. The actual load growth for each of the last five years.

Response to UIEC Data Request 1.107

- a. Please refer to Attachment UIEC 1.107a.
- b. Forecasts prior to the 2009 GRC forecast were based on methodologies developed by the Company. The Company has not kept a record of specific assumptions used to develop forecasts prior to the 2009 GRC. The 2009 GRC forecast was based on the Itron methodology; a list of assumptions includes:
 - Analyses were performed and adjustments made for impact of current economic conditions.
 - Load research data was used to model weather impact on monthly retail sales and peaks by state by class.
 - Time period used to define normal weather was 20-year-period 1988-2007.
 - System line losses were updated.
 - Historical data period used to develop monthly retail sales forecasts was 1997-2007.
- c. Please refer to Attachment UIEC 1.107c.

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UIEC Data Request 1.108

UIEC Data Request 1.108

For each jurisdiction in PacifiCorp's service territory, please provide:

- a. The rate of load growth the Company forecasts for 2011 and 2012; and
- b. Any and all assumptions made by the company to make that load growth forecast for 2011 and 2012.

Response to UIEC Data Request 1.108

- a. Please refer to Attachment UIEC 1.108a.
- b. Please refer to Dr. Peter C. Eelkema's testimony, lines 98 to 118.

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UIEC Data Request 1.109

UIEC Data Request 1.109

For the rate of growth forecasted for 2011 and 2012 for each jurisdiction in PacifiCorp's service territory, please provide any and all assumptions made in deriving that rate of growth.

Response to UIEC Data Request 1.109

Please refer to Dr. Peter C. Eelkema's testimony, lines 98 to 118.

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UIEC Data Request 1.111

UIEC Data Request 1.111

Does the Company have an estimate for which the stand-by reserves required by wind power increase the real cost of wind power? If so, please state what that is.

Response to UIEC Data Request 1.111

No.