



January 6, 2014

#### VIA E-MAIL AND US MAIL

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

Attention:

Gary Widerburg

Commission Secretary

Re: FERC Docket No. ER14-835-000—PacifiCorp Cost-Based Rate Schedule

PacifiCorp participates as a seller in the western wholesale energy markets under authorization granted it by the Federal Energy Regulatory Commission (FERC) in its Volume No. 12 market-based rate authority. In contrast, wholesale energy sales by NV Energy in the Nevada Power Company and Sierra Pacific Power Company balancing authority areas must be made in accordance with its FERC-filed cost-based rate. When NV Energy became a PacifiCorp affiliate through common control by MidAmerican Energy Holdings Company on December 19, 2013, NV Energy's cost-based rate restriction also became applicable to PacifiCorp for its sales in the Nevada Power Company and Sierra Pacific Power Company balancing authority areas. In order to facilitate such sales, on December 24, 2013, PacifiCorp filed with the FERC a proposed cost-based rate schedule.

As noted in the attached FERC filing, PacifiCorp's proposed cost-based rate schedule will act as an amendment to the WSPP Schedule Q, establishing a mechanism to allow PacifiCorp to negotiate rates for short-term transactions up to the ceiling rates set forth therein. Service under this schedule is voluntary and available to wholesale customers located within the areas subject to the NV Energy cost-based rate. The proposed cost-based rate schedule was developed consistent with FERC precedent.

Informal questions should be directed to Dave Taylor, Manager, Utah Regulatory Affairs, at (801) 220-2923.

K-Lun/PBD

Sincerely.

Jeffrey K. Larsen

Vice President, Regulation and Government Affairs

**Enclosures** 

# **GIBSON DUNN**

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December 24, 2013

Ms. Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

> Re: PacifiCorp, Docket No. ER14-\_\_\_\_-000 Cost-Based Rate Schedule

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act, 16 U.S.C. § 824d, and Part 35 of the regulations of the Federal Energy Regulatory Commission (the "Commission" or "FERC"), 18 C.F.R. Part 35, PacifiCorp hereby submits for filing with the Commission an application for a Cost-Based Rate Schedule ("CB Rate Schedule") for PacifiCorp. Once accepted, this CB Rate Schedule will apply, among other things, to sales by PacifiCorp to its affiliates Nevada Power Company ("Nevada Power") and Sierra Pacific Power Company ("Sierra Pacific," and together with Nevada Power, the "NVE Utilities").

Upon acceptance by the Commission of this stand-alone CB Rate Schedule, this CB Rate Schedule will be submitted to WSPP, Inc., so that it can be included in Schedule Q of the WSPP Agreement. As authorized by past Commission orders, once the stand-alone rate schedule is accepted by the Commission, PacifiCorp will request WSPP, Inc. to submit a ministerial filing to revise the WSPP Agreement to incorporate this rate schedule into Schedule Q of the WSPP Agreement, with an effective date as of the date that the Commission accepts PacifiCorp's stand-alone CB Rate Schedule. In order to permit potential customers the ability to make purchases under the CB Rate Schedule as soon as possible, PacifiCorp respectfully requests waiver of the Commission's prior notice filing requirement to make the proposed CB Rate Schedule effective December 25, 2013 (i.e., one day after the date of filing).

See, e.g., Western Systems Power Pool, 126 FERC ¶ 61,193 (2009).

# I. CORRESPONDENCE AND COMMUNICATIONS

All correspondence and communications concerning the above-captioned proceeding should be addressed to the following persons:<sup>2</sup>

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Assistant Corporate Secretary
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#### II. DOCUMENTS SUBMITTED WITH THIS FILING

This filing consists of:

• This Transmittal Letter;

jeff.erb@pacificorp.com

- Attachment A, clean rate schedule sheets (note that this is a new schedule and, therefore, no redlines are submitted with this filing);
- Attachment B, cost justification schedules for the Units Most Likely to Participate Methodology; and
- Attachment C, a list of PacifiCorp's principal wholesale customers that would
  potentially take service under the proposed CB Rate Schedule once it is incorporated
  into Schedule Q of the WSPP Agreement.

# III. THE DATE ON WHICH PACIFICORP REQUESTS THE TARIFF SHEETS BECOME EFFECTIVE

PacifiCorp respectfully requests that the proposed CB Rate Schedule become effective on December 25, 2013 (i.e., one day after the date of filing). PacifiCorp is filing this CB Rate Schedule to enable short-term sales by PacifiCorp in the Nevada Power and Sierra Pacific balancing authority areas ("BAAs") now that PacifiCorp is an affiliate of Nevada Power and Sierra Pacific. PacifiCorp requests that this CB Rate Schedule become effective December 25, 2013 to enable PacifiCorp to make any needed sales in the Nevada Power and Sierra Pacific

PacifiCorp requests a waiver of Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203(b)(3) (2013), to the extent necessary to permit more than two persons to be included on the official service list on their behalf in this proceeding.

BAAs to meet needs in those BAAs at cost-based rates at the earliest possible date following this filing.

# IV. THE NAMES AND ADDRESSES OF THOSE TO WHOM THIS FILING HAS BEEN SENT

Pursuant to Section 35.2(e) of the Commission's regulations, PacifiCorp is serving a copy of this filing to those listed below.

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A copy of this filing has also been sent to PacifiCorp's principal wholesale customers for which cost-based sales under these rate schedules would be applicable upon ultimate incorporation into Schedule Q of the WSPP Agreement, as listed in Attachment C. A copy of this filing has also been sent to WSPP, Inc.

#### V. BACKGROUND

The proposed CB Rate Schedule would establish an "up to" cost-based rate platform for short-term wholesale power sales that is comparable in all material respects to other such rate schedules that have been accepted by the Commission. PacifiCorp does not presently have on file "up to" cost-based rates for sales under the WSPP Agreement. Thus, the proposed CB Rate Schedule will not supersede, supplement, or otherwise change the provisions of any rate schedule now on file for PacifiCorp.

Historically, PacifiCorp has had market-based rate ("MBR") authority for wholesale sales in all BAAs, including the BAAs operated by Nevada Power and Sierra Pacific. However, on December 19, 2013, MidAmerican completed its previously announced merger of NV Energy, Inc. ("NVE"), the parent company of Nevada Power and Sierra Pacific, and Silver Merger Sub, Inc., a subsidiary of MidAmerican (the "NVE Merger"). The NVE Merger was approved by the Commission under Section 203 of the Federal Power Act by order dated December 19, 2013.<sup>3</sup> Following the NVE Merger, NVE became an indirect wholly owned subsidiary of MidAmerican and PacifiCorp became affiliated with each of Nevada Power and Sierra Pacific. Neither Nevada Power nor Sierra Pacific has market-based rate authority for wholesale sales within its own BAA, and each of the NVE Utilities has restrictions in its own MBR tariff to mitigate market-based rate sales in its own BAA. Accordingly, PacifiCorp filed amendments to its MBR Tariff on December 20, 2013, to adopt restrictions on market-based rate sales in the NVE Utilities' BAAs (the "Mitigated Areas").<sup>4</sup>

Once PacifiCorp's MBR Tariff amendments are approved by the Commission, PacifiCorp will not have market-based rate authority for wholesale sales within the Mitigated Areas of its new affiliates Nevada Power and Sierra Pacific. Furthermore, effective on the closing of the merger, PacifiCorp is no longer making MBR sales to Nevada Power and Sierra Pacific under its MBR Tariff. The CB Rate Schedule will allow PacifiCorp the opportunity to make short-term wholesale sales to Nevada Power, Sierra Pacific, and other entities within the Mitigated Areas under the WSPP Agreement, capped at a cost-based rate ceiling.

#### VI. BASIS FOR CB RATE SCHEDULE

The CB Rate Schedule would apply to voluntary, short-term (less than one year) wholesale sales of power. It would allow PacifiCorp to negotiate rates for short-term transactions up to the ceiling rates set forth therein. The Commission has held that sellers have

See Silver Merger Sub, Inc., et al., 145 FERC ¶ 61,261 (2013) ("NVE Merger Order").

See MidAmerican Energy Co., et al., Docket No. ER14-725-000, et al., Amendments to Market-Based Rate Tariffs (filed Dec. 20, 2013).

flexibility in designing ceiling rates under cost-based tariffs.<sup>5</sup> The rate cap proposed under the CB Rate Schedule includes a capacity (demand) charge calculated using a well-established methodology – the *Units Most Likely To Participate* stacking methodology. The demand rate cap is accompanied by an energy charge of up to 110 percent of PacifiCorp's variable cost, which is the standard energy charge for cost-based rate caps of this nature.

The rate schedule, rate design and cost justification for the CB Rate Schedule is consistent with similar cost-based rate tariffs (and associated evidentiary submissions) accepted for filing by the Commission.<sup>6</sup> The CB Rate Schedule reflects the Commission's longstanding practice of permitting cost-based (cost-justified) rate ceilings that include a contribution to seller's fixed costs for transactions of less than one year.<sup>7</sup>

See e.g., Illinois Power Co., 57 FERC ¶ 61,213, at p. 61,699 (1991) ("Illinois Power") (explaining that the Commission's "approach to pricing of off-system sales is not that inflexible. Many pricing structures for off-system sales are acceptable."); Consumers Energy Co., 80 FERC ¶ 61,283, at p. 62,009 (1997) (citing Illinois Power); Detroit Edison Co., 78 FERC ¶ 61,149, at p. 61,628 (1997) (citing Illinois Power).

See Westar Energy, Inc., Letter Order in Docket No. ER11-3233-000 (issued May 26, 2011) (accepting cost-based rate schedule for Schedule Q of the WSPP Agreement); Nevada Power Co. and Sierra Pacific Power Co., 133 FERC ¶ 61,005 (2010) and Nevada Power Co., Letter Order in Docket No. ER11-1832-000 (issued Nov. 23, 2010) (accepting cost-based rate schedule for Schedule Q of the WSPP Agreement). See also Arizona Public Service Co., Letter Order in Docket Nos. ER07-23-000 and ER07-23-001 (issued Dec. 6, 2006) (accepting cost-based rate schedule for Schedule Q of the WSPP Agreement); Carolina Power & Light Co., 113 FERC ¶ 61,130, P 23 (2005) ("CP&L's proposal to base its capacity ceiling rates for short-term power sales, including sales of one week or less, on the embedded costs of the CP&L units that are most likely to be used to provide the service is sufficiently supported and consistent with Commission precedent); MidAmerican Energy Co., 114 FERC ¶ 61,280, PP 15, 18 (2006) (mandating cost-based rates), 117 FERC ¶ 61,178 (approving cost-based rates); Duke Power, a Division of Duke Energy Corporation, 113 FERC ¶ 61,192 (2005), 115 FERC ¶ 61,042 (2006); AEP Power Marketing, Inc., et al., 112 FERC ¶ 61,047, 113 FERC ¶ 63,027 (2005), and Letter Order in Docket Nos. ER96-2495-026, et seq.; and Southern Energy Services, Inc., 125 FERC ¶ 61,393 (2008).

See, e.g., Western Systems Power Pool, 122 FERC ¶ 61,139, at P 31 (2008). See also Detroit Edison Co., 78 FERC ¶ 61,149, at pp. 61,268-69 (accepting tariff permitting rate negotiations under cost-based ceilings provided for demand and energy charges for hourly, daily, weekly, and monthly transactions); Illinois Power, 57 FERC ¶ 61,213, at p. 61,699 (explaining that "the Commission allows utilities to include in their rates an amount above incremental costs to provide a contribution to fixed costs. Utilities use this margin to reduce the rates of system customers who have already paid the costs of the generating resources."); Florida Power & Light Co., 33 FERC ¶ 61,116, at p. 61,248 (1985) (explaining that "[t]he Commission will generally permit rates for coordination services to recover, in addition to variable costs, an amount up to the contribution to fixed costs that would have been made by requirements customers using the same facilities."); Wisconsin Public Service Corp., 25 FERC ¶ 61,101, at p. 61,325 (1983) (concluding that while interruptible loads do not require "capacity additions, they nevertheless benefit from the existing capacity and should pay a portion of its costs.")

# VII. SUMMARY OF SERVICES, RATES, AND CHARGES

The CB Rate Schedule for PacifiCorp is attached hereto as Attachment A. Service under the CB Rate Schedule is voluntary and will be available to wholesale customers located within the Mitigated Areas. Any agreement under the proposed CB Rate Schedule would be limited by its terms to transactions with a term of less than one year. The CB Rate Schedule would permit PacifiCorp to charge rates for short-term transactions up to a ceiling rate. The ceiling rate in the CB Rate Schedule is the sum of a demand charge, an energy charge, and transmission expenses incurred directly in connection with a transaction.

### A. Demand Component of Rate

The demand component of the ceiling rate in the CB Rate Schedule is determined using the *Units Most Likely to Participate Methodology* (Attachment B).

The Fixed Charge Rate developed for PacifiCorp (Attachment B) uses the FERC standard methodology and 2012 actual costs primarily from PacifiCorp's FERC Form 1, as shown in Attachment B. The Rate of Return on Equity ("ROE") employed in the capital structure is 9.8%. This ROE is a system-weighted average of the ROEs approved and authorized by the six state utility commissions that regulate PacifiCorp, as shown in Attachment B. The use of this ROE is appropriate for this filing and will help to expedite the review and approval process and eliminate the need to undertake a costly ROE study. Other data used to develop the rate comes primarily from PacifiCorp's FERC Form 1.

For the Units Most Likely to Participate Methodology, the demand component of the ceiling rate in the CB Rate Schedule is based on the weighted cost of the PacifiCorp generation resources that are deemed likely to participate in the sales transactions, as established pursuant to the Commission's well-established methodology. To determine these "likely resources," PacifiCorp performed a "stacking analysis" under which generating resources are stacked in ascending order based on fuel costs per MWh. The resources located in the stack between the minimum and maximum monthly PacifiCorp peak loads are selected as the likely resources.

The total annual cost (in \$/kW) of each likely resource was then calculated by applying a fixed charge rate to the resource's installed costs per kW, and adding the actual fixed operation and maintenance expenses per kW for each resource. The available capacity for each likely resource was determined by subtracting the resource's capacity factor, or "Plant Factor," from its availability factor and multiplying by the resource's nameplate capacity. The annual charges for each of the likely resources are weighted by the amount of available capacity from each resource to arrive at the total demand charge.<sup>8</sup>

For purchased resources, the purchased capacity (kW) was used as the nameplate capacity, the energy charges per MWh were used to include the resource in the stack, and the demand charges per kW were used as the total annual cost in \$/kW.

The calculation details and cost data supporting the development of the fixed charge rate and the weighted costs of the selected units-most-likely are provided in Attachment B of this filing and are consistent with the Commission's stack analysis calculation spreadsheet available on the Commission's website. The data used in Attachment B are actual costs that come primarily from PacifiCorp's 2012 FERC Form 1, as shown in Attachment B.

## B. Energy Component of Rate

The energy component of the ceiling rate is based on incremental cost principles and provides compensation for out-of-pocket System Incremental Costs that would not have otherwise been incurred, plus a 10 percent adder for difficult-to-quantify costs.<sup>10</sup>

System Incremental Costs means all reasonably forecasted costs of such power and/or energy and which otherwise would not have been incurred by PacifiCorp including, but not limited to, costs associated with fuel, labor, variable operation and maintenance, start-up, shutdown, fuel handling, taxes or other similar government impositions, regulatory commission charges, emission allowances, and other environmental compliance costs.

If PacifiCorp enters into purchased power transactions specifically for the purpose of reselling such power hereunder, the rates shall not exceed the sum of the following:

- (i) PacifiCorp's out-of-pocket costs of purchasing such capacity and/or energy, including all related charges incurred for transmission service, ancillary services, transmission losses, and any applicable taxes or other similar governmental impositions; and
- (ii) \$1.00 per megawatt-hour multiplied by the total megawatt hours scheduled.

# C. Transmission Component of Rate

The transmission component reflects a pass-through of transmission service charges directly incurred in connection with a given transaction. It includes all charges incurred for transmission service, ancillary services, and transmission losses.

# D. Summary of Rate Components

See Stacking of Generating Units to Determine the Units Likely to Participate in Short Term Power Sales, available at http://www.ferc.gov/industries/electric/gen-info/mbr.asp (under "Quick Links," follow "Blank Stack Analysis" hyperlink).

The Commission has consistently recognized that the 10 percent adder provides for "recovery of difficult-to-quantify costs for services that are provided on an intermittent basis." *MidAmerican Energy Co.*, 114 FERC ¶ 61,280, at P 37 & n. 36 (2006) (citing *PacifiCorp*, 54 FERC ¶ 61,296, at p. 61,853, reh'g denied, 55 FERC ¶ 61,461 (1991)).

In summary, the proposed ceiling rates for sales from PacifiCorp's generating resources under the CB Rate Schedule (as set forth in Attachment A) are the sum of:

- (i) a demand charge associated with the term of the transaction;
- (ii) 110 percent of the System Incremental Costs of a transaction; and
- (iii) out-of-pocket transmission expenses, including all charges incurred for transmission service, ancillary services, and transmission losses,

The hourly and daily demand charges are based on a sixteen-hour day and a five-day week. As a result, the maximum hourly and daily demand components are subject to the required daily and weekly rate caps.<sup>11</sup>

The proposed ceiling rate when power is purchased for resale under the CB Rate Schedule (as set forth in Attachment A) is the sum of:

- out-of-pocket costs of purchasing such capacity and/or energy plus a \$1.00 per megawatt-hour adder; and
- (ii) out-of-pocket transmission expenses, including all charges incurred for transmission service, ancillary services, and transmission losses.

# VIII. WAIVER OF FILING REQUIREMENTS

To the extent that this filing fails to contain any information otherwise required for technical compliance with the Commission's regulations, PacifiCorp respectfully requests that compliance with such regulations be waived.

#### IX. CONCLUSION

The proposed CB Rate Schedule (including the ceiling rates summarized above) have been developed in accordance with Commission precedent and are consistent in all material respects with comparable arrangements that have been accepted by the Commission as just and reasonable. Accordingly, PacifiCorp respectfully requests that the Commission accept the CB Rate Schedule, without suspension, hearing, condition, or modification, to be effective as of December 25, 2013.

It is not possible at this time to estimate with the requisite degree of accuracy the quantity of service or the resulting revenues that would be associated with this initial rate filing, and as a result no such estimates are provided with the attached submission. See 18 C.F.R. § 35.12(b)(1).

Thank you for your consideration of this matter. If you have any questions regarding the instant filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

William R. Hollaway, Ph.D.

Brandon C. Johnson

Jennifer C. Mansh

GIBSON DUNN & CRUTCHER, LLC

1050 Connecticut Ave., NW Washington, DC 20036-5306

Counsel for PacifiCorp

Enclosures

# **ATTACHMENT A**

Proposed New Cost-Based Rate Schedule for PacifiCorp

## COST-BASED RATE SCHEDULE FOR PACIFICORP

# Determination of Ceiling Rates Applicable to Cost-Based Sales Made by PacifiCorp

- 1. The following rates shall be applicable to any cost-based sale of power and/or energy made by PacifiCorp (1) pursuant to the applicable terms and conditions of the WSPP Agreement, including under Service Schedule A (Economy Energy Service), Service Schedule B (Unit Commitment Service), and Service Schedule C (Firm Capacity/Energy Sale or Exchange Service), (2) at a delivery point located within the Nevada Power Company balancing authority area or the Sierra Pacific Power Company balancing authority area, and (3) for a term of less than one year.
- 2. The rates for any cost-based power and/or energy sale made by PacifiCorp pursuant to the applicable terms and conditions of the WSPP Agreement from PacifiCorp's generating resources shall not exceed the following:
  - (i) Maximum Demand Charge:

The Maximum Demand Charge shall be capped using the following methodology:

Units Most Likely	To Particip	ate Methodology
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Monthly Up to \$11,317/MW Weekly Up to \$2,612/MW

Daily Up to \$522/MW, provided, however, that the Daily rate of

\$522/MW shall not exceed the product of the number of kilowatts sold for a week multiplied by the maximum weekly demand charge

of \$2,612/MW.

Hourly Up to \$32.64/MW, provided, however, that the hourly rate of

\$32.64/MW shall not exceed the product of the number of

kilowatts sold for a day multiplied by the maximum daily demand

charge of \$522/MW, and also not exceed the product of the number of kilowatts sold for a week multiplied by the maximum

weekly demand charge of \$2,612/MW.

- (ii) Energy Charge of 100% of SIC, plus up to 10% of SIC; and
- (iii) All charges incurred for transmission service, ancillary services, and transmission losses.
- 3. If PacifiCorp enters into a purchased power transaction specifically for the purpose of reselling such power hereunder, the rates shall not exceed the sum of the following:

- PacifiCorp's out-of-pocket costs of purchasing such capacity and/or energy, including all related charges incurred for transmission service, ancillary services, transmission losses and any applicable taxes or other similar governmental impositions; and
- (ii) \$1.00 per megawatt-hour multiplied by the total megawatt-hours scheduled.
- 4. System Incremental Costs ("SIC") means all reasonably forecasted costs of such power and/or energy and which otherwise would not have been incurred by PacifiCorp including, but not limited to, costs associated with fuel, labor, variable operation and maintenance, start-up, shut-down, fuel handling, taxes or other similar governmental impositions, regulatory commission charges, emission allowances and other environmental compliance costs.
- Purchasers in cost-based transactions shall also be responsible for any taxes, purchased power costs, and for any other costs incurred by PacifiCorp in fulfilling its obligations for the provision of power and/or energy under the WSPP Agreement, which cost would otherwise not have been incurred, had such service not been provided.

# ATTACHMENT B

**Cost Justification Schedules** 

(Based on FERC Form No. 1 Data from 2012)

#### III) Calculate weighted annual cost and rates for the participating generating plants - FERC Stack.

(1)	(2)	= 2	(3)	(4)	(5)		(6)		(7)	(8) Fixed	W	(9) Veighted	
Plant	Plant		Available	Cumulative	Expected	1	Installed	Op	eration and	Charge Rate		Annual	
No.		EAF <sup>3</sup>	Capacity <sup>2</sup>	Avail, Cap.	Ptcp.	(	Cost/kW	M	aintenance	(FCR = 1 for PP)		mand Cost	
1	Cholla	89%	61,597	61,597	0.1037	\$	1,275	\$	38.98	0.1139	s	21.35	
2	Jim Bridger	88%	298,816	360,413	0.5030		692	\$	13.44	0.1139		52.91	
3	Portland General Electric Company	59%	-	360,413		\$	-	\$		1.0000		*1	
4	Hayden	90%	17,138	377,551	0.0288	\$	1,056	5	33.91	0.1139		4.97	
5	J Bar 9 Ranch, Inc.	8%		377,551		5		5		1.0000		-	
6	Tri-State Generation and Transmission Association, Inc.	84%	7,968	385,519	0.0134	\$	254	\$		1.0000		4.06	
7	Oregon State University	1%	*	385,519		\$		\$	-	1.0000	5		
8	Public Utility District No. 1 of Douglas County (s)	27%		385,519	(2)	\$		\$		1.0000	5		
9	Tesoro Refining and Marketing Company	11%		385,519	100	\$		\$	-	1.0000	5		
10	Kennecott Utah Copper LLC	16%	0.46	385,519		5		\$	100	1.0000	\$	*	
11	Wasatch Integrated Waste Management District	7%		385,519		\$	2	\$	-	1.0000	\$		
12	Rock River 1, LLC	31%		385,519		\$		\$	_	1,0000	\$	-	
13	Yakima-Tieton Irrigation District	49%		385,519	1 4	\$		5	5.00	1.0000	\$	-	
14	Harold Foster & Robert Walker	49%		385,519	-	\$		\$	-	1.0000	\$	-	
15	Sunnyside Cogeneration Associates	92%	44.	385,519	-	\$	-	\$	2.0	1.0000	5		
16	US Magnesium LLC	41%		385,519	74.7	\$		\$		1.0000	5		
17	Ballard Hog Farms Inc.	68%		385,519		5		\$		1.0000	\$		
18	RES Ag - Oak Lea LLC	68%		385,519	1 12	\$		\$		1.0000	\$		
19	City of Portland, Portland Water Bureau	19%	1 48	385,519	-	\$		\$	20	1,0000	\$	- 2	
20	Hermiston	94%	130,650	516,168	0.2199	\$	617	\$	33.22	0.1139	\$	24.29	
21	Idaho Falls, City of	35%		516,168	1 5	\$		\$	-	1.0000	\$		
22	Hermiston Generating Company, LP.	94%	77,957	594,125	0.1312	\$	162	\$		1,0000	\$	22.67	
23	Roseburg Forest Products Company	14%		594,125	2	\$	9	\$		1.0000	\$		
							Subto	otal \	Weighted An	nual Demand Cost	\$	130.25	
										Losses (4.26%)	5	5.55	
							Total Weighted Annual Demand Cos				\$	135.80	
									Annua	al Demand Charge	\$	135,801	\$/N
									Monthl	y Demand Charge	\$	11,317	\$/N

Weekly Demand Charge \$

Daily Demand Charge \$

Hourly Demand Charge \$

2,612 \$/MW

32.64 \$/MW

522 \$/MW

Note 1 - 5-year average EAF of PacifiCorp owned generating resources from 2008 to 2012 PacifiCorp Equivalent Availability reports. EAF of dispatchable PPAs from NERC Generating Unit Statistical Brochu EAF of non-dispatchable resources is equal to the Plant Factor, resulting in zero available capacity.

Note 2 – Available capacity is determined as (EAF - PF) \* Name Plate Capacity of each unit. The sum of the max nameplate capacities of the units with Available Capacity is equal to 2,568 MW, while the band between the minimum and the maximum monthly peak loads, used for calculating the 'Units Most Likely' list, is 2,494 total MW.

(Based on FERC Form No. 1 Data from 2012)

#### 1) Stacking of generating plants according to fuel expense [col. (7)].

Min Monthly Peak 7537 Max Monthly Peak 9831

(1)	(2)	(3)	(4)	(5) Fuel Expense	(6) Generation	(7) Fuel Expense	(8) Max Name Plate Rating		(9) Accum. Name Plate	(10) Name Plate	(11) Plant	(12)
Plant	Plant	Plant Type	Total Cost	dollars	kWh	5/kWh	kW		Capacity	5/kW	Factor	Plant
No.		Plant Type <sup>1</sup>	(p402,17) <sup>2,6</sup>	(p402/3, 20) <sup>3, 6</sup>	(p402/3, 12) <sup>4</sup>	(5) / (6)	(p402/3, 5)		kW	(4) / (8)	1 2 2 2	(FERC Stack)
1	Ashton	H	35,512,686	19402/3/201	1,903,000	13/1/10/	6,700		6,700	5,300	0.0324	(CERC SLECK)
Z	Bend	н	1,335,093		3,344,000		1,110		7,810		0.3439	
3	Big Fork	н	7,373,547		33,426,000		4,150		200	1,203	0.3439	0
4	Black Cap	Solar	74,986		585,000		2,000		11,960 13,960	1,777		0
5	Blundeli	G	120,495,392		268,542,000		38,100	3	52,060	37	0.0334	0
6	Camas Co-Gen	S	34,450,540		78,036,000		61,500		113,560	3,163 560	0.3048	0
7	Clearwater No. 1	н	6,997,199		50,701,000		15,000		128,560	466	0.3859	0
8	Clearwater No. 2	н	18,503,724		54,153,000		26,000		154,560	712	0.3839	0
9	Copco No. 1	HS	9,941,054		85,352,000		20,000		174,560	497	0.4872	0
10	Copco No. 2	H	16,063,008		109,416,000		27,000		201,560	595	0.4626	0
11	Cutler	HS	30,236,233		50,408,000		30,000		231,560	1,008	0.1918	0
12	Dunlap Ranch 1	w	239,618,218		387,973,000		111,000	8	342,560	2,159	0.3990	0
13	Eagle Point	H	1,861,057		17,897,000		2,810		345,370	662	0.7271	0
14	East Side	н	1,991,695		17,037,000		3,200		348,570	622	0.7271	0
15	Fall Creek	H	1,395,011		10,432,000		2,200			634	0.5413	0
16	Fish Creek	н	15,759,774		42,829,000		11,000		350,770 361,770	1,433	0.4445	0
17	Foote Creek	W	36,515,908		85,137,000		32,150				0.3023	
18	Fountain Green	н	597,630		65,137,000		160	8	393,920	1,136		0
19	Glenrock	w	201,049,749		314,476,000				394,080	3,735	0.2525	0
20	Glenrock III	W	87,388,684		119,142,000		99,000	-8	493,080	2,031	0.3626	0
21	Goodnoe Hills	W	183,027,132				39,000	8	532,080	2,241	0.3487	0
22	Grace	HS	17,433,531		221,156,000		94,000	8	525,080	1,947	0.2686	0
23	Granite	Н	5,234,569		82,593,000 5,406,000		33,000 2,000		659,080	528	0.2857	0
24	GrowPro, Inc.	PP	3,234,369	12	5,405,000				661,080	2,617	0.3656	0
25	Gunlock	н	683,045	-12	1 480 000		76	7 8	561,156	214	0.0000	0
26	High Plains	w	219,515,480	-	1,489,000		750		661,906	911	0.2266	0
27	Iron Gate	HS	24,399,794	-	315,879,000 100,757,000		99,000	8	760,906	2,217	0.3642	0
28	JC Boyle	HS	34,068,973		240,436,000		18,000		778,906	1,356	0.6390	0
29	Last Chance	H	2,809,625		3,833,000	4	97,980 1,730		876,886 878,616	1,524	0.2801	0
30	Leaning Juniper 1	W	175,690,243		190,905,000		100,500	7.0	979,116		0.2529	0
31	Lemolo No. 1	HS	24,101,992	-	156,546,000		31,990	8		1,748 753		
32	Lemolo No. 2	н	48,897,523		207,037,000		38,500		1,011,106	1,270	0.5943	0
33	Marengo	W	239,478,535		358,669,000			- 0	1,049,606			
34	Marengo II	w					140,400	8	1,190,006	1,706	0.2916	0
35	McFadden Ridge I	w	129,148,793		177,552,000		70,200	В	1,260,206	1,840	0.2887	0
36	Merwin	HS	56,961,391		94,789,000	~	28,500	8	1,288,705	1,999	0,3797	0
37	Olmsted	H	83,539,418		657,225,000		136,000		1,424,706	614	0.5517	0
38	Oneida	HS	232,720		19,185,000		10,300		1,435,006	23	0.2126	0
39	Oregon Institute of Technology		13,917,934		32,971,000		30,000	_	1,465,006	464	0.1255	0
40	Paris	PP.			- 61.64	-		7 8	1,465,286	5.		0
41	Pioneer		432,494		2,434,000	-	720		1,466,006	501	0.3859	0
4Z	Prospect No. 1	8	11,000,932		15,091,000		5,000		1,471,006	2,200	0.3445	0
42		H	2,531,526	-	20,393,000		3,760		1,474,766	673	0.6191	0
	Prospect No. 2	,	40,002,547	-	238,047,000		32,000		1,506,766	1,250	0.8492	0
44	Prospect No. 3	е	8,343,868	-	37,518,000	-	7,200		1,513,966	1,159	0.5948	0
45	Prospect No. 4	H	2,365,524		3,833,000		1,000		1,514,966	2,366	0.4376	0
46	Rolling Hills	w	201,829,100		292,022,000	1.5	99,000	8	1,613,966	2,039	0.3367	0
47	Sand Cove	-8:	933.722	-	1,326,000		800		1,614,765	2,167	0.1892	0

(Based on FERC Form No. 1 Data from 2012)

#### 1) Stacking of generating plants according to fuel expense [col. (7)].

Min Monthly Peak 7337 Max Monthly Peak 9831

(1)	(2)	(3)	(4)	(5) Fuel Expense	(6) Generation	(7) Fuel Expense	(8) Max Name Plate Rating		(9) Accum. Name Plate	(10) Name Plate	(11) Plant	(12) Participating
Plant	Plant	Plant Type	Total Cost	dollars	kWh	5/kWh	kW		Capacity	\$/kW	Factor	Plant
No.		Plant Type <sup>1</sup>	(p402.17) <sup>2, 6</sup>	(p402/3, 20) <sup>3, 6</sup>	(p402/3, 12) <sup>4</sup>	(5) / (6)	(p402/3, 5)		kW	(4) / (8)	2-10	(FERC Stack) <sup>5</sup>
48	Seven Mile Hill	W	200,758,039	(19402/3, 20)	342,192,000	15//10/	99,000	3	1,713,766	2,028	0.3946	0
49	Seven Mile Hill II	w	42,010,209		72,558,000		19,500	8	1,733,266	2,154	0.4248	0
50	Slide Creek	н	25,929,627		96,627,000		18,000		1,751,266	1,441	0.6128	0
51	Soda	HS	14,970,992		20,023,000		14,000		1,765,266	1,069	0.1633	0
52	Soda Springs	HS	92,172,529		50,541,000		11,000		1,776,266	8,379	0.5245	0
53	St. Anthony	Н	1,337,279		30,342,000		500		1,776,766	2,675	0.5242	0
54	Stairs	H	1,626,626	2.	4,803,000		1,000		1,777,766	1,627	0.5483	0
55	Swift No. 1	HS	146,204,068	-	809,468,000		240,000		2,017,766	609	0.3850	0
56	Toketee	HS	17,907,710	9.1	253,788,000	-	42,500		2,060,266	421	0.7085	0
57	Veyo	н	893,125		1,030,000		500		2,060,766	1,786	0.2352	0
58	Wallowa Falis	н	2,887,127		5,611,000		1,100		2,051,856	2,625	0.5823	0
59	Weber	н	2,962,109		15,100,000		3,850		2,065,716	769	0.4477	0
60	West Side	н	468,574		1,810,000		600		2,066,316	781	0.3444	0
61	Yale	HS	60,995,100	-	702,744,000		134,000		2,200,316	455	0.5987	0
52	Wyodak	S	445,288,396	19,828,875	1,990,902,000	0.010	289,700		2,490,016	1,537	0.7845	.0
53	Dave Johnston	5	995,934,041	58,092,617	4,906,422,000	0.012	816,800		3,306,816	1,219	0.6857	0
64	Public Utility District No. 1 of Douglas County	pp	223,234,041	3,263,025	245,509,000	0.013	56,000		3,362,816	1,215	0.5005	0
65	Huntington	S	824,779,006	95,307,621	6,744,160,000	0.014	996,000		4,358,816	828	0.7730	.0
66	Colstrip	S	221,923,196	15,728,446	1,099,064,000	0.014	155,600			1,426		0
67	Craig	S							4,514,416		0.8063	
58	Grant PUD	PP	175,413,982	22,290,729	1,344,729,000	0.017	172,100	-	4,686,516	1,019	0.8920	0
59	Douglas County, Inc.	PP	-	2,360,557	135,994,000	0.017	22,000	8	4,708,516		0.7057	
70	Hunter Unit No. 2	5	212 000 000	177,038	10,143,000	0.017		7 8	4,714,766		0.1853	0
71	Hunter Unit No. 1	5	313,089,099	31,803,729	1,820,865,000	0.017	294,500		5,009,266	1,063	0.7058	0
	Hunter Unit No. 3		387,041,540	53,314,799	2,904,129,000	0.018	457,700		5,466,966	846	0.7243	0
72		S PP	532,972,587	52,721,821	2,849,599,000	0.019	495,600		5,962,566	1,075	0.6564	0
73	Deseret Generation & Transmission Cooperative Carbon		18,968,825	13,026,114	679,693,000	0.019	100,000		6,062,566	190	0.7759	0
75		S	132,570,769	25,897,410	1,287,240,000	0,020	188,600		6,251,166	703	0.7791	0
76	Lacomb Irrigation District	S	750 007 044	75,330	3,642,000	0.021	1,180	7 8	6,252,346	2.00	0.3523	0
	Naughton Cholla	S	768,007,014	105,801,044	5,056,959,000	0.021	707,200		6,959,546	1,086	0.8163	.0
77 78	Jim Bridger		527,862,468	59,141,031	2,703,937,000	0.022	414,000		7,373,546	1,275	0.7456	1
79		S	1,068,978,479	203,151,812	9,250,668,000	0.022	1,545,100		8,918,646	692	0.6835	1
	Portland General Electric Company	PP	05 000 054	270,000	12,024,000	0.022		7 8	8,920,646		0.6863	1
80	Hayden	5	85,988,054	11,686,571	488,619,000	0.024	81,400		9,002,046	1,056	0.6852	1
81	J Bar 9 Ranch, Inc.	PP		1,607	67,000	0.024		7 8	9,002,146	500	0.0765	1
82	Tri-State Generation and Transmission Association, Inc	PP	6,351,000	2,894,270	113,858,000	0.025	25,000		9,027,145	254	0.5199	1
83	Oregon State University	PP	-	9,984	386,000	0.026		7 8	9,033,646	-	D.0068	1
84	Public Utility District No. 1 of Douglas County (s)	PP	5.	2,367,669	88,266,000	0.027		7 8	9,071,646		0.2652	1
85	Tesoro Refining and Marketing Company	PP	-	845,991	25,014,000	0.034		7 8	9,096,646		0.1142	7
86	Kennecott Utah Copper LLC	PP		1,921,698	56,510,000	0.034		7 8	9,135,986		0,1643	1
87	Wasatch Integrated Waste Management District	PP		32,530	948,000	0.034	1.00	7 8	9,137,586		0.0676	1
88	Rock River 1, LLC	PP	7	4,793,270	135,098,000	0.035		7 8	9,186,586		0.3147	1
89	Yakima-Tieton Irrigation District	PP	17,281	251,416	6,864,000	0.037	1,600	8	9,188,186	11	0,4897	1
90	Harold Foster & Robert Walker	PP		31,620	857,000	0.037		7 8	9,188,386		0.4892	1
91	Sunnyside Cogeneration Associates	PP	10,621,050	15,945,696	418,433,000	0.038	52,000	8	9,240,386	204	0.9186	1
92	US Magnesium LLC	PP.		5,154,841	128,736,000	0.040		7 8	9,276,386		0.4082	1
93	Ballard Hog Farms Inc.	PP	302	2,431	60,000	0.041	10	8	9,276,396	30	0,6849	1
94	RES Ag - Oak Lea LLC	PP		41,694	1,015,000	0.041	170	7 8	9,275,566	-	0.6816	1

(Based on FERC Form No. 1 Data from 2012)

#### 1) Stacking of generating plants according to fuel expense [col. (7)].

Min Monthly Peak 7337 Max Monthly Peak 9831

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8) Max Name		(9) Accum.	(10)	(11)	(12)
Plant	Plant	Plant Type	Total Cost	Fuel Expense dollars	Generation kWh	Fuel Expense \$/kWh	Plate Rating kW		Name Plate Capacity	Name Plate \$/kW	Plant	Participating Plant
No.		Plant Type <sup>1</sup>	(p402,17) <sup>2, 6</sup>	(p402/3, 20)3.5	(p402/3, 12) <sup>4</sup>	(5)/(6)	(p402/3, 5)		kW	(4) / (8)		(FERC Stack)5
95	City of Portland, Portland Water Bureau	PP	-	2,015	49,000	0,041		7 8	9,276,596		0.1865	1
96	Hermiston	GT	172,412,531	47,631,026	1,149,724,000	0.041	279,600		9,556,196	517	0.4694	1
97	Idaho Falls, City of	PP	-	2,900,829	68,969,000	0.042	22,500	7 8	9,578,696	91.	0.3499	1
98	Hermiston Generating Company, L.P.	PP	36,089,626	48,441,607	1,146,891,000	0.042	223,000		9,801,696	162	0.5871	1
99	Roseburg Forest Products Company	PP		1,559,074	36,743,000	0.042	30,000	7 8	9,831,696		0.1398	1
100	Shoshone Irrigation District	PP	188,293	434,781	10,185,000	0.043	2,600	8	9,834,296	72	0.4472	0
101	Draper Irrigation Company	PP	-	2,698	63,000	0.043	511	7 8.	9,834,807		0.0141	0
102	Eurus Combine Hills I, LLC	PP	-	4,922,879	108,721,000	0.045	41,000	7 8	9,875,807		0.3027	0
103	CER Generation II, LLC	PP	5,208,000	12,478,140	272,791,000	0.046	200,000	7	10,075,807	26	0.1557	0
104	United States Air Force at Hill Air Force Base	pp.		654,845	14,227,000	0.046		7 8	10,078,264		0.6610	0
105	Cottonwood Hydro, LLC	PP.		141,210	2,994,000	0.047		7 8	10,079,374		0.3079	0
105	Weber County	PP	-	238,529	5,022,000	0.047		7 8	10,080,324	- 2	0.6035	0
107	Simplot Phosphates LLC	PP	494,000	3,991,543	79,938,000	0.050	10,000	8	10,090,324	49	0.9125	0
108	Meadow Creek Project Company LLC	PP	-	1,509,603	29,683,000	0.051		7 8	10,210,024	-	0.0283	0
109	C Drop Hydro, LLC	PP		135,034	2,619,000	0.052		7 2	10,211,124		0.2718	0
110	Lake Side	GT	356,733,564	149,162,596	2,890,938,000	0.052	591,300		10,802,424	603	0.5581	0
111	Roseburg LFG Energy, LLC	pp	-	592,655	11,411,000	0.052		7 8	10,804,024		0.8141	0
112	Currant Creek	GT	373,369,290	111,149,193	2,132,523,000	0.052	566,900	, , ,	11,370,924	659	0.4294	0
113	Stahlbush Island Farms, Inc.	PP	575,555,255	428,422	8,213,000	0.052	2,10,10	7. 8.	11,372,524	653	0.5860	0
114	Cameron A. Curtiss	PP	-	5,284	101,000	0.052		7 8	11,372,524		0.1537	0
115	Duane Wiggins Hydro, Inc.	pp	120	787	15,000	0.052		7 8			0.0856	D
116	Spanish Fork Wind Park 2, LLC	pp -		2,555,950	48,703,000	0.052	100		11,372,619			
117	O.J. Power Company	pp		36,019	684,000	0.053			11,391,519		0.2942	0
118	City of Preston Idaho	PP	300	135,558	2,557,000	0.053		7 8	11,393,779		0.0345	0
119	Lower Valley Energy, Inc.	PP	2	58,928	1,107,000	0.053		7 8	11,394,179		0.7297	0
120	Commercial Energy Management Inc.	PP		100,966	1,877,000	0.054		7 8	11,394,939		0.1663	0
121	Dry Creek LLC	PP				0.00		7 8	11,395,839	121	0.2381	0
122	Jake Amy	pp		552,993	10,268,000	0.054		7 8	11,399,839		0.2930	0
123	Chehalis	GT	340,450,692	94,429	1,724,000	0.055		7 8	11,400,329		0.4016	0
124	Mountain Wind Power, LLC	PP	340,430,032	47,149,887	849,938,000	0.055	593,300	0.0	11,993,629	574	0.1635	0
125	Mink Creek Hydro LLC	PP	-	9,522,713	171,518,000	0.056		7 8	12,054,529	120	0.3215	0
126	Wolverine Creek Energy, LLC	PP	3.0	493,901	8,861,000	0.056		7 8	12,057,709		0.3181	0
127	Power County Wind Park North, LLC	PP	2	10,027,514	178,431,000	0.056		7 8	12,122,209		0.3158	0
128	Georgetown Irrigation Company	PP	-	3,979,854	70,382,000	0.057		7 8	12,144,709		0.3571	0
129	Power County Wind Park South, LLC		-	114,462	2,023,000	0.057		7 8	12,145,119		0.5633	0
130		PP PP	60.0	3,664,717	64,743,000	0.057		7 8	12,167,619		0.3285	0
131	Nicholson's Sunny Bar Ranch		500	107,012	1,870,000	0.057		7 8	12,167,969	8	0.5099	0
	Marsh Valley Hydro Electric Company	PP		292,280	5,083,000	0.058		7 8	12,169,749		0.3260	0
132	CDM Hydroelectric Company	PP	-	1,634,850	28,427,000	0.058		7 8	12,175,749		0.5408	0
133	Ingram Warm Springs Ranch Partnership	PP		70,730	1,224,000	0.058		7 8	12,176,699		0.1471	0
134	Birch Power Company, Inc.	PP	-	888,603	15,362,000	0.058		7 8	12,179,349	-	0.6618	0
135	Cargill, Incorporated	PP		292,708	4,946,000	0.059		7 8	12,181,049		0.3321	0
135	George DeRuyter & Sons Dairy	PP	14,014	416,932	5,710,000	0.062	800	8	12,181,849	18	0.9575	.0
137	Evergreen BioPower, LLC	PP		2,158,175	34,659,000	0.062	10,000	7 8	12,191,849	2	0.3957	0
138	Middle Fork Irrigation District	PP	4.5	1,572,734	25,232,000	0.062	5,000	7 8	12,196,849		0.5761	0
139	Oregon Environmental Industries, LLC	PP		1,376,978	22,079,000	0.062	3,200	7 8	12,200,049	-	0.7876	0
140	Chevron U.S.A. Inc.	PP	35	2,894,381	45,768,000	0,063	17,000	7 8	12,217,049		0.3073	0
141	Three Buttes Windpower, LLC	PP	14.5	21,581,288	340,033,000	0,064	99,000	7 8	12,316,049	-	0.3921	0

(Based on FERC Form No. 1 Data from 2012)

Min Monthly Peak 7337 Max Monthly Peak 9831

#### 1) Stacking of generating plants according to fuel expense [col. (7)].

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8) Max Name		(9) Accum	(10)	(11)	(12)
Plant	Plant	Plant Type	Total Cost	Fuel Expense dollars	Generation kWh	Fuel Expense 5/kWh	Plate Rating kW		Name Plate Capacity	Name Plate 5/kW	Plant Factor	Participating Plant
No.		Plant Type <sup>1</sup>	(p402,17) <sup>2,6</sup>	(p402/3, 20) <sup>3, 6</sup>	(p402/3, 12)4	(5) / (6)	(p402/3, 5)		kW	(4)/(8)		(FERC Stack)
142	Mountain Wind Power IJ, LLC	PP	-	14,574,484	227,793,000	0.064	79,800	7 8	12,395,849	-	0.3259	0
143	Farmers Irrigation District	PP		1,578,289	24,377,000	0.065	4,800	7 8	12,400,649		0.5797	0
144	Loyd Fery	PP	-	22,539	348,000	0.065	40	7 8	12,400,689		0.9932	0
145	Top of The World Wind Energy LLC	PP	-	43,898,356	665,128,000	0,066	200,200	7 8	12,600,889	100	0.3793	.0
146	Ward Butte Windfarm, LLC	PP		1,194,858	17,718,000	0.067	6,600	7 8	12,607,489		0.3065	0
147	Oregon Trail Windfarm, LLC	PP		1,763,384	26,111,000	0.068	9,900	7 8	12,617,389		0.3011	.0
148	Four Corners Windfarm, LLC	PP	100	1,926,532	28,521,000	0.068	10,000	7 8	12,627,389		0.3256	Ď.
149	Sand Ranch Windfarm, LLC	PP		1,646,437	24,317,000	0,068	9,900	7 8	12,637,289	100	0.2804	0
150	Four Mile Canyon Windfarm, LLC	PP	-	1,758,543	25,965,000	0.068	10,000	7 2	12,647,289		0.2964	0
151	Pacific Canyon Windfarm, LLC	PP		1,344,769	19,839,000	0.068	8,250	7 8	12,655,539	2.	0.2745	0
152	Wagon Trail, LLC	PP	-	520,842	7,682,000	0.068		7 8	12,658,839		0.2657	0
153	Big Top, LLC	PP		260,709	3,844,000	0.068		7 8	12,660,489		0.2659	.0
154	Butter Creek Power, LLC	PP.		888,593	13,093,000	0.068		7 8	12,665,439	160	0.3019	0
155	Lower Valley Energy, Inc.	PP		396,577	5,822,000	0.068		7 3	12,666,379		0.7070	0
156	Rough & Ready Lumber Company	PP		559.319	8,196,000	0.068		7 8	12,667,659		0.7310	0
157	Biomass One, L.P.	PP		8,725,321	127,571,000	0.068		7 8	12,697,659		0.4854	0
158	Mountain Energy, Inc.	PP		6,574	96,000	0.068		7 8	12,697,709	- 2	0.2192	0
159	Finley BioEnergy, LLC	pp		2,342,922	34,089,000	0.069		7 8	12,702,509	100	0.8107	0
160	Swalley Irrigation District	PP		145,570	2,115,000	0.069		7 8	12,703,509		0.2414	0
161	Threemile Canyon Wind L LLC	pp	6	1,566,514	22,740,000	0.069		7 8	12,713,509		0.2596	0
162	City of Albany	PP		57,170	829,000	0.069		7 8	12,714,009		0.1893	0
163	Roush Hydro Inc.	PP		20,510	297,000	0.069		7 8	12,714,084		D,4521	0
164	City of Hurricane	PP		138,717	1,928,000	0.072		7 8	12,715,084	-	0.2201	0
165	Public Utility District No. 2 of Grant County	PP	104,746	4,234,461	58,852,000	0.072	14,000	8	12,715,084	7	0.2201	0
166	Bell Mountain Hydro, LLC	pp	104,740	76,989	1,027,000	0.075		-	12,729,084	χ.	0.4043	0
167	Thayn Hydro LLC	PP	83,116	231.688	2,768,000	0.073	300	7 8	12,729,574	277	1.0533	0
168	Central Oregon Irrigation District	PP	608,150	4,846,859	52,300,000	0.084	5,900	8	12,735,574	103	1,0555	0
169	Santiam Water Control District	PP	13,632	152,919		0.095						
170	The Town of the City of Buffalo	pp			1,609,000		200	8	12,735,774	68	0.9184	0
171	Gadsby Peakers	GT	23,310 80,657,121	185,095	1,888,000	0.098	200	.6	12,735,974	117	1,0776	0
		PP		9,415,092	94,391,000	0.100	181,100		12,917,074	445	0.0595	-
172	Slate Creek Hydro Company, Inc. Falls Creek H.P. Limited Partnership	PP	120,921	844,985	7,970,000	0.106	2,400	8	12,919,474	50	0.3791	0
	The state of the s		255,074	2,197,882	19,554,000	0.112	3,600	8	12,923,074	71	0.5201	0
174	Deschutes Valley Water District	PP	567,894	3,232,576	28,734,000	0.113	5,800	8	12,928,874	98	0,5655	0
	Sprague Hydro, LLC	PP	55,233	304,346	2,577,000	0.118	500	8	12,929,374	110	0.5884	0
176	Gadsby Steam	S	82,778,915	14,231,285	120,348,000	0.118	251,600		13,180,974	329	0.0546	0
	Box Canyon Limited Partnership		271,905	1,843,813	15,586,000	0.118	2,900	8	13,183,874	. 94	0.6135	0
178	Eagle Point Irrigation District	PP	45,865	423,858	3,574,000	0.119	800	.8	13,184,674	57	0,5100	0
179	Douglas County	PP	83,226	905,218	7,179,000	0.126	800	8	13,185,474	104	1.0244	0
180	Ralphs Ranch, Inc.	PP	•	28,892	215,000	0.134	100 7	7 8	13,185,574	*	0.2454	0
181	Paul Luckey	PP	3.5	38,030	282,000	0.135	50 7	7 8	13,185,624		0,6438	0
182	City of Walla Walla	PP	138,980	1,986,857	13,637,000	0.146	2,000	8	13,187,624	69	0.7784	0
183	Solwatt LLC	PP		103,662	443,000	0.234	305 7	7 8	13,187,930	-	0.1653	0
184	Joseph Community Solar LLC	PP-	3.5	159,880	667,000	0.240		7 5	13,188,352		0.1804	0
185	Black Hills	PP	300,000	204,302	10,000	20.430	100,000	8	13,288,352	3	0.0000	0

(Based on FERC Form No. 1 Data from 2012)

Min Monthly Peak 7337 Max Monthly Peak 9831

#### 1) Stacking of generating plants according to fuel expense [col. (7)].

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
							Max Name	Accum.			
				Fuel Expense	Generation	Fuel Expense	Plate Rating	Name Plate	Name Plate	Plant	Participating
Plant	Plant	Plant Type	Total Cost	dollars	kWh	S/kWh	kW	Capacity	S/kW	Factor	Plant
No.		Plant Type <sup>1</sup>	(p402,17) <sup>2,6</sup>	(p402/3, 20) <sup>3, 6</sup>	(p402/3, 12) <sup>4</sup>	(5) / (6)	(p402/3, 5)	kW	(4)/(8)		(FERC Stack) <sup>5</sup>

Note 1: Parenthetical letter designations are as follows; G = Geothermal, GT = Gas Turbines, H = Hydro, HS = Hydro Storage PP = Purchased Power Agreement, S = Steam, and W = Wind. Steam plants use coal, gas and/or oil for fuel, see Form 1 for details.

Note 2: Plant (Types) showing "PP" are from pages 327.x, column j.

Note 3: Plant (Types) showing "PP" are from pages 327.x, column k. Plant Numbers 180 and 181, Joseph Community Solar LLC and Solwatt LLC, Fuel Expense has been set at \$230/MWh, as per their contracts

Note 4: Plant (Types) showing "PP" are from pages 327.x, column g.

Note 5: Insert a "1" next to the unit expected to participate. Power for "off-system sales" will only be provided after native load requirements are met.

reported on page 401b of Form 1. Load for PacifiCorp's combined system comes from its Load Report, Section IV, Total 401b Load. Participating plants will generally

be those ranked above an Accumulated Name Plate Capacity that equals or exceeds the Minimum Peak shown below:

Min. Peak (MW) 7,337 Max. Peak (MW) 9,831; Min: FERC Form 1, 401b, 32, Max: FERC Form 1, 401b, 35.

Note 6: The following adjustments were made to the Total Costs and Fuel Expense costs associated with the listed PPAs:

- 1) CER Generation II, LLC: include \$12,478,140 in FF1 reported Other charges to the Fuel Expense \$ column (5) O&M and fuel for West Valley.
- Deserted Generation & Transmission; included \$3,936,927 of FF1 reported Other Charges to Total Cost column (4) as part of demand charge they are the fixed O&M charges paid under PPA starting at \$2.76/kw-mn and escalating at 2.5% per year.
- 3) Idaho Falls (Gem State): included \$2,900,829 in FF1 reported Other charges to the Fuel Expences \$ column (5) O&M charges for PAC share of Gem State.
- 4) Joseph Community Solar Energy Charges reports \$159,880 instead of FF1 reported \$20,484.
- 5) Portland General Electric (Cove Replacement); include \$270,000 in FF1 reported Other charges to the Fuel Expense column (5) O&M for Cove replacement project.
- 6) Douglas PUD (Wells PSA): include \$3,263,025 in FF1 reported Other charges to the Fuel Expense column 5 it is the Take/Pay cost for Wells PSA.
- 7) Grant PUD (14 MW contract): Include in Fuel Expense column (5) the \$206,201 in "Other Charges" It is the "Ancillary Services" part of the billing charges.
- 8) Solwatt Solar Energy Charges reports \$103,662 instead of FF1 reported \$15,862.

Note 7; Billing demand not included in column D of FERC Form 1, pg 327; obtained the contractual MW from the contract.

Note 8: Non-dispatchable resources, EAF will equal the plant factor. Additionally, Hydro generation that is "run-of-river" is also non-dispatchable but is not distinguished from other Hydro in this report.

(Based on FERC Form No. 1 Data from 2012)

II) Demand related O&M expenses by generating plant.

	II) Demand related O&M expenses by generating plant														
	(1)	(2)	(3) Max Name	(4) Operations	(5)	(6)	(7)	(8)	(9) Miscellaneous	(10) Miscellaneous	(11)	(12)	(13) Maintenance	(14)	(15)
			Plate	Supervision &	Coolant	Steam	Hydrolic	Electric	Steam/Nuclear	Hydrolic Power		Maintenance	of Misc.		
	Plant	Plant (Type)	Rating	Engineering	& Water	Expenses	Expenses	Expenses	Expenses	Generation Exp	Rents	of Structures	Steam/Nuclear	Total	0&M
	No.		kW	(p402-19)	(p402-21)	(p402-22)	(p402-22)	(p402-25)	(p402-26)	(p402-26)	(p402-27)	(p402-30)	(p402-33)		S/kW
1	Cholla	S	414,000	1,650,019	3	8,412,343		828,656	2,003,022	-		629,121	2,615,209	16,138,370	5 38.98
2	Jim Bridger	5	1,545,100	15,997,364		3,812,213		307	(12,061,776)	-	237,500	10,093,311	2,690,211	20,769,130	\$ 13.44
3	Portland General Electric Company	PP	2,000	100		-		-		-		-			\$ -
4	Hayden	.5	81,400	179,935	1 11 2	952,473	-	329,863	430,372			409,933	457,559	2,760,135	\$ 33.91
5	J Bar 9 Ranch, Inc.	PP	100	-					-	-		120			\$ -
6	Tri-State Generation and Transmission Association, Inc.	PP	25,000				-		-	~	-				\$ -
7	Oregon State University	PP	6,500	4	-			100				-	-	-	\$ -
8	Public Utility District No. 1 of Douglas County (s)	PP	38,000	-	=			-			10.00		-		5 -
9	Tesoro Refining and Marketing Company	PP	25,000	-		197		-				14	*	-	\$ -
10	Kennecott Utah Copper LLC	PP	39,340	4	9.1	1,0,1		-	-			1-0	-	-345	\$ .
11	Wasatch Integrated Waste Management District	PP	1,600	9.1	-	11.5		-			-	-		9-30	\$ -
12	Rock River 1, LLC	PP	49,000	200				-	-	- 5		1 8	*	0.30	\$ .
13	Yakima-Tieton Irrigation District	PP	1,600		2	1.8		-				1,0			5 .
14	Harold Foster & Robert Walker	PP	200		-					4	100	-	-1-	0.20	\$ .
15	Sunnyside Cogeneration Associates	PP	52,000		-	-		-		-		1.3			5 -
16	US Magnesium LLC	PP	36,000	-	-	1,2,1		-	-		-	4.0	3.5		5 -
17	Ballard Hog Farms Inc.	PP	10					-		4		0.0		10.4.5	\$ -
18	RES Ag - Oak Lea LLC	PP	170	34			-	-		-		0.0	~		5 -
19	City of Portland, Portland Water Bureau	pp.	30		-					10.0		16.50			\$ -
20	Hermiston	GT	279,600					9,287,696		-	-	10.00	-	9,287,696	\$ 33.22
21	Idaho Falls, City of	PP	22,500	-		15.1	-		-	-		**	-	-	\$ -
22	Hermiston Generating Company, L.P.	PP	223,000		-	~				100	-4	0-0	-		\$ -
23	Roseburg Forest Products Company	PP	30,000	-	-	-		0.00			11-00	10.4	-	1	\$ -

# PacifiCorp Annual Fixed Charge Rate Calculation (Based on FERC Form No. 1 Data from 2012)

#### I) Determine Rate of Return Contribution.

A) Develop Common Stock Component

			PacifiCorp
Proprietary Capital	(112, 16, c)	\$	7,644,054,942
Less: Preferred Stock	(112, 3, c)	S	40,733,100
Acc. 216.1	(112, 12, c)	\$	157,299,053
Common Stock		S	7,446,022,789

B) Determine Consolidated Cost of Capital

lidated Cost of Capital					Weighted
	Y	ear End Balance	Ratio	Cost	Weighted Cost
Long Term Debt <sup>1</sup>	\$	6,806,057,103	47.62%	5.31%	2.53% ("WCLTD")
Preferred Stock <sup>1</sup>	S	40,733,100	0.28%	5.03%	0.01%
Common Stock <sup>2</sup>	\$	7,446,022,789	52.10%	9.80%	5.11%
Total	\$	14,292,812,992	100.00%		7.65% ROR

5

5

		PacifiCorp
Where: Long Term Debt (112, 24, c) =	\$	6,806,057,103
LTD Interest (117, 62 through 66, c) =	\$	361,338,060
Preferred Dividends (118, 29, c) =	5	(2,049,846)

### II) Determine Production O&M Expense Contribution.

Acc. 518 Fuel

Acc. 528 Mnt. S&E

Acc. 530 Mnt. Reac. Plt.

	G 171 1811 1111 1111			PacifiCorp
C) Total Power Produ	ction Exp.	(321, 80, b)	\$	2,142,943,722
D) Purchased Power	Expenses <sup>3</sup>	(321, 76, b less 327, "Total", j)	S	459,198,761
E) Energy Related:				
	Acc. 501 Fuel	(320, 5, b)	\$	768,997,788
	Acc. 503 Stm./Other Srcs.	(320, 7, b)	\$	3,937,027
	Acc. 504 Stm. Tfd. (Cre)	(320, 8, b)	\$	
	Acc. 510 Mnt. S&E	(320, 15, b)	\$	6,378,884
	Acc. 512 Mnt. Blr. Plt.	(320, 17, b)	\$	107,992,173
	Acc. 513 Mnt. Elect. Plt.	(320, 18, b)	\$	35,012,328

(320, 25, b)

(320, 35, b)

(320, 37, b)

Acc. 5	531 Mnt. Elect. Plt. (320, 38, b)	S	-
Acc. 5	544 Mnt. Elect. Plt. (320, 56, b)	S	1,974,573
Acc. 5	547 Fuel (321, 63, b)	\$	364,507,540
	Total	\$	1,288,800,313
F) Total Production Plant	(205, 46, g)	-\$	10,942,646,469

G) Consolidated Production O&M Contribution

0.036092

### III) Determine Production-Related A&G Expense Contribution.

			PacifiCorp		
H) Production Wages Expense	(354, 20, b)	\$	140,994,569		
I) A&G Wages Expense	(354, 27, b)	\$	43,097,996		
J) Total Wages Expense	(354, 28, b)	\$	363,265,480		
K) Total A&G related O&M	(323, 197, b)	-\$	188,239,678		
	ted, A&G Contribution  H x K  F	0.007576			

#### IV) Determine Production-Related Depreciation Expense Contribution.

- N) Determine Consolidated Depreciation Rate and Production Plant Life
  - i) Determine Consolidated Depreciation Rate ("r")

ii) Determine Production Plant Life ("n")

O) Determine Consolidated, Production-Related, Depreciation Contribution ("d")

V) Determine Other Taxes Expense Contribution.

R) Consolidated, Production-Related, Other Taxes Contribution

0.006779

0.022510

#### VI) Determine Composite Income Tax Expense Contribution.

S) Determine "CTR"

CTR = 1 - (((1 - SIT) x (1 - FIT) / (1 - SIT x FIT x p)) = 37.95% where FIT = 35.00% SIT = 4.54% 
$$p = 0$$

T) CIT Contribution

$$(CTR/(1-CTR))*(ROR+d-r)*(1-(WCLTD/ROR))=$$

### VII) Determine ADIT Offset Contribution.

U) Calculate ADIT.

	PacifiCorp		
ADIT Account 190 (234, 8, c)	\$ 648,219,005		
ADIT Account 282 (275, 2, k)	\$ 3,796,825,280		
ADIT Account 283 (277, 9, k)	\$ 728,061,162		
Total ADIT (Acc. 190 - Acc. 282 - Acc. 283)	\$ (3,876,667,437)		

V) ADIT Contribution

$$(U/Q)x(ROR+CIT) = (0.016169)$$

#### VIII) Determine General Plant Contribution.

W) Determine Intangible and General Plant

Intangible and General Plant (205, 5, g and 207, 99, g)	PacifiCorp	
Intangible and General Plant (205, 5, g and 207, 99, g)	\$	2,213,568,219

#### X) General Plant Contribution

((H/(J-1))\*W\*(R+ROR+O+T+V))/F=

0.008438

IX) Determine M&S Contribution.

Y) Determine Prod. M&S (227, 1 and 7, c)

PacifiCorp \$ 363,688,990

Z) Determine M&S Contribution

(Y/F)xROR

0.002542

X) Determine Cash Working Capital Contribution.

AA) Determine Cash Working Capital Contribution

((C-D-Acc. 501-Acc. 518-Acc. 547)/8\*(ROR+T))/

0.000622

XI) Determine Production Fixed Charge Rate

Rate of Return Contribution.

0.076479

II) O&M Expense Contribution.

0.036092

III) A&G Expense Contribution.

0.007576

IV) Depreciation Expense Contribution.

0.005126

V) Other Taxes Expense Contribution.

0.006779

VI) Composite Income Tax Expense Contribution.

0.022510

VII) ADIT Offset Contribution.

(0.016169)

VIII) General Plant Contribution.

0.008438

IX) M&S Contribution.

0.002542

X) Cash Working Capital Contribution.

0.000622

Fixed Charge Rate (Use for system avg. fuel sales)

Fixed Charge Rate Less O&M (Use for all other sales)

0.149995

0.113903

#### XII) Notes

Note 1 - Information used to calculate the cost as follows: Long Term Debt cost = Long Term Interest / Long Term Debt Preferred Stock cost = Preferred Dividends / Preferred Stock

Note 2 - Common Stock cost shall be equal to 9.8%, which is the system weighted average ROE authorized by state utility commissions.

Jurisdiction	Annual MWH*	Percent	Authorized Return on Equity	Effective Date	Weighted Authorized Return on Equity
CALIFORNIA	919,114	1.56%	10.60%	Jan-07	0.17%
OREGON	14,537,470	24.68%	9.80%	Jan-13	2.42%
WASHINGTON	4,493,393	7.63%	9.50%	Dec-13	0.72%
UTAH	25,106,695	42.62%	9.80%	Oct-12	4.18%
IDAHO	3,738,889	6.35%	9.90%	Dec-10	0.63%
WYOMING	10,110,540	17.16%	9.80%	Oct-12	1.68%
TOTAL	58,906,100	100.00%			9.80%

<sup>\*</sup> Annual temperature normalized 2012 retail load in the jurisdictions that PacifiCorp serves.

Note 3 - Demand charge expenses included in Account 555 (327, "Total", j) remain part of the FCR. Amounts that are energy and/or fuel charge related need to be removed from the FCR calculation. This amount is determined as follows:

Form 1 (321, 76, b) \$ 535,586,277
Less: Amount remaining in FCR \$ 76,387,516
Amount removed from FCR \$ 459,198,761

# ATTACHMENT C

Principal Wholesale Customers for the Proposed New Cost-Based Rate Schedule

#### POTENTIAL CUSTOMER LIST - PACIFICORP

Fallon, City of Attn: Steven King 55 W. Williams Avenue Fallon, NV 89406

Phone: (775) 423-3550 Fax: (775) 423-3550

E-Mail: falonlaw2@cccomm.net

Mt. Wheeler Power, Inc. Attn: Randy Ewell 1600 Great Basin Blvd. P.O. Box 151000 Ely, NV 89315-1000

Phone: (775) 289-8981 ext 139 E-Mail: mwprandy@mwpower.net

Truckee Donner Public Utility District

Attn: Stephen Hollabaugh 11570 Donner Pass Road

P.O. Box 309

Truckee, CA 96160-0309 Phone: (530) 582-3934 Fax: (530) 587-1189

E-Mail: Stephenhollabaugh@tdpud.org

Wells Rural Electric Attn: Clay Fitch P.O. Box 365 1451 Humboldt Wells, NV 89835 Phone: (775) 752-3328

E-Mail: cfitch@wrec.coop

Boulder City, City of Attn: Ned Shamo 401 California Avenue P.O. Box 61350

Boulder City, NV 89006 Phone: (702) 293-9231

E-Mail: nshamobenv@earthlink.net

Pacific Gas & Electric Company-Utility

Attn: Sandra Duncan 77 Beale Street, room 1369 San Francisco, CA 94105-1814

Phone: (415) 973-2796 Fax: (415) 973-7043 E-Mail: SMD2@pge.com

Bonneville Power Administration

Attn: Scott Wiley 905 NE 11<sup>th</sup> Avenue Portland, OR 97208-3621 Phone: (503) 230-3877 Fax: (503) 230-3621 E-Mail: sdwiley@bpa.gov

Harney Electric Attn: Randy Whitaker 1326 Hines Blvd Burns, OR 97720 Phone (541) 573-2061

E-Mail: randy.whitaker@harneyelectric.org

Colorado River Commission of Nevada

Attn: Gail Bates

555 Washington Avenue, Suite 3100

Las Vegas, NV 89101-1065 Phone: (702) 691-5228 Fax: (702) 691-5222 E-Mail: gbates@crc.nv.gov

Southern Nevada Water Authority

Attn: Scott Krantz

100 City Parkway Suite 700 Las Vegas, NV 89106 Phone: (702) 691-5240 Fax: (702) 691-5220

E-Mail: scott.krantz@snwa.com

#### POTENTIAL CUSTOMER LIST - PACIFICORP CONTINUED

Lincoln County Power District No. 1

Attn: Dave Luttrell HC 74-Box 101 Pioche, NV 89043 Phone: (702) 595-9705

E-Mail: david luttrell@earthlink.net

Overton Power District No. 5

Attn: Delmar Leatham

P.O. Box 395

615 N. Moapa Valley Blvd Las Vegas, NV 89119

Phone: (775) 397-2512 ext 3020 E-Mail: dleatham@opd5.com

Sierra Pacific Power Company

Attn: Thomas Woodworth 6226 West Sahara Avenue Las Vegas, NV 89146 Phone: (702) 402-5694

E-Mail: TWoodworth@nvenergy.com

Morgan Stanley Capital Group, Inc.

Attn: James McLellan 2000 Westchester Avenue Purchase, NY 10575 Phone: (914) 225-1433

Fax: (914) 225-9297

E-Mail: James.McLellan@MorganStanley.com

Valley Electric Association

Attn: Thomas Husted

P.O. Box 237

800 E. Highway 372

Pahrump, NV 89041-0237 Phone: (775) 727-2139

E-Mail: tomh@vea.coop

Nevada Power Company

Attn: Thomas Woodworth 6226 West Sahara Avenue Las Vegas, NV 89146

Phone: (702) 402-5694

E-Mail: TWoodworth@nvenergy.com

Shell Energy North America (US), L.P.

Attn: James Davitt Two Houston Center 909 Fannin, Plaza Level 1 Houston, TX 77010-1014 Phone: (713) 230-3414

Fax: (858) 320-2684

E-Mail: i.davitt@shell.com

Northern California Power Agency

Attn: David Dockham 651 Commerce Drive Roseville, CA 95678-6420 Phone: (916) 781-4256

Fax: (916) 781-4252

E-Mail: dave.dockham@ncpa.com

#### POTENTIAL CUSTOMER LIST - PACIFICORP CONTINUED

Truckee Donner PUD Attn: Sara Owens 11570 Donner Pass Road

Truckee, California 96161 Phone: (530) 582-3956

E-Mail: saraowens@tdpud.org

Arizona Public Service Company

Attn: Fred Contreras 400 N. 5th Street Mail Station 9831 Phoenix, AZ 85004 Phone: (602) 250-2892

Phone: (602) 250-2892 Fax: (602) 250-3238

E-Mail: federico.contreras@aps.com

WAPA -Sierra Nevada Region

Attn: Sonja Anderson 114 Parkshore Drive Folsom, CA 95630 Phone: (916) 353-4421

Fax: (916) 985-1931

E-Mail: sanderso@wapa.gov

Utah Associated Municipal Power System

Attn: Marshall Empey

155 North 400 West Suite 480 Salt Lake City, UT 84103 Phone: (801) 214-6405 Fax: (801) 561-2687

E-Mail: marshall@uamps.com

Arizona Electric Power Cooperative

Attn: Walter Bray P.O. Box 670

Benson, AZ 85602-0670 Phone: (520) 583-5201 Fax: (520) 586-5279 E-Mail: wbray@ssw.coop