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DPU Data Request 2.1

Customer numbers for Utah, as reported in PacifiCorp's 2015 Results of Operation JAM model filed in this docket and used in the development of the CN allocation factor appear to be different than customer numbers used to develop the same factor in PacifiCorp's JAM models used for ratemaking purposes. For example, PacifiCorp reports 966,815 Utah customers in its 2015 Results of Operation JAM model. In comparison, PacifiCorp reported 850,309 Utah customers in its June 4, 2014, Rebuttal JAM model used in the general rate case in Docket No. 13-035-184. [The Rebuttal JAM model can be found on the Commission's website in Docket No. 13-035-184 at the June 4, 2014 entry entitled "McDougal Rebuttal Work papers - Copy of UT GRC Rebuttal JAM - June 2015 Test Period"].

Please explain how the customer numbers are determined for the different applications and identify their associated data source(s), broken out by rate schedule. Also, please explain the basis and impacts of the identified methodology or methodologies.

Response to DPU Data Request 2.1

The methodology to calculate the customer number factor is the same for rate cases and results of operations reports. The customer number factor in the 2015 Results of Operations JAM inadvertently included a double count for the Company's CoolKeeper customers which resulted in overstating the number of billings.

Please see attachment DPU 2.1 for the detail used to calculate the customer number factor in Docket No. 13-035-184 and December 2015 Results of Operation. This attachment also includes the corrected CN factor for the December 2015 Results of Operations Report. Correcting the CN factor increases Utah's Return on Equity by approximately 3 basis points.