

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 UE 210

4 In the Matter of

5 PACIFICORP, dba PACIFIC POWER

6 Request for a General Rate Revision

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STAFF PROPOSED INFORMATION
REQUESTS

8 **I. INTRODUCTION**

9 Pursuant to the schedule adopted in this proceeding, the Public Utility Commission of
10 Oregon Staff (“Staff”) submits its proposed information requests. PacifiCorp’s UE 210 filing
11 lacks testimony and exhibits which should have been included with its original filing in order to
12 enable a complete review of the case. In order to create a more comprehensive evidentiary
13 record, Staff requests that the presiding Administrative Law Judges order PacifiCorp to provide
14 supplemental testimony and exhibits on the items listed in this information request.

15 The filing of proposed information requests is a new process in this rate case. This
16 request for supplemental testimony should not interfere with timely responses to Staff’s data
17 requests. Due to the short amount of time until Staff’s opening testimony is due, Staff
18 respectfully requests that the ALJs include in their ruling clarification that PacifiCorp is required
19 to adhere to the data response time frames as outlined in the prehearing conference memo with
20 the understanding that supplemental testimony is not a substitute for data responses, and that data
21 responses are not a substitute for the requested testimony.

22 **Proposed Information Requests**

23 **A. Jurisdictional Allocation Factors**

24 PacifiCorp should be required to include a discussion of how retail sales have changed or
25 are forecasted to change for each jurisdiction (state) from calendar year 2005 through calendar
26 year 2010 (test year). This discussion should include a comparison of annual sale changes by

1 jurisdiction. If the rates of change in sales materially differ among the jurisdictions, which we
2 would expect to be the case, the discussion should explain the key factors causing such
3 differences, for both actual (2005 – 2008) and forecasted (2009 and 2010) levels.

4 PacifiCorp should be required to include a discussion of how monthly coincidental peak
5 loads (12 CP) have changed or are forecasted to change by jurisdiction from calendar year 2005
6 through calendar year 2010. This should include a comparison of annual changes in coincidental
7 peak by jurisdiction. If the rates of change in monthly coincidental peak loads materially differ
8 among the jurisdictions, which we again would expect to be the case, this discussion should
9 explain the key factors causing such differences, for both actual (2005 – 2008) and forecasted
10 (2009 and 2010) levels.

11 PacifiCorp should be required to include a discussion of how the adoption of the 20 year
12 weather data set (1988 through 2007) changes the forecasted energy and peak allocation factors
13 for calendar year 2010, relative to the previous 30 year NOAA data set (1971 through 2000).

14 PacifiCorp should also be required to include the following:

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- 16 • A discussion of the methods used to adjust sales for temperature.
 - 17 • A discussion of the methods used to forecast sales, coincident peak loads, and
18 customer numbers by jurisdiction.
 - 19 • A discussion of how sales estimates are converted into energy deliveries by
20 jurisdiction.

21 **B. Load Forecast Data/Studies**

22 PacifiCorp should include a discussion of and data illustrating energy volumes delivered
23 for each calendar year of the period 2005 through 2008 by both (a) customer class for each
24 jurisdiction and (b) month; and for Oregon, (c) by month by rate schedule.

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1 In addition, PacifiCorp should be required to provide a discussion of:

- 2 • The above requested information in a combination of actual plus forecast for
3 2009.
- 4 • The above requested information as forecast for the 2010 test year, including,
5 by rate schedule, peak and off-peak periods; i.e, by month by rate schedule by
6 peak and off-peak.
- 7 • A discussion of price elasticities, whether they are used in the load forecasts,
8 their derivation (studies utilized by the company) and level, and their impact on
9 test year 2010 energy volumes.
- 10 • A discussion of and data related to volume changes for each of the years 2005
11 through 2009 related to energy efficiency measures for each jurisdiction.
- 12 • A discussion of the statistical models used by PacifiCorp in developing the
13 2010 test year load forecast, for each jurisdiction; including theoretical bases,
14 mathematical forms, and relevant statistics.
- 15 • A discussion of how such statistical models were developed; e.g., a discussion
16 of any process involving step-wise regression.
- 17 • A discussion of forecasts of or trends in the independent variables used in such
18 statistical models, including the source of any such forecasts.
- 19 • A discussion of any non-statistical models used by PacifiCorp in developing the
20 2010 test year load forecast, for each jurisdiction; including theoretical bases
21 and, if applicable, mathematical forms.
- 22 • A discussion of how these models differ from those used in PacifiCorp's last
23 Oregon general rate case for forecasting test year energy deliveries in each
24 jurisdiction.
- 25 • A discussion of the risks and uncertainties associated with the 2010 test year
26 load forecasts, for each jurisdiction.

- A discussion of and information related to reconciliation of the 2010 test year load forecast with levels of billing determinants as used in the pricing testimony (PPL/1000 through PPL/1003) for Oregon.

C. Pricing/Costing

For the following requests, Staff has provided a reference to initial testimony that requires supplementation:

- Reference: Tab 17.4 of Exhibit/907 17. Customer Data. The table lists the System, Feeder, and Transformer “12 Month Average Peak Load Factors” without any backup support – quantitative or verbal. Such would be highly valuable, particularly in light of the counter-intuitively high residential system load factor indicated as 78.75%.
- Reference: Exhibit PPL/1000 (Griffith/5, Lines 17-23). The testimony indicates a connection between the functionalized costs developed by Mr. Paice and the rates developed in Exhibit PPL/1003. In practice that connection may be tenuous at best. Example: For residential Schedule No. 4 (Exhibit PPL/1003, Griffith/1), Transmission and Ancillary Services Charge is shown to collect \$20.9 million in revenue, whereas Exhibit PPL/905, Paice/1 shows those costs to add up to \$37.5 million. When there are large discrepancies between the underlying costs and the recommended price, PacifiCorp should be required to provide justification and support.
- Reference: Exhibit PPL/1000 (Griffith/6 & 7). PacifiCorp describes the creation of a new Schedule (201) which removes Net Power Costs from the existing Schedule 200. The values in the existing Schedule 200 reflect the differences among schedules in production fixed cost allocations attributed to relative contributions to the annual system/jurisdictional coincident peak. PacifiCorp’s Schedule 201 proposal would preserve in the schedule the same rate blocks and ratios as are contained in the existing Schedule 200. But by doing such, the net power cost cost-causative basis that one would expect to underlie the Schedule 201 rates is diluted. PacifiCorp should be required to better explain why it has chosen to depart from developing rates that would better reflect each Schedule’s respective Net Power Costs causation.

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1 **CERTIFICATE OF SERVICE**

2 I certify that on May 12, 2009 I served the foregoing Staff Proposed Information
3 Requests upon the parties in this proceeding by electronic mail and by sending a true, exact and
4 full copy by regular mail, postage prepaid, or by hand-delivery/shuttle, to the parties accepting
5 paper service.

6 **CABLE HUSTON BENEDICT ET AL**

7 J LAURENCE CABLE
8 1001 SW 5TH AVE STE 2000
9 PORTLAND OR 97204-1136
10 lcable@chbh.com

11 **CABLE HUSTON BENEDICT ET AL**

12 RICHARD LORENZ
13 1001 SW FIFTH AVE - STE 2000
14 PORTLAND OR 97204-1136
15 rlorenz@cablehuston.com

16 **W**

17 **CITIZEN'S UTILITY BOARD OF OREGON**

18 G. CATRIONA MCCrackEN - **CONFIDENTIAL**
19 LEGAL COUNSEL/STAFF ATTY
20 610 SW BROADWAY - STE 308
21 PORTLAND OR 97205
22 catriona@oregoncub.org

23 **W**

24 **CITIZENS' UTILITY BOARD OF OREGON**

25 GORDON FEIGNER
26 ENERGY ANALYST
610 SW BROADWAY, SUITE 308
PORTLAND OR 97205
gordon@oregoncub.org

27 **ROBERT JENKS - CONFIDENTIAL**

28 610 SW BROADWAY STE 308
29 PORTLAND OR 97205
30 bob@oregoncub.org

31 **DAVISON VAN CLEVE PC**

32 **MELINDA J DAVISON - CONFIDENTIAL**

33 333 SW TAYLOR - STE 400
34 PORTLAND OR 97204
35 mail@dvclaw.com

36 **W**

37 **MCDOWELL & RACKNER PC**

38 AMIE JAMIESON
39 ATTORNEY
40 520 SW SIXTH AVE - STE 830
41 PORTLAND OR 97204
42 amie@mcd-law.com

43 **W**

44 **MCDOWELL & RACKNER PC**

45 KATHERINE A MCDOWELL
46 ATTORNEY
47 520 SW SIXTH AVE - SUITE 830
48 PORTLAND OR 97204
49 katherine@mcd-law.com

50 **W**

51 **PACIFIC POWER & LIGHT**

52 JOELLE STEWARD
53 REGULATORY MANAGER
54 825 NE MULTNOMAH STE 2000
55 PORTLAND OR 97232
56 joelle.steward@pacificorp.com

57 **JORDAN A WHITE**

58 SENIOR COUNSEL
59 825 NE MULTNOMAH STE 1800
60 PORTLAND OR 97232
61 jordan.white@pacificorp.com

62 **W**

63 **PACIFICORP, DBA PACIFIC POWER**

64 PACIFIC POWER OREGON DOCKETS
65 825 NE MULTNOMAH STREET, STE 2000
66 PORTLAND OR 97232
67 oregondockets@pacificorp.com

68 **W**

69 **PORTLAND GENERAL ELECTRIC**

70 RANDALL DAHLGREN
71 RATES & REGULATORY AFFAIRS
72 121 SW SALMON ST 1WTC 0702
73 PORTLAND OR 97204
74 pge.opuc.filings@pgn.com

75 **DOUGLAS C TINGEY**


76 ASST GENERAL COUNSEL
77 121 SW SALMON 1WTC13
78 PORTLAND OR 97204
79 doug.tingey@pgn.com

80 **PUBLIC UTILITY COMMISSION**

81 **JUDY JOHNSON - CONFIDENTIAL**

82 PO BOX 2148
83 SALEM OR 97308-2148
84 judy.johnson@state.or.us

1 **RFI CONSULTING INC**
2 RANDALL J FALKENBERG - **CONFIDENTIAL**
3 PMB 362
4 8343 ROSWELL RD
5 SANDY SPRINGS GA 30350
6 consultrfi@aol.com

7 
8 Neoma Lane
9 Legal Secretary
10 Department of Justice
11 Regulated Utility & Business Section