

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com  
Suite 400  
333 SW Taylor  
Portland, OR 97204

November 2, 2009

*Via Electronic and US Mail*

Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
P.O. Box 2148  
Salem OR 97308-2148

Re: In the Matter of PACIFICORP Request for a General Rate Revision  
**Docket No. UE 210**

Dear Filing Center:

Enclosed please find the original and five (5) copies of the following exhibit on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket:

Response Testimony Exhibit of Ellen Blumenthal (ICNU/603).

Thank you for your assistance.

Sincerely,

/s/ Brendan E. Levenick  
Brendan E. Levenick

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Response Testimony Exhibit (ICNU/603) on behalf of the of the Industrial Customers of Northwest Utilities and the Citizens' Utility Board of Oregon upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 2nd day of November, 2009.

Sincerely,

/s/ Brendan E. Levenick  
Brendan E. Levenick

<b>(W) PACIFIC POWER &amp; LIGHT</b> JORDAN A WHITE JOELLE STEWARD SENIOR COUNSEL 825 NE MULTNOMAH STE 1800 PORTLAND OR 97232 jordan.white@pacificcorp.com joelle.steward@pacificcorp.com	<b>(W) PACIFICORP</b> OREGON DOCKETS 825 NE MULTNOMAH ST STE 2000 PORTLAND OR 97232 oregondockets@pacificcorp.com
<b>(W) MCDOWELL &amp; RACKNER PC</b> KATHERINE A MCDOWELL AMIE JAMIESON 520 SW SIXTH AVE - SUITE 830 PORTLAND OR 97204 katherine@mcd-law.com amie@mcclaw.com	<b>DEPARTMENT OF JUSTICE</b> JASON W JONES (C) ASSISTANT ATTORNEY 1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us
<b>PUBLIC UTILITY COMMISSION OF OREGON</b> JUDY JOHNSON PO BOX 2148 SALEM OR 97301 judy.johnson@state.or.us	<b>(W) CITIZEN'S UTILITY BOARD OF OREGON</b> G. CATRIONA MCCrackEN (C) GORDON FEIGHNER ROBERT JENKS (C) 610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub gordon@oregoncub.org bob@oregoncub.org

**(W) CABLE HUSTON BENEDICT ET AL**

J LAURENCE CABLE  
RICHARD LORENZ  
1001 SW 5TH AVE STE 2000  
PORTLAND OR 97204-1136  
lcable@chbh.com  
rlorenz@cablehuston.com

**(W) PORTLAND GENERAL ELECTRIC**

RANDALL DAHLGREN  
121 SW SALMON ST 1WTC 0702  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com

**(W) KLAMATH WATER USERS ASSOCIATION**

GREG ADDINGTON  
2455 PATTERSON ST - STE 3  
KLAMATH FALLS OR 97603  
greg@cvcwireless.net

**(W) PORTLAND GENERAL ELECTRIC**

DOUGLAS C TINGEY  
121 SW SALMON 1WTC13  
PORTLAND OR 97204  
doug.tingey@pgn.com

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 210**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER )  
 )  
Request for a General Rate Revision )  
 )  
\_\_\_\_\_ )

**ICNU/603**

**SUMMARY OF MS. BLUMENTHAL'S WORKPAPERS  
AND EXCERPTS OF WORKPAPERS**

**November 2, 2009**

ICNU Proposed Changes effect on Total Company Payroll Expense:

	Wages & Salaries	Pensions	Payroll Taxes	Capitalized Payroll	Payroll Expense
Remove 2.68% non-union wage increase	\$ (2,556,616)	\$ (822,515)	\$ (187,119)	\$ (1,018,157)	\$ (2,548,093)
Remove 3.8% non-union wage increase	\$ (6,817,446)	\$ (2,193,311)	\$ (498,969)	\$ (2,715,008)	\$ (6,794,718)
Remove bonus & incentive compensation	\$ (34,429,153)	\$ (14,611,439)	\$ (2,519,868)	\$ (14,720,409)	\$ (36,840,051)
Change allocation to Oregon	\$ (8,989,276)	\$ (2,892,033)	\$ (657,925)	\$ (3,579,926)	\$ (8,959,307)

PacifiCorp  
Oregon General Rate Case - December 2010  
Wage and Employee Benefit Adjustment

*PacifiCorp As Filed*

Account	Description	ACTUAL	ANNUALIZED	PRO FORMA
		12 Months Ended June 2008	12 Months Ended June 2008	12 Months Ended December 2010
5001XX	Regular Ordinary Time	394,638,780	400,416,123	418,756,380
5002XX	Overtime	60,283,599	61,166,125	63,967,717
5003XX	Premium Pay	5,797,917	5,882,796	6,152,245
<b>Subtotal for Escalation</b>		<b>460,720,296</b>	<b>467,465,044</b>	<b>488,876,342</b>
500110	Secondary Labor Adjustment	1,291,425	1,310,331	1,370,348
5005XX	Unused Leave Accrual	1,287,226	1,306,070	1,365,892
500600	Temporary/Contract Labor	1,503	1,503	1,503
500700	Severance/Redundancy (1)	(4,574,681)	(4,574,681)	(4,574,681)
500850	Other Salary/Labor Costs	7,390,214	7,390,214	7,390,214
50109X	JO Cutbacks	(1,273,641)	(1,292,286)	(1,351,477)
<b>Subtotal Bare Labor</b>		<b>464,842,341</b>	<b>471,606,194</b>	<b>493,078,141</b>
500400	Bonus	1,355,266	1,375,107	1,438,091
500410	Annual Incentive	30,121,575	30,121,575	32,991,063
<b>Total Incentive</b>		<b>31,476,841</b>	<b>31,496,681</b>	<b>34,429,153</b>
500250	Overtime Meals	960,299	960,299	960,299
501103	Joint Owner Pension Payment	122,444	122,444	122,444
501325	Physical Exam	882	882	882
502300	Education Assistance	351,622	351,622	351,622
580899	Mining Salary/Benefit Credit	(161,631)	(161,631)	(161,631)
<b>Total Other Labor</b>		<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>
<b>Subtotal Labor and Incentive</b>		<b>497,592,797</b>	<b>504,376,491</b>	<b>528,780,909</b>
50110X	Pensions - FAS 87	40,166,502	40,166,502	33,128,792
501115	SERP Plan	3,373,733	3,373,733	-
501150	Post Retirement Benefits - FAS 106	23,225,554	23,225,554	18,440,173
501160	Post Employment Benefits - FAS 112	4,612,511	4,612,511	6,502,600
<b>Total Pensions</b>		<b>71,378,300</b>	<b>71,378,300</b>	<b>58,071,565</b>
501102	Pension Administration	622,557	622,557	878,457
50112X	Medical	48,040,147	48,040,147	57,435,478
501175	Dental	2,536,926	2,536,926	2,210,453
501200	Vision	345,900	345,900	287,355
50122X	Life	1,205,551	1,205,551	1,056,043
501250	Stock/401(k)/ESOP	20,576,528	20,576,528	41,454,956
501251	401(k) Administration	391,766	391,766	388,939
501275	Accidental Death & Disability	64,937	64,937	59,582
501300	Long-Term Disability (2)	7,155,214	7,155,214	3,291,759
5016XX	Worker's Compensation	2,149,642	2,149,642	3,586,891
502900	Other Salary Overhead	1,373,804	1,373,804	1,398,127
<b>Total Benefits</b>		<b>84,462,972</b>	<b>84,462,972</b>	<b>112,048,039</b>
<b>Subtotal Pensions and Benefits</b>		<b>155,841,273</b>	<b>155,841,273</b>	<b>170,119,604</b>
580500	Payroll Tax Expense	33,486,017	33,964,157	35,706,180
580700	Payroll Tax Expense-Unemployment	2,995,132	2,995,132	2,995,132
580800	Other Payroll Taxes	141	141	141
<b>Total Payroll Taxes</b>		<b>36,481,290</b>	<b>36,959,430</b>	<b>38,701,452</b>
<b>Total Labor</b>		<b>689,915,360</b>	<b>697,177,193</b>	<b>737,601,966</b>
Non-Utility and Capitalized Labor		196,969,466	199,042,705	210,583,897
<b>Total Utility Labor</b>		<b>492,945,894</b>	<b>498,134,488</b>	<b>527,018,069</b>

Notes:

(1) No adjustment is made to coverage because it is covered in the MEHC Transition Adjustment

PacifiCorp  
Oregon General Rate Case - December 2010  
Wage and Employee Benefit Adjustment

**Exclude 2.68% Non-Union Wage Increase**

Account	Description	ACTUAL	ANNUALIZED	PRO FORMA	PRO FORMA	Change
		12 Months Ended June 2008	12 Months Ended June 2008	Adjusted 12 Months Ended December 2010	PPL As Filed	
5001XX	Regular Ordinary Time	394,638,780	398,318,581	416,579,035	418,756,380	(2,177,346)
5002XX	Overtime	60,283,599	60,845,712	63,635,113	63,967,717	(332,603)
5003XX	Premium Pay	5,797,917	5,851,979	6,120,256	6,152,245	(31,989)
<b>Subtotal for Escalation</b>		<b>460,720,296</b>	<b>465,016,272</b>	<b>486,334,404</b>	<b>488,876,342</b>	<b>(2,541,938)</b>
500110	Secondary Labor Adjustment	1,291,425	1,303,466	1,363,222	1,370,348	(7,125)
5005XX	Unused Leave Accrual	1,287,226	1,299,228	1,358,790	1,365,892	(7,102)
500600	Temporary/Contract Labor	1,503	1,503	1,503	1,503	-
500700	Severance/Redundancy (1)	(4,574,681)	(4,574,681)	(4,574,681)	(4,574,681)	-
500850	Other Salary/Labor Costs	7,390,214	7,390,214	7,390,214	7,390,214	-
50109X	JO Cutbacks	(1,273,641)	(1,285,517)	(1,344,450)	(1,351,477)	7,027
<b>Subtotal Bare Labor</b>		<b>464,842,341</b>	<b>469,150,486</b>	<b>490,529,002</b>	<b>493,078,141</b>	<b>(7,200)</b>
500400	Bonus	1,355,266	1,367,903	1,430,613	1,438,091	(7,477)
500410	Annual Incentive	30,121,575	30,121,575	32,991,063	32,991,063	-
<b>Total Incentive</b>		<b>31,476,841</b>	<b>31,489,478</b>	<b>34,421,676</b>	<b>34,429,153</b>	<b>(7,477)</b>
500250	Overtime Meals	960,299	960,299	960,299	960,299	-
501103	Joint Owner Pension Payment	122,444	122,444	122,444	122,444	-
501325	Physical Exam	882	882	882	882	-
502300	Education Assistance	351,622	351,622	351,622	351,622	-
580899	Mining Salary/Benefit Credit	(161,631)	(161,631)	(161,631)	(161,631)	-
<b>Total Other Labor</b>		<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>-</b>
<b>Subtotal Labor and Incentive</b>		<b>497,592,797</b>	<b>501,913,579</b>	<b>526,224,294</b>	<b>528,780,909</b>	<b>(2,556,616)</b>
50110X	Pensions - FAS 87	40,166,502	40,166,502	32,968,617	33,128,792	(160,175)
501115	SERP Plan	3,373,733	3,373,733	-	-	-
501150	Post Retirement Benefits - FAS 106	23,225,554	23,225,554	18,351,016	18,440,173	(89,157)
501160	Post Employment Benefits - FAS 112	4,612,511	4,612,511	6,471,161	6,502,600	(31,440)
<b>Total Pensions</b>		<b>71,378,300</b>	<b>71,378,300</b>	<b>57,790,794</b>	<b>58,071,565</b>	<b>(280,772)</b>
501102	Pension Administration	622,557	622,557	874,209	878,457	(4,247)
50112X	Medical	48,040,147	48,040,147	57,157,782	57,435,478	(277,696)
501175	Dental	2,536,926	2,536,926	2,199,766	2,210,453	(10,687)
501200	Vision	345,900	345,900	285,966	287,355	(1,389)
50122X	Life	1,205,551	1,205,551	1,050,938	1,056,043	(5,106)
501250	Stock/401(k)/ESOP	20,576,528	20,576,528	41,254,524	41,454,956	(200,432)
501251	401(k) Administration	391,766	391,766	387,058	388,939	(1,880)
501275	Accidental Death & Disability	64,937	64,937	59,294	59,582	(288)
501300	Long-Term Disability (2)	7,155,214	7,155,214	3,275,844	3,291,759	(15,915)
5016XX	Worker's Compensation	2,149,642	2,149,642	3,569,548	3,586,891	(17,342)
502900	Other Salary Overhead	1,373,804	1,373,804	1,391,367	1,398,127	(6,760)
<b>Total Benefits</b>		<b>84,462,972</b>	<b>84,462,972</b>	<b>111,506,295</b>	<b>112,048,039</b>	<b>(541,744)</b>
<b>Subtotal Pensions and Benefits</b>		<b>155,841,273</b>	<b>155,841,273</b>	<b>169,297,089</b>	<b>170,119,604</b>	<b>(822,515)</b>
580500	Payroll Tax Expense	33,486,017	33,964,157	35,533,543	35,706,180	(172,637)
580700	Payroll Tax Expense-Unemployment	2,995,132	2,995,132	2,980,650	2,995,132	(14,481)
580800	Other Payroll Taxes	141	141	140	141	(1)
<b>Total Payroll Taxes</b>		<b>36,481,290</b>	<b>36,959,430</b>	<b>38,514,334</b>	<b>38,701,452</b>	<b>(187,119)</b>
<b>Total Labor</b>		<b>689,915,360</b>	<b>694,714,282</b>	<b>734,035,716</b>	<b>737,601,966</b>	<b>(3,566,250)</b>
Non-Utility and Capitalized Labor		196,969,466	198,339,549	209,565,740	210,583,897	(1,018,157)
<b>Total Utility Labor Expense</b>		<b>492,945,894</b>	<b>496,374,733</b>	<b>524,469,976</b>	<b>527,018,069</b>	<b>(2,548,093)</b>

Notes:

- (1) No adjustment is made to severance because it is covered in the MEHC Transition Adjustment
- (2) Base period includes \$3,700,000 LTD cancellation fees.

PacifiCorp  
Oregon General Rate Case - December 2010  
Wage and Employee Benefit Adjustment

**Exclude 3.8% Non-Union Wage Increase**

Account	Description	ACTUAL	ANNUALIZED	PRO FORMA	PRO FORMA	Remove 3.8% Change
		12 Months Ended June 2008	12 Months Ended June 2008	12 Months Ended December 2010	PPL As Filed	
5001XX	Regular Ordinary Time	394,638,780	400,416,123	412,950,292	418,756,380	(5,806,088)
5002XX	Overtime	60,283,599	61,166,125	63,080,799	63,967,717	(886,917)
5003XX	Premium Pay	5,797,917	5,882,796	6,066,944	6,152,245	(85,301)
	<b>Subtotal for Escalation</b>	<b>460,720,296</b>	<b>467,465,044</b>	<b>482,098,035</b>	<b>488,876,342</b>	<b>(6,778,307)</b>
500110	Secondary Labor Adjustment	1,291,425	1,310,331	1,351,348	1,370,348	(19,000)
5005XX	Unused Leave Accrual	1,287,226	1,306,070	1,346,954	1,365,892	(18,938)
500600	Temporary/Contract Labor	1,503	1,503	1,503	1,503	-
500700	Severance/Redundancy (1)	(4,574,681)	(4,574,681)	(4,574,681)	(4,574,681)	-
500850	Other Salary/Labor Costs	7,390,214	7,390,214	7,390,214	7,390,214	-
50109X	JO Cutbacks	(1,273,641)	(1,292,286)	(1,332,739)	(1,351,477)	18,738
	<b>Subtotal Bare Labor</b>	<b>464,842,341</b>	<b>471,606,194</b>	<b>486,280,634</b>	<b>493,078,141</b>	<b>(19,200)</b>
500400	Bonus	1,355,266	1,375,107	1,418,151	1,438,091	(19,939)
500410	Annual Incentive	30,121,575	30,121,575	32,991,063	32,991,063	-
	<b>Total Incentive</b>	<b>31,476,841</b>	<b>31,496,681</b>	<b>34,409,214</b>	<b>34,429,153</b>	<b>(19,939)</b>
500250	Overtime Meals	960,299	960,299	960,299	960,299	-
501103	Joint Owner Pension Payment	122,444	122,444	122,444	122,444	-
501325	Physical Exam	882	882	882	882	-
502300	Education Assistance	351,622	351,622	351,622	351,622	-
580899	Mining Salary/Benefit Credit	(161,631)	(161,631)	(161,631)	(161,631)	-
	<b>Total Other Labor</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>-</b>
	<b>Subtotal Labor and Incentive</b>	<b>497,592,797</b>	<b>504,376,491</b>	<b>521,963,464</b>	<b>528,780,909</b>	<b>(6,817,446)</b>
50110X	Pensions - FAS 87	40,166,502	40,166,502	32,701,670	33,128,792	(427,122)
501115	SERP Plan	3,373,733	3,373,733	-	-	-
501150	Post Retirement Benefits - FAS 106	23,225,554	23,225,554	18,202,428	18,440,173	(237,745)
501160	Post Employment Benefits - FAS 112	4,612,511	4,612,511	6,418,764	6,502,600	(83,836)
	<b>Total Pensions</b>	<b>71,378,300</b>	<b>71,378,300</b>	<b>57,322,862</b>	<b>58,071,565</b>	<b>(748,703)</b>
501102	Pension Administration	622,557	622,557	867,131	878,457	(11,326)
50112X	Medical	48,040,147	48,040,147	56,694,976	57,435,478	(740,502)
501175	Dental	2,536,926	2,536,926	2,181,955	2,210,453	(28,499)
501200	Vision	345,900	345,900	283,650	287,355	(3,705)
50122X	Life	1,205,551	1,205,551	1,042,428	1,056,043	(13,615)
501250	Stock/401(k)/ESOP	20,576,528	20,576,528	40,920,487	41,454,956	(534,469)
501251	401(k) Administration	391,766	391,766	383,924	388,939	(5,014)
501275	Accidental Death & Disability	64,937	64,937	58,813	59,582	(768)
501300	Long-Term Disability (2)	7,155,214	7,155,214	3,249,319	3,291,759	(42,440)
5016XX	Worker's Compensation	2,149,642	2,149,642	3,540,646	3,586,891	(46,245)
502900	Other Salary Overhead	1,373,804	1,373,804	1,380,101	1,398,127	(18,026)
	<b>Total Benefits</b>	<b>84,462,972</b>	<b>84,462,972</b>	<b>110,603,430</b>	<b>112,048,039</b>	<b>(1,444,609)</b>
	<b>Subtotal Pensions and Benefits</b>	<b>155,841,273</b>	<b>155,841,273</b>	<b>167,926,293</b>	<b>170,119,604</b>	<b>(2,193,311)</b>
580500	Payroll Tax Expense	33,486,017	33,964,157	35,245,828	35,706,180	(460,351)
580700	Payroll Tax Expense-Unemployment	2,995,132	2,995,132	2,956,516	2,995,132	(38,616)
580800	Other Payroll Taxes	141	141	139	141	(2)
	<b>Total Payroll Taxes</b>	<b>36,481,290</b>	<b>36,959,430</b>	<b>38,202,484</b>	<b>38,701,452</b>	<b>(498,969)</b>
	<b>Total Labor</b>	<b>689,915,360</b>	<b>697,177,193</b>	<b>728,092,240</b>	<b>737,601,966</b>	<b>(9,509,726)</b>
	Non-Utility and Capitalized Labor	196,969,466	199,042,705	207,868,889	210,583,897	(2,715,008)
	<b>Total Utility Labor</b>	<b>492,945,894</b>	<b>498,134,488</b>	<b>520,223,351</b>	<b>527,018,069</b>	<b>(6,794,718)</b>



PacifiCorp  
Oregon General Rate Case - December 2010  
Wage and Employee Benefit Adjustment

**Remove Bonus & Incentive**

Account	Description	ACTUAL	ANNUALIZED	PRO FORMA With Change	PRO FORMA As Filed	Remove Bonus/incentives Change
		12 Months Ended June 2008	12 Months Ended June 2008	12 Months Ended December 2010	PPL As Filed	
5001XX	Regular Ordinary Time	394,638,780	400,416,123	418,756,380	418,756,380	-
5002XX	Overtime	60,283,599	61,166,125	63,967,717	63,967,717	-
5003XX	Premium Pay	5,797,917	5,882,796	6,152,245	6,152,245	-
	<b>Subtotal for Escalation</b>	<b>460,720,296</b>	<b>467,465,044</b>	<b>488,876,342</b>	<b>488,876,342</b>	-
500110	Secondary Labor Adjustment	1,291,425	1,310,331	1,370,348	1,370,348	-
5005XX	Unused Leave Accrual	1,287,226	1,306,070	1,365,892	1,365,892	-
500600	Temporary/Contract Labor	1,503	1,503	1,503	1,503	-
500700	Severance/Redundancy (1)	(4,574,681)	(4,574,681)	(4,574,681)	(4,574,681)	-
500850	Other Salary/Labor Costs	7,390,214	7,390,214	7,390,214	7,390,214	-
50109X	JO Cutbacks	(1,273,641)	(1,292,286)	(1,351,477)	(1,351,477)	-
	<b>Subtotal Bare Labor</b>	<b>464,842,341</b>	<b>471,606,194</b>	<b>493,078,141</b>	<b>493,078,141</b>	-
500400	Bonus	1,355,266	1,375,107	-	1,438,091	(1,438,091)
500410	Annual Incentive	30,121,575	30,121,575	-	32,991,063	(32,991,063)
	<b>Total Incentive</b>	<b>31,476,841</b>	<b>31,496,681</b>	-	<b>34,429,153</b>	<b>(34,429,153)</b>
500250	Overtime Meals	960,299	960,299	960,299	960,299	-
501103	Joint Owner Pension Payment	122,444	122,444	122,444	122,444	-
501325	Physical Exam	882	882	882	882	-
502300	Education Assistance	351,622	351,622	351,622	351,622	-
580899	Mining Salary/Benefit Credit	(161,631)	(161,631)	(161,631)	(161,631)	-
	<b>Total Other Labor</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>	-
	<b>Subtotal Labor and Incentive</b>	<b>497,592,797</b>	<b>504,376,491</b>	<b>494,351,756</b>	<b>528,780,909</b>	<b>(34,429,153)</b>
50110X	Pensions - FAS 87	40,166,502	40,166,502	30,971,762	33,128,792	(2,157,030)
501115	SERP Plan	3,373,733	3,373,733	-	-	-
501150	Post Retirement Benefits - FAS 106	23,225,554	23,225,554	17,239,525	18,440,173	(1,200,648)
501160	Post Employment Benefits - FAS 112	4,612,511	4,612,511	6,079,213	6,502,600	(423,387)
	<b>Total Pensions</b>	<b>71,378,300</b>	<b>71,378,300</b>	<b>50,755,623</b>	<b>58,071,565</b>	<b>(7,315,943)</b>
501102	Pension Administration	622,557	622,557	821,260	878,457	(57,197)
50112X	Medical	48,040,147	48,040,147	53,695,829	57,435,478	(3,739,649)
501175	Dental	2,536,926	2,536,926	2,066,530	2,210,453	(143,924)
501200	Vision	345,900	345,900	268,645	287,355	(18,710)
50122X	Life	1,205,551	1,205,551	987,284	1,056,043	(68,759)
501250	Stock/401(k)/ESOP	20,576,528	20,576,528	38,755,806	41,454,956	(2,699,150)
501251	401(k) Administration	391,766	391,766	363,615	388,939	(25,324)
501275	Accidental Death & Disability	64,937	64,937	55,702	59,582	(3,879)
501300	Long-Term Disability (2)	7,155,214	7,155,214	3,077,431	3,291,759	(214,328)
5016XX	Worker's Compensation	2,149,642	2,149,642	3,353,347	3,586,891	(233,544)
502900	Other Salary Overhead	1,373,804	1,373,804	1,307,094	1,398,127	(91,033)
	<b>Total Benefits</b>	<b>84,462,972</b>	<b>84,462,972</b>	<b>104,752,543</b>	<b>112,048,039</b>	<b>(7,295,496)</b>
	<b>Subtotal Pensions and Benefits</b>	<b>155,841,273</b>	<b>155,841,273</b>	<b>155,508,165</b>	<b>170,119,604</b>	<b>(14,611,439)</b>
580500	Payroll Tax Expense	33,486,017	33,964,157	33,381,335	35,706,180	(2,324,845)
580700	Payroll Tax Expense-Unemployment	2,995,132	2,995,132	2,800,117	2,995,132	(195,014)
580800	Other Payroll Taxes	141	141	132	141	(9)
	<b>Total Payroll Taxes</b>	<b>36,481,290</b>	<b>36,959,430</b>	<b>36,181,584</b>	<b>38,701,452</b>	<b>(2,519,868)</b>
	<b>Total Labor</b>	<b>689,915,360</b>	<b>697,177,193</b>	<b>686,041,506</b>	<b>737,601,966</b>	<b>(51,560,460)</b>
	Non-Utility and Capitalized Labor	196,969,466	199,042,705	196,872,689	210,583,897	(14,720,409)
	<b>Total Utility Labor Expense</b>	<b>492,945,894</b>	<b>498,134,488</b>	<b>489,168,817</b>	<b>527,018,069</b>	<b>(36,840,051)</b>

Notes:

- (1) No adjustment is made to severance because it is covered in the MEHC Transition Adjustment
- (2) Base period includes \$3,700,000 LTD cancellation fees.

PacifiCorp  
Oregon General Rate Case - December 2010  
Wage and Employee Benefit Adjustment

*Change Allocation to Oregon*

Account	Description	ACTUAL		ANNUALIZED		PRO FORMA		Oregon - 27.8%	Difference
		12 Months Ended June 2008	12 Months Ended June 2008	12 Months Ended June 2008	12 Months Ended December 2010	12 Months Ended December 2010	December 2010		
5001XX	Regular Ordinary Time	394,638,780	400,416,123	418,756,380	418,756,380	63,967,717	63,967,717	-	-
5002XX	Overtime	60,283,599	61,166,125	6,152,245	6,152,245	-	-	-	-
5003XX	Premium Pay	5,797,917	5,882,796	488,876,342	488,876,342	-	-	-	-
	<b>Subtotal for Escalation</b>	<b>460,720,296</b>	<b>467,465,044</b>	<b>493,078,141</b>	<b>493,078,141</b>	<b>144,218,521</b>	<b>144,218,521</b>	<b>135,907,623</b>	<b>(8,310,898)</b>
500110	Secondary Labor Adjustment	1,291,425	1,310,331	1,370,348	1,370,348	-	-	-	-
5005XX	Unused Leave Accrual	1,287,226	1,306,070	1,365,892	1,365,892	-	-	-	-
500600	Temporary/Contract Labor	1,503	1,503	1,503	1,503	-	-	-	-
500700	Severance/Redundancy (1)	(4,574,681)	(4,574,681)	(4,574,681)	(4,574,681)	-	-	-	-
500850	Other Salary/Labor Costs	7,390,214	7,390,214	7,390,214	7,390,214	-	-	-	-
50109X	JO Cutbacks	(1,273,641)	(1,292,286)	(1,351,477)	(1,351,477)	-	-	-	-
	<b>Subtotal Bare Labor</b>	<b>464,842,341</b>	<b>471,606,194</b>	<b>493,078,141</b>	<b>493,078,141</b>	<b>145,458,051</b>	<b>145,458,051</b>	<b>137,075,723</b>	<b>(8,382,328)</b>
500400	Bonus	1,355,266	1,375,107	1,438,091	1,438,091	-	-	-	-
500410	Annual Incentive	30,121,575	30,121,575	32,991,063	32,991,063	-	-	-	-
	<b>Total Incentive</b>	<b>31,476,841</b>	<b>31,496,681</b>	<b>34,429,154</b>	<b>34,429,154</b>	<b>10,156,600</b>	<b>10,156,600</b>	<b>9,571,305</b>	<b>(585,296)</b>
500250	Overtime Meals	960,299	960,299	960,299	960,299	-	-	-	-
501103	Joint Owner Pension Payment	122,444	122,444	122,444	122,444	-	-	-	-
501325	Physical Exam	882	882	882	882	-	-	-	-
502300	Education Assistance	351,622	351,622	351,622	351,622	-	-	-	-
580899	Mining Salary/Benefit Credit	(161,631)	(161,631)	(161,631)	(161,631)	-	-	-	-
	<b>Total Other Labor</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>1,273,616</b>	<b>375,717</b>	<b>375,717</b>	<b>354,065</b>	<b>(21,651)</b>
	<b>Subtotal Labor and Incentive</b>	<b>497,592,797</b>	<b>504,376,491</b>	<b>528,780,910</b>	<b>528,780,910</b>	<b>155,990,368</b>	<b>155,990,368</b>	<b>147,001,093</b>	<b>(8,989,276)</b>
50110X	Pensions - FAS 87	40,166,502	40,166,502	33,128,792	33,128,792	-	-	-	-
501115	SERP Plan	3,373,733	3,373,733	18,440,173	18,440,173	-	-	-	-
501150	Post Retirement Benefits - FAS 106	23,225,554	23,225,554	6,502,600	6,502,600	-	-	-	-
501160	Post Employment Benefits - FAS 112	4,612,511	4,612,511	58,071,565	58,071,565	-	-	-	-
	<b>Total Pensions</b>	<b>71,378,300</b>	<b>71,378,300</b>	<b>112,048,039</b>	<b>112,048,039</b>	<b>17,131,112</b>	<b>17,131,112</b>	<b>16,143,895</b>	<b>(987,217)</b>
501102	Pension Administration	622,557	622,557	878,457	878,457	-	-	-	-
50112X	Medical	48,040,147	48,040,147	57,435,478	57,435,478	-	-	-	-
501175	Dental	2,536,926	2,536,926	2,210,453	2,210,453	-	-	-	-
501200	Vision	345,900	345,900	287,355	287,355	-	-	-	-
50122X	Life	1,205,551	1,205,551	1,056,043	1,056,043	-	-	-	-
501250	Stock/401(k)/ESOP	20,576,528	20,576,528	41,454,956	41,454,956	-	-	-	-
501251	401(k) Administration	391,766	391,766	388,939	388,939	-	-	-	-
501275	Accidental Death & Disability	64,937	64,937	59,582	59,582	-	-	-	-
501300	Long-Term Disability (1)	7,155,214	7,155,214	3,291,759	3,291,759	-	-	-	-
5016XX	Worker's Compensation (2)	2,149,642	2,149,642	3,586,891	3,586,891	-	-	-	-
502900	Other Salary Overhead	1,373,804	1,373,804	1,398,127	1,398,127	-	-	-	-
	<b>Total Benefits</b>	<b>84,462,972</b>	<b>84,462,972</b>	<b>112,048,039</b>	<b>112,048,039</b>	<b>33,054,171</b>	<b>33,054,171</b>	<b>31,149,355</b>	<b>(1,904,817)</b>
	<b>Subtotal Pensions and Benefits</b>	<b>155,841,273</b>	<b>155,841,273</b>	<b>170,119,604</b>	<b>170,119,604</b>	<b>50,185,283</b>	<b>50,185,283</b>	<b>47,293,250</b>	<b>(2,892,033)</b>
580500	Payroll Tax Expense	33,486,017	33,964,157	35,706,180	35,706,180	-	-	-	-
580700	Payroll Tax Expense-Unemployment	2,995,132	2,995,132	2,995,132	2,995,132	-	-	-	-
580800	Other Payroll Taxes	141	141	141	141	-	-	-	-
	<b>Total Payroll Taxes</b>	<b>36,481,290</b>	<b>36,959,430</b>	<b>38,701,452</b>	<b>38,701,452</b>	<b>11,416,928</b>	<b>11,416,928</b>	<b>10,759,004</b>	<b>(657,925)</b>
	<b>Total Labor</b>	<b>689,915,360</b>	<b>697,177,193</b>	<b>737,601,966</b>	<b>737,601,966</b>	<b>217,592,580</b>	<b>217,592,580</b>	<b>205,053,346</b>	<b>(12,539,233)</b>
	Non-Utility and Capitalized Labor	196,969,466	199,042,705	210,583,897	210,583,897	62,122,250	62,122,250	58,542,323	(3,579,926)
	<b>Total Utility Labor</b>	<b>492,945,894</b>	<b>498,134,488</b>	<b>527,018,069</b>	<b>527,018,069</b>	<b>155,470,330</b>	<b>155,470,330</b>	<b>146,511,023</b>	<b>(8,959,307)</b>