

July 19, 2022

***VIA ELECTRONIC FILING  
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Public Utility Commission of Oregon  
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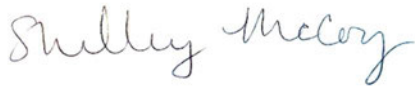
**Re: UE 399—PacifiCorp's Reply Testimony and Exhibits**

PacifiCorp d/b/a Pacific Power hereby submits for filing the Reply Testimony and Exhibits of Ms. Joelle Steward, Ms. Nikki L. Kobliha, Ms. Ann E. Bulkley, Mr. Michael G. Wilding, Mr. Allen Berreth, Mr. Matthew McVee, Mr. Kenneth L. Elder, Jr., Mr. James Owen, Ms. Sherona L. Cheung, and Mr. Robert M. Meredith.

Included with this filing are CDs containing the confidential and non-confidential electronic workpapers. Confidential material in support of the filing has been provided to parties electronically under Order No. 22-044.

Please direct any informal correspondence and questions regarding this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Shelley McCoy  
Director, Regulations

Enclosures

Cc: UE 399 Service List

## CERTIFICATE OF SERVICE

I certify that a true and correct copy of **PacifiCorp's Reply Testimony** was served on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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Dated this 19<sup>th</sup> day of July, 2022.

  
 Jennifer Angell  
 Regulatory Project Manager, Regulatory  
 Affairs

Docket No. UE 399  
Exhibit PAC/1200  
Witness: Joelle R. Steward

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Joelle R. Steward

July 2022

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1 **Q. Are you the same Joelle R. Steward who previously submitted direct testimony**  
2 **in this proceeding on behalf of PacifiCorp d/b/a Pacific Power (PacifiCorp or the**  
3 **Company)?**

4 A. Yes.

5 **I. PURPOSE AND SUMMARY**

6 **Q. What is the purpose your reply testimony?**

7 A. My reply testimony provides PacifiCorp's general policy positions. I summarize the  
8 Company's reply case reflecting certain corrections and information updates. I also  
9 respond to various Public Utility Commission of Oregon (Commission) Staff and  
10 intervenor (collectively, the Filing Parties) positions in opening testimony, and  
11 provide recommendations to the Commission for its decision in this proceeding.

12 **Q. Which parties to the rate case filed opening testimony?**

13 A. The following parties filed opening testimony: Staff, the Alliance of Western Energy  
14 Consumers (AWEC), the Oregon Citizens' Utility Board (CUB), AWEC-CUB, the  
15 Northwest & Intermountain Power Producers Coalition, Klamath Water Users  
16 Association and the Oregon Farm Bureau Federation, Small Business Utility  
17 Advocates (SBUA), Walmart, Inc., and Vitesse, LLC.

18 **Q. Please summarize your reply testimony.**

19 A. In my reply testimony, I address and make recommendations regarding the following  
20 topics:

- 21 • Overall Reasonableness of Rates
- 22 • Amortization of COVID-19 Deferral;
- 23 • Wildfire Mitigation and Vegetation Management Costs;



- 1 • Renewable Adjustment Clause Deferrals;
- 2 • Depreciation/Exit Orders; and
- 3 • Changes to the Transition Adjustment Mechanism (TAM) and the Power Cost
- 4 Adjustment Mechanism (PCAM).

5 **Q. Please identify PacifiCorp’s witnesses providing reply testimony.**

6 A. In addition to myself, the following witnesses are submitting reply testimony:

- 7 • PAC 1300, Nikki L. Kobliva – Cost of Debt, Capital Structure, Taxes, Pensions
- 8 • PAC 1400, Ann E. Bulkley – Cost of Equity
- 9 • PAC 1500, Michael G. Wilding – PCAM, TAM
- 10 • PAC 1600, Allen Berreth – Wildfire and Vegetation Management
- 11 • PAC 1700, Matthew McVee – Schedule 273, Accelerated Commitment Tariff, the
- 12 Company’s proposed voluntary renewable energy tariff
- 13 • PAC 1800, Kenneth L. Elder, Jr. – Load Forecast
- 14 • PAC 1900, James Owen – Fuel Stock, Mining and Environmental Remediation
- 15 Costs
- 16 • PAC 2000, Sherona L. Cheung – Revenue Requirement
- 17 • PAC 2100, Robert M. Meredith – Cost of Service and Pricing

18 **II. GENERAL POLICY ISSUES**

19 **A. Reasonableness of Overall Rate Change**

20 **Q. Has the Company updated its revenue requirement to reflect corrections and**  
21 **updates?**

22 A. Yes. The Company’s initial filing supported a base rate revenue requirement increase  
23 of \$84.4 million, which includes the impact of moving the Oregon Corporate Activity

1 Tax (OCAT) into base rates, or \$82.2 million net of the OCAT change and the  
2 rebalancing of the rate mitigation adjustment. The base rate revenue requirement  
3 increase in the Company's initial filing also included \$7.7 million in proposed  
4 amortization of approved deferrals. The Company's reply filing supports an increase  
5 of \$93.8 million, including OCAT and PacifiCorp's proposed amortization of  
6 deferrals. This reflects an increase of \$9.7 million from the Company's initial filing  
7 due to the current rising cost environment. Because the Company is agreeing to  
8 move the amortization of deferrals to separate schedules as proposed by Staff, the  
9 reply revenue requirement without the deferrals is \$86.4 million.

10 **Q. What corrections and updates are included in the Company's reply filing?**

11 A. As explained in more detail in the reply testimony of Ms. Sherona L. Cheung, the  
12 reply revenue requirement reflects the updates and corrections outlined in Table 1.

1 **Table 1: Reply Adjustments to the Company’s Initial Revenue Requirement**

	GRC
<b>Revenue Requirement (FILED)</b>	<b>\$ 84.4</b>
<b>Corrections:</b>	
Interest Sync Correction	(1.3)
Remove AMI Replacement Amort.	(1.0)
Remove Clean Fuels Prog. Amort.	(1.3)
<b>Updates:</b>	
Cost of L/T Debt	7.0
Present Revenues Update	3.5
Escalation Factors	2.8
Pension Non-Service Exp.	1.8
TAM Revenue Sensitive	0.9
Wages & Benefits	0.7
Deferral Amort. to Tariff	(7.7)
Jurisdictional Loads Update	(2.1)
Fuel Stock Update	(0.5)
Remove Merwin In-Lieu	(0.4)
OCAT & Metro BIT	(0.3)
Other Updates	(0.1)
<b>Reply Revenue Requirement</b>	<b>\$ 86.4</b>
<b>Amortization of Deferrals</b>	<b>\$ 7.4</b>
<b>Total Rev. Req + Amort. (Reply)</b>	<b>\$ 93.8</b>

2 **Q. Please provide a general explanation of the drivers behind the increase in the**  
3 **reply revenue requirement.**

4 **A.** In short, the increase is driven primarily by market pressures including interest rates  
5 impacting the cost of long-term debt and pension expense, and other cost increases.  
6 Additionally, the Company has identified an update and correction to present  
7 revenues that is driving a \$3.5 million increase. Corresponding reductions are from  
8 corrections and a jurisdictional load update.

1 **Q. Notwithstanding the increase in its reply revenue requirement, is PacifiCorp**  
2 **willing to cap its increase at the revenue requirement proposed in PacifiCorp’s**  
3 **initial filing?**

4 A. Yes. PacifiCorp’s reply filing supports the new revenue requirement of \$86.4 million  
5 and PacifiCorp will establish the reasonableness of base rates at that level. Therefore,  
6 any adjustments the Commission adopts should be applied to the \$86.4 million  
7 request. But if the final revenue requirement exceeds the \$84.4 million request  
8 contained in the Company’s initial filing, less the deferral amortization, the Company  
9 will agree to cap the increase at \$76.7 million (\$84.4 million less the \$7.7 million in  
10 deferral amortizations). This approach moderates the impact of this rate case on  
11 customers and ensures that customers will not experience a higher base rate increase  
12 than contained in the Company’s Notice Proposed Rate Revision, published in March  
13 2022 in compliance with OAR 860-022-0017.

14 **Q. Staff has proposed to amortize the Company’s COVID-19 deferral in this case.**  
15 **Is that included in the Company’s reply revenue requirement?**

16 A. No. Over a four-year period, Staff’s proposal to amortize the COVID-19 deferral  
17 increases the revenue requirement by an additional \$4.7 million annually. While the  
18 Company is open to Staff’s proposal, as I discuss below, this is not a part of the  
19 Company’s request, so the Company has excluded it from its proposed revenue  
20 requirement on reply. The amortization of this deferral through a separate  
21 supplemental schedule is, however, included in the Company’s pricing models for this  
22 case. I discuss the COVID-19 deferral in more detail below.

1 **Q. Please provide a comparison of the revenue change proposed by the Filing**  
2 **Parties in their opening testimony.**

3 A. The revenue change proposed by each of the parties as stated in their testimonies is  
4 indicated in Table 2 below.

5 **Table 2: Filing Parties' Monetary Positions**

Filing Party	Proposed Revenue Change (in millions)
Company – <i>as filed</i>	\$84.39
Staff (1)	\$41.61
AWEC (2)	(\$2.96)
(1) Ex. Staff/100, Muldoon/4, Table 1	
(2) Ex. AWEC/100, Mullins/3, Table 1.	

6 Other Filing Parties seek adjustments but did not make an overall revenue  
7 requirement proposal.

8 **Q. What are the major drivers causing the divergence between Staff's position and**  
9 **the Company's filing?**

10 A. Staff's largest adjustments relate to cost of equity, capital structure, pensions costs  
11 and labor expense. As outlined by Company witnesses Ms. Nikki L. Kobliha and Ms.  
12 Ann E. Bulkley, the Company's financing costs are increasing at a time where access  
13 to capital is critical to meet Oregon's policy goals around decarbonization and  
14 wildfire mitigation. As outlined by Ms. Cheung, the Company's labor costs are  
15 similarly increasing as it faces a growing need for a workforce capable of meeting  
16 transformative challenges.

17 Reducing the Company's financing and labor costs at this critical juncture  
18 undermines the Company's efforts to comply with two recent Oregon legislative  
19 mandates: emissions reductions required by House Bill (HB) 2021 and wildfire

1 mitigation required by Senate Bill (SB) 762. PacifiCorp's continued transition to a  
2 non-emitting energy resource mix under HB 2021, coupled with the investments  
3 necessary to protect its system and customers from the increasing wildfire threat and  
4 increasing costs of vegetation management under SB 762 are major drivers of this  
5 case.

6 **Q. Please comment on AWEC's proposal to reduce PacifiCorp's revenue**  
7 **requirement by approximately \$87 million for a rate decrease of approximately**  
8 **\$3 million.**

9 A. In the current context, AWEC's proposal to decrease PacifiCorp's rates is manifestly  
10 unreasonable. AWEC has proposed over 20 adjustments in this case, which include  
11 challenging cost items that have been in rates for many years (such as the costs of the  
12 Trapper Mine) and costs recently found to be prudent and beneficial for customers  
13 (such as the wind project deferrals). As a whole, AWEC's adjustments appear  
14 designed to drive down the Company's revenue requirement, irrespective of the  
15 reasonableness of the Company's costs.

16 **Q. Please explain why AWEC's proposal to decrease PacifiCorp's rates at this time**  
17 **is so extreme.**

18 A. This is only the second rate case PacifiCorp has filed since 2013. In Order No. 20-  
19 473 in PacifiCorp's last general rate case, docket UE 374, the Commission allowed a  
20 base rate increase of \$20.9 million, or 1.6 percent.<sup>1</sup> Since 2013, inflation rates  
21 averaged 2.55 percent per year, for a cumulative increase of 25.47 percent.<sup>2</sup>

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<sup>1</sup> *In the Matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision*, Docket No. UE 374, Order No. 20-473 (Dec. 18, 2020).

<sup>2</sup> [https://www.bls.gov/data/inflation\\_calculator.htm](https://www.bls.gov/data/inflation_calculator.htm).

1 PacifiCorp's proposed rate increase of 6.8 percent in this case would still leave the  
2 Company in a position where its total rate increases since 2013 are only a fraction of  
3 the overall inflation it has experienced. In this context, a proposal to decrease  
4 PacifiCorp's rates is facially unreasonable.

5 **Q. Do PacifiCorp's recent results of operations underscore the need for a rate**  
6 **increase in this case?**

7 A. Yes. PacifiCorp filed its 2021 Results of Operations in April 2022. PacifiCorp's  
8 Type 1 (adjusted actual) return on equity (ROE) was 5.60 percent. PacifiCorp's Type  
9 3 (normalized pro forma) ROE was 5.48 percent. PacifiCorp's 2021 results in  
10 Oregon were the worst of all the states in which it operates.

11 **Q. Staff raises concerns about the combined impact of the general rate increase, a**  
12 **net power cost increase in the TAM, and deferral amortizations, claiming that**  
13 **the aggregate increase could lead to rate shock.<sup>3</sup> But Staff also claims that it**  
14 **may not have all the information necessary to analyze this issue.<sup>4</sup> Have you**  
15 **provided information regarding the aggregated rate impacts of different**  
16 **Company filings?**

17 A. Yes. In response to Bench Request 5, PacifiCorp provided this information.  
18 PacifiCorp's response demonstrates that, in addition to the rate case, the Company is  
19 seeking rate changes in the TAM (5.6 percent), the PCAM (4.0 percent) and under the  
20 Wildfire Mitigation and Vegetation Management mechanism (WMVM) (1.1 percent).  
21 PacifiCorp has also provided additional information to Staff in discovery.

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<sup>3</sup> Staff/100, Muldoon/10.

<sup>4</sup> Staff/100, Muldoon/11.

1 **Q. Does the Company have any updates to Bench Request 5?**

2 A. Yes. The Company recently amended its PCAM filing, so that it now results in a  
3 4.2 percent rate change request in that docket. In addition, as a part of the Company's  
4 automatic adjustment clause (AAC) filing for Wildfire Protection Plan (WPP) costs,  
5 the Company is seeking incremental 2022 WPP expenses of \$19.9 million or  
6 1.6 percent.

7 **Q. Is the Company seeking to amortize deferrals other than those included in the**  
8 **general rate case request?**

9 A. No. Staff has proposed to amortize the COVID-19 deferral, however, which I address  
10 below.

11 **Q. Has the Company now reached an agreement in principle to resolve the TAM?**

12 A. Yes. Parties have worked together to moderate the expected net power cost (NPC)  
13 increase and help address concerns about the combined rate impacts of the TAM and  
14 this general rate case.

15 **Q. Has the Company proposed any programs which could help mitigate the impact**  
16 **of rate increase on low-income customers?**

17 A. Yes. In June 2022, the Company filed Advice No. 22-008, requesting authorization to  
18 implement PacifiCorp's interim low-income bill discount to residential customers  
19 consistent with HB 2475.<sup>5</sup> PacifiCorp's proposed low-income discount would help  
20 reduce energy burden for customers experiencing lower than average income. For  
21 some residential customers, this program will mitigate the impact of cost increases  
22 proposed in this case.

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<sup>5</sup> Schedule 7 Low-Income Bill Discount and Schedule 92 Low-Income Discount Cost Recovery Adjustment, Advice No 22-008 (June 16, 2022).



1 **Q. Is the Company open to other approaches to mitigate the rate increase in this**  
2 **case?**

3 A. Yes. PacifiCorp is willing to consider other approaches to reducing the impact of this  
4 case on customers. This could include some version of AWEC's proposal to decrease  
5 depreciation expense by extending the useful lives of certain generation resources.  
6 As addressed below, the Company is still analyzing AWEC's proposal related to Jim  
7 Bridger Units 1 and 2 in light of their conversion to natural gas.

8 **B. Amortization of COVID-19 Deferral**

9 **Q. Please summarize Staff's proposal to amortize the Company's deferral for**  
10 **COVID-19-related expenses.**

11 A. As Ms. Cheung explains in more detail, Staff is proposing to begin amortizing  
12 amounts accrued in the COVID-19 deferral, docket UM 2063, for 2020 and 2021  
13 over a three-year amortization period, with an earnings threshold of 50 basis points  
14 below ROE for category (a) expenses and at ROE for all other expenses. Staff  
15 proposes a disallowance of \$376,593 in the Arrearage Management Program (AMP)  
16 associated with high-usage customers. Staff's application of the earnings test did not  
17 result in a disallowance of any of the COVID-19 deferral for 2020 and 2021.<sup>6</sup>

18 **Q. Please respond generally to Staff's proposal.**

19 A. While the Company does not object to Staff's basic proposal to begin amortizing the  
20 first two years of the COVID-19 deferral, the Company strongly disagrees with the  
21 disallowance for AMP expense. As Mr. Robert Meredith explains, at the urging of  
22 Staff and other parties, the Company implemented its COVID-19 programs quickly

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<sup>6</sup> Staff/200, Fox/16-26.

1 and offered them universally to covered groups. The after-the-fact claim that  
2 PacifiCorp should have more carefully administered and audited the program is  
3 disconnected from the reality that this was an emergency program designed to  
4 provide relief to all residential customers. At the time of implementation, no party  
5 ever flagged high-usage customers as potentially ineligible for the program.

6 In addition, even though it does not impact the amortization of the deferral in  
7 this case, the Company disagrees that the earnings test for large emergency deferrals  
8 should be set below ROE because this effectively caps the Company's return below  
9 its authorized level.

10 **Q. CUB's witness, Mr. William Gehrke, recommends delaying addressing**  
11 **PacifiCorp's deferral for COVID-19 until 2023 after the proposed rate effective**  
12 **date of this case, to enable all three years of deferred costs (2020-2022) to be**  
13 **amortized simultaneously.<sup>7</sup> Please respond.**

14 A. To meld CUB's proposal to delay amortization of the COVID-19 deferral by one year  
15 with Staff's position to commence amortization in 2023, the Company proposes to  
16 apply a four-year amortization period to the COVID-19 deferral instead of the three-  
17 year period proposed by Staff to reduce the rate impact.

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<sup>7</sup> CUB/200, Gehrke/36.

1 **Q. SBUA witness, Mr. William A. Steele, recommends delaying addressing**  
2 **PacifiCorp’s deferral for COVID-19 as the Company did not include this issue in**  
3 **its original filing and, therefore did not give adequate notice to the Commission**  
4 **or ratepayers that it would be including this issue in this docket.<sup>8</sup> Do you believe**  
5 **SBUA’s reason for delaying COVID-19 deferrals is reasonable?**

6 A. No. Staff was clear in its response to PacifiCorp’s motion for consolidation that it  
7 intended to address amortization of the 2020 and 2021 COVID-19 deferrals in this  
8 case. Staff’s response was filed on March 30, 2022, so SBUA has had more than  
9 three months’ notice that this issue would be reviewed in this case.<sup>9</sup>

10 **Q. Mr. Steele raises the concern that small businesses will be unfairly saddled with**  
11 **costs created by the residential class as related to COVID-19 costs on the system;**  
12 **therefore, Mr. Steele recommends that intervenor funding be fairly apportioned**  
13 **among qualified intervenors to ensure intervenor compensation for**  
14 **representation of Schedule 23 customers.<sup>10</sup> Is SBUA’s recommendation**  
15 **reasonable?**

16 A. No. Eligibility for intervenor funding is covered by Commission statutes and  
17 regulations. Amortization of the COVID-19 deferral does not override those  
18 guidelines.

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<sup>8</sup> SBUA/100, Steele/20.

<sup>9</sup> Corrected Staff Response to PacifiCorp Motion to Consolidate, Docket No. UE 399 (Mar. 30, 2022).

<sup>10</sup> SBUA/100, Steele/21-22.

1           **C.     Wildfire Mitigation and Vegetation Management Costs**

2   **Q.     Does Staff support the Company’s capital investment and operation and**  
3           **maintenance expense levels in this case for wildfire mitigation and vegetation**  
4           **management?**

5   A.     Yes. As addressed in the reply testimony of Mr. Allen Berreth, Staff does not contest  
6           the reasonableness or prudence of the Company’s wildfire mitigation and vegetation  
7           management costs.<sup>11</sup> Staff does, however, disagree with the Company’s level of costs  
8           in Oregon and the Company’s proposed changes to the Wildfire Mitigation and  
9           Vegetation Management mechanism (WMVM). I respond to the policy issues Staff  
10          raises, while Mr. Berreth addresses cost and operational issues.

11 **Q.     Can you summarize the Company’s positions on wildfire mitigation and**  
12           **vegetation management cost recovery?**

13 A.     Yes. The Company recommends that the Commission:

- 14           • Reflect the \$20 million associated with WPP implementation in 2023 in base  
15           rates, with recovery for incremental WPP costs through the Company’s proposed  
16           SB 762 AAC, Schedule 190;
- 17           • Reflect the full amount of the balance of the Company’s vegetation management  
18           costs (\$50 million) in base rates, without an arbitrary disallowance of costs based  
19           on the growth of Oregon costs relative to other states (addressed by Mr. Berreth in  
20           his reply testimony), and without a 10 percent “holdback” subject to the WMVM;
- 21           • Require PacifiCorp to track and report its expenditures and defer unspent dollars;
- 22           • As addressed by Mr. Berreth in his reply testimony, reset (increase) the thresholds

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<sup>11</sup> Staff /1300, Moore/3,5.

1 in the WMVM for 2022 and 2023 to reflect that PacifiCorp is transitioning to a  
2 more accelerated vegetation management cycle (from four years to three years,  
3 starting in 2022) and needs a transition period to get to “steady state” violation  
4 levels;

- 5 • As also addressed by Mr. Berreth in his reply testimony, apply the WMVM  
6 through the transition period (end of 2024) by counting violations only in areas  
7 that have been trimmed under the three-year cycle program; and
- 8 • Replace the earnings thresholds in the WMVM with a sharing mechanism for  
9 costs incremental to those included in base rates.

10 **Q. Starting with relevant updates, in your direct testimony you indicated that**  
11 **PacifiCorp filed its WPP on December 30, 2021. Has the Commission now**  
12 **approved PacifiCorp’s WPP?**

13 A. Yes. In April 2022, the Commission approved PacifiCorp’s WPP without conditions  
14 in Order No. 22-131.<sup>12</sup>

15 **Q. Has the Company filed for cost recovery for the first year of the WMVM, 2021?**

16 A. Yes. On May 5, 2022, the Company filed Advice No. 22-006, to recover  
17 \$14.3 million in incremental costs under the WMVM.<sup>13</sup> Based on the Company’s  
18 significant under-earning in 2021, the performance metrics and associated earnings  
19 thresholds in the WMVM do not limit the Company’s recovery.

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<sup>12</sup> *In the Matter of PacifiCorp, dba Pacific Power, 2022 Wildfire Mitigation Plan*, Docket No. UM 2207, Order No. 22-131 (April 28, 2022).

<sup>13</sup> *Wildfire Mitigation and Vegetation Management Cost Recovery Adjustment*, Advice No. 22-006 (May 5, 2022).

1 **Q. In your direct testimony, you stated that the Company intended to file an**  
2 **application for approval of an AAC for recovery of costs related to**  
3 **implementation of its WPP. Has the Company now made this filing?**

4 A. Yes. On July 12, 2022, the Company filed its application for an AAC for recovery of  
5 WPP implementation costs. This filing was docketed as UE 407/ Advice 22-009.<sup>14</sup>  
6 The filing includes incremental WPP implementation costs of \$19.9 million for 2022,  
7 or 1.6 percent, which reflects PacifiCorp's forecast WPP expense for 2022 (but  
8 excludes 2022 capital, which will be added after the investments go into service).

9 **Q. Please describe the Company's AAC filing.**

10 A. This filing proposes a new rate tariff Schedule 190, a balancing account, and an AAC  
11 for the WPP. The Company will make an annual advice filing adjusting Schedule 190  
12 rates to reflect collection for the Company's projections of the WPP incremental  
13 expense and capital investment for the coming year, as well as incorporating any  
14 variances from the previous year. The forecast WPP expense for the next calendar  
15 year will be based on the annual WPP. The residual amounts in the balancing account  
16 may result in an increase or a decrease in the amounts to be collected through the  
17 adjustment schedule. The combined forecast amounts plus residual balance amount  
18 will be the total amount to be collected through Schedule 190 rates for the year.

19 **Q. When does the Company seek to implement the WPP AAC?**

20 A. The Company has requested an effective date of August 24, 2022, and has proposed  
21 that the AAC cover all WPP-related expense beginning in 2022. These costs are  
22 currently being tracked in the Company's WPP deferral, docket UM 2221.

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<sup>14</sup> Application of PacifiCorp for Approval of the Wildfire Protection Plan Cost Recovery Adjustment, Advice No. 22-009/Docket No. UE 407 (May 5, 2022).

1 **Q. In this case, does the Company continue to propose that incremental WPP**  
2 **implementation costs be collected through an AAC, not through the WMVM,**  
3 **beginning in 2022?**

4 A. Yes, this ensures compliance with SB 762.

5 **Q. What is your understanding of how SB 762 has changed the scope of the**  
6 **WMVM?**

7 A. The Commission adopted the WMVM before passage of SB 762. That law  
8 specifically addresses cost recovery for WPP implementation through an AAC or  
9 other method to allow timely recovery. In PGE's most recent rate case, docket UE  
10 394, the Commission addressed but did not resolve exactly what type of cost recovery  
11 mechanism would comply with SB 762. But the Commission rejected Staff's  
12 proposal for a mechanism based on the WMVM as unsupported.<sup>15</sup>

13 **Q. What expenses should be covered by the WMVM after the passage of SB 762**  
14 **and the filing of PacifiCorp's WPP?**

15 A. With the filing of PacifiCorp's WPP and proposed AAC, the WMVM should now  
16 cover only incremental vegetation management expense unrelated to WPP  
17 implementation.

18 **Q. Does Staff agree that the plain language of Section 8 of SB 762 allows PacifiCorp**  
19 **to file for an AAC to recover costs for implementing a Commission-approved**  
20 **WPP?**

21 A. Yes.<sup>16</sup>

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<sup>15</sup> *In the Matter of Portland General Electric Company Request for a General Rate Revision*, Docket No. UE 394, Order No. 22-129 at 24 (Apr. 25, 2022).

<sup>16</sup> Staff/1700, Storm/59-60.

1 **Q. Does Staff agree that WPP costs should be removed from the operation of the**  
2 **WMVM and covered instead by the Company's AAC?**

3 A. Not yet. Staff recommends that until the Company has an approved AAC, all wildfire  
4 mitigation and vegetation management expense be recovered through the WMVM.<sup>17</sup>  
5 After reviewing PacifiCorp's proposed AAC mechanism, however, Staff indicates  
6 that it may recommend removing some of the vegetation management cost from the  
7 "rate case" cost recovery mechanism and moving it to the AAC, along with wildfire  
8 related costs.<sup>18</sup> Now that PacifiCorp has applied for an AAC, the Company hopes  
9 that Staff will agree that all WPP costs should be recovered through Schedule 190,  
10 instead of through the WMVM.

11 **Q. Does Staff propose a disallowance of the Company's prudent wildfire mitigation**  
12 **and vegetation management costs on the basis that Oregon's costs have grown**  
13 **relative to system costs?**

14 A. Yes. As Mr. Berreth explains, the Company's budget-based approach to forecasting  
15 costs for Oregon ensures that Oregon pays the costs of wildfire mitigation and  
16 vegetation management projects within the state. This is a more accurate and fair  
17 approach than Staff's disallowance based on relatively meaningless historical  
18 expenditure levels.

19 **Q. Does Staff also recommend a 10 percent holdback of the Company's wildfire**  
20 **mitigation and vegetation management test year expenditures?**

21 A. Yes. After reducing the Company's Oregon-allocated expense level to \$64.2 million,  
22 Staff recommends a baseline of \$57.8 million, which represents 90 percent of the test

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<sup>17</sup> Staff/1700, Storm/61-62.

<sup>18</sup> Staff/1700, Storm/62.



1 year expenses. The remaining 10 percent (or \$6.4 million) would be held back and  
2 subject to the WMVM's earnings test.

3 **Q. First, is it appropriate to include WPP-related costs in a WMVM "holdback"?**

4 A. No. Under SB 762, the Company is entitled to full and timely recovery of prudent  
5 WPP-related wildfire mitigation and vegetation management expense in base rates or  
6 under an AAC or other mechanism. As interpreted by Staff, the current construct of  
7 the WMVM does not satisfy this standard because it subjects a portion of  
8 PacifiCorp's prudent WPP-related costs in base rates to a full or partial disallowance.  
9 Irrespective of the outcome of PacifiCorp's pending AAC filing, the Commission can  
10 ensure compliance with SB 762 in this case by adopting PacifiCorp's proposal to  
11 exclude incremental WPP-related costs from the WMVM and rejecting Staff's  
12 proposal for a base rate holdback.

13 **Q. Please explain why Staff's base rate holdback misapplies Order No. 20-473 from**  
14 **the Company's last rate case.**

15 A. Staff relies on Order No. 20-473 in docket UE 374 to justify its proposed \$6.4 million  
16 hold-back. In that case, however, PacifiCorp updated its proposed wildfire and  
17 vegetation management expenses in its reply testimony, increasing its base rate  
18 request from \$24.4 million to \$33.2 million.<sup>19</sup> Staff responded by agreeing to support  
19 \$26.6 million in base rates, but urged the Commission to treat the \$6.6 million  
20 balance of the update as an incremental expense subject to the WMVM.<sup>20</sup> The  
21 Commission ultimately allowed \$30 million in base rates, and treated the balance of

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<sup>19</sup> *In the Matter of PacifiCorp dba Pacific Power Request for a General Rate Revision*, Docket No. UE 374, Order No. 20-473, n.577 (Dec. 18, 2020).

<sup>20</sup> *Id.* at 116.

1 PacifiCorp’s reply update costs (\$3.2 million) as incremental costs subject to the  
2 WMVM.<sup>21</sup>

3 Here, unlike in docket UE 374, Staff is not arguing that some portion of a  
4 reply update increase should be disallowed and instead be recoverable only as an  
5 incremental expense under the WMVM. Instead, Staff is proposing that a portion of  
6 PacifiCorp’s original base rate increase (the prudence of which Staff has not  
7 contested) be subject to the WMVM. This is an unreasonable extension of Order No.  
8 20-473, especially in light of the intervening passage of SB 762.

9 **Q. In rejecting Staff’s proposal for wildfire mitigation and vegetation management**  
10 **mechanism for PGE, did the Commission note that the PacifiCorp holdback**  
11 **related to an updated forecast, not the original forecast?**

12 A. Yes. With respect to the holdback, the Commission noted that in docket UE 374, it  
13 “applied a ten percent holdback to an increased level of test year spending *that the*  
14 *company had adjusted midway through the case.*”<sup>22</sup> In the PGE case, as here, Staff  
15 proposed to apply the holdback to the original test year forecast, a proposal the  
16 Commission rejected as unsupported.

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<sup>21</sup> *Id.* at 121-122.

<sup>22</sup> Order No. 22-129 at 25 (emphasis added).

1 **Q. Instead of a holdback, did the Commission require PGE to report on its actual**  
2 **wildfire mitigation and vegetation management expenditures and establish a**  
3 **deferral for unspent dollars?**

4 A. Yes.<sup>23</sup>

5 **Q. Does PacifiCorp agree to the same reporting and deferral treatment for its**  
6 **wildfire mitigation and vegetation management expenses?**

7 A. Yes.

8 **Q. The Company has proposed several changes to the WMVM, including increasing**  
9 **the violation levels tied to sharing thresholds for costs incurred incremental to**  
10 **those in base rates. Why is this reasonable?**

11 A. As explained by Mr. Berreth, higher targets (similar to those Staff proposed for PGE)  
12 are necessary to allow PacifiCorp a reasonable opportunity to meet these targets as  
13 the Company transitions to a three-year trimming cycle from 2022–2024.

14 **Q. PacifiCorp also proposed a sharing mechanism to replace the earnings test in the**  
15 **WMVM. Did Staff respond to this proposal?**

16 A. No, other than Staff’s general recommendation that the Commission reject all  
17 changes the Company proposed to the WMVM.<sup>24</sup>

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<sup>23</sup> *Id.* at 26. (“We direct PGE to establish a deferral to track any underspending from its planned budgets for these programs. We also direct PGE to submit a filing annually that includes a narrative description of its activities and spending by program. In this filing, PGE shall address with specificity its spending relative to the budgeted amounts for the test year, any planned changes in the budget for the following year, and an explanation for why any anticipated costs did not materialize as expected. We direct Staff to review this filing and present a memorandum summarizing any recommendations. To the extent that PGE is not expending the planned resources on these important programs, any underspend relative to test year budget will be evaluated to determine whether such funds should be returned to ratepayers. PGE should work with Staff to determine the appropriate timing for this annual filing and anticipate revisiting the timing and content of this filing, as well as the length of time this deferral and filing requirement should persist before being reevaluated, in the context of establishing any future recovery mechanism for wildfire mitigation plan costs.”)

<sup>24</sup> Staff/1700, Storm/73.

1 **Q. Does the Company continue to believe that the WMVM should include a sharing**  
2 **mechanism for incremental costs tied to specified violation levels, instead of an**  
3 **earnings test?**

4 A. Yes. A virtue of a sharing mechanism is that it creates a clear and easily applied  
5 incentive. Using an earnings test in the WMVM means that the Company's recovery  
6 under the mechanism can be tied to many factors unrelated to the Company's  
7 performance on wildfire mitigation and vegetation management. This blunts the  
8 performance incentive in the WMVM. The operation of the WMVM in 2021  
9 illustrates this point. The Company's earnings in 2021 were so low as to make the  
10 violation thresholds under the WMVM irrelevant to the Company's recovery.

11 In addition, earnings thresholds under the Company's authorized ROE work to  
12 effectively cap the Company's ROE below authorized levels and deprive the  
13 Company of a reasonable opportunity to earn its ROE.

14 **D. Renewable Adjustment Clause Deferrals**

15 **Q. Does Staff challenge the deferrals for Cedar Springs II and TB Flats?**

16 A. Not on the merits. Staff does propose certain adjustments to the calculation of the  
17 Cedar Springs II deferral balance, to which Ms. Cheung responds.

18 **Q. AWEC opposes the Cedar Springs II wind project deferral because “the minor**  
19 **amount of regulatory lag with respect to Cedar Springs II in December 2020 is**  
20 **not a valid reason to defer those costs.”<sup>25</sup> Is AWEC's objection reasonable?**

21 A. No. The deferrals are based on the Renewable Adjustment Clause mechanism  
22 (RAC), to which AWEC's predecessor the Industrial Customers of Northwest Utilities

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<sup>25</sup> AWEC/100, Mullins/22.

1 stipulated in docket UM 1330. In that stipulation, approved by the Commission in  
2 Order No. 07-572, the parties agreed to “support the use of deferred accounting to  
3 allow for recovery of prudently incurred costs of an eligible resource for the period  
4 between when the resource is placed in service and when the resource enters rates.”<sup>26</sup>  
5 The agreement to support deferred accounting was not subject to a minimum cost  
6 level, as AWEC now appears to claim. As Ms. Cheung also notes in her testimony,  
7 the Commission determined that Cedar Springs II was prudent in docket UE 374 and  
8 the benefits of this project are currently reflected in the TAM. The deferral is thus  
9 necessary to match costs and benefits in rates, a concept also embedded in the UM  
10 1330 stipulation.<sup>27</sup>

11 **Q. AWEC also opposes deferring the costs for TB Flats wind project because**  
12 **customers should be held harmless in connection with the severe delay in the in-**  
13 **service date for TB Flats.<sup>28</sup> Is this argument against PacifiCorp’s proposed cost**  
14 **deferrals reasonable?**

15 A. No, for the same reasons. The Commission determined that TB Flats was prudent in  
16 docket UE 374. AWEC does not challenge the prudence of TB Flats, just the use of a  
17 RAC deferral. There is no provision in the RAC preventing the Company from filing  
18 a deferral when a project is delayed, especially when, as here, the evidence is clear  
19 that the delay was a result of forces outside of the Company’s control.<sup>29</sup>

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<sup>26</sup> *In the Matter of Public Utility Commission of Oregon Investigation of Automatic Adjustment Clause Pursuant to SB 838*, Docket No. UM 1330, Order No. 07-572 (Dec. 19, 2007).

<sup>27</sup> *Id.* at Appendix A, Section 6(j).

<sup>28</sup> AWEC/100, Mullins/22.

<sup>29</sup> See PAC/500, Hemstreet/4-6.

1 **Q. Finally, AWEC recommends against deferring costs for the TB Flats wind**  
2 **project because PacifiCorp had the opportunity to file a rate case in 2021 to**  
3 **incorporate the costs of the TB Flats wind project but did not do so. How does**  
4 **the Company respond?**

5 A. AWEC also ignores the provisions of the RAC stipulation on how and when a utility  
6 must file a rate case to include costs covered by the RAC in base rates. Suffice it to  
7 say, there is no requirement for PacifiCorp to file a rate case if at all possible to avoid  
8 a RAC filing or a RAC deferral. Ms. Cheung also points out the practical flaws  
9 associated with AWEC's argument

10 **Q. AWEC ultimately recommends removing the wind project deferrals, which**  
11 **would produce a \$6,348,530 reduction to revenue requirement. Does the**  
12 **Company find this recommendation to be reasonable?**

13 A. No, for the reasons stated above and in Ms. Cheung's testimony.

14 **E. Depreciation/Exit Orders**

15 **Q. Does Staff support PacifiCorp's recommendations regarding coal unit**  
16 **depreciation end dates and Exit Orders in this docket?**

17 A. Yes.

18 **Q. Has Staff raised a concern about the conversion of Jim Bridger Unit 1 to natural**  
19 **gas?**

20 A. Yes. Staff is concerned that if Jim Bridger Unit 1 is not converted to gas by  
21 December 31, 2023, coal-fueled operations at Jim Bridger Unit 1 could continue  
22 beyond the Exit Date for that unit—requiring Oregon to exit the unit on that date.<sup>30</sup>

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<sup>30</sup> Staff/300, Anderson/7.

1 Staff recommends that the Commission direct PacifiCorp to file a notification with  
2 the Commission as soon as the Company becomes aware that coal-fueled operations  
3 at Jim Bridger Unit 1 are expected to continue past December 31, 2023—but at any  
4 rate, no later than September 31, 2023 to provide the Commission adequate time to  
5 respond.<sup>31</sup>

6 **Q. Please respond to Staff’s issue regarding the exit order for Jim Bridger Unit 1.**

7 A. If necessary, the Company agrees to file the notice recommended by Staff, and  
8 request a change to the Exit Order for Jim Bridger Unit 1 that resolves the issue  
9 identified by Staff. As Staff suggests, the Exit Date for Jim Bridger Unit 1 could then  
10 be extended until after the expected, delayed in-service date of the gas-converted  
11 unit.<sup>32</sup>

12 **Q. Is it also the Company’s understanding that AWEC supports PacifiCorp’s**  
13 **proposed changes to the updating of depreciable lives for Craig 2, Hayden 1 and**  
14 **2?**

15 A. Yes.

16 **Q. AWEC recommends that the depreciable life of Colstrip Units 3 and 4 be**  
17 **maintained at 2027 as this reduces system depreciation expense by \$12 million**  
18 **and does not preclude retirement in 2025.<sup>33</sup> Is AWEC’s recommendation**  
19 **reasonable?**

20 A. No. To avoid potential increased rate pressure in the future or stranded investment,  
21 the depreciable life of Colstrip should match its most likely retirement date. While

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<sup>31</sup> Staff/300, Anderson/8.

<sup>32</sup> Staff/300, Anderson/8.

<sup>33</sup> AWEC/200, Kaufman/12.

1 maintaining a 2027 depreciable life would not technically foreclose Colstrip Units 3  
2 and 4's retirement in 2025, it could leave the Company and customers with significant  
3 undepreciated investment or an even more truncated recovery timeline. The  
4 Company's proposal to move to a 2025 depreciable life for Colstrip Units 3 and 4 is  
5 designed to avoid this outcome, now that the Company's 2021 Integrated Resource  
6 Plan has selected a 2025 retirement date for Colstrip Units 3 and 4.

7 **Q. AWEC also recommends extending the depreciable life of Jim Bridger Units 1**  
8 **and 2 to 2038 to reflect conversion to gas, thereby reducing system depreciation**  
9 **expenses by \$31 million and \$16 million respectively.<sup>34</sup> How does the Company**  
10 **respond?**

11 A. While the Company finds this suggestion to be a constructive approach to potentially  
12 mitigate near-term rate pressures, it may be premature to implement an extension of  
13 depreciation expenses to the expected operating life of the converted units, 2037, until  
14 the Commission has determined that conversion is prudent for Oregon customers. As  
15 such, the Company has not incorporated this proposal in its reply case, however, will  
16 engage further with parties in settlement to see if a mutually acceptable approach is  
17 feasible.

18 **F. Changes to the TAM and PCAM**

19 **Q. Does the Company continue to advocate for refinements in the TAM and PCAM**  
20 **to allow the Company a reasonable opportunity to recover its NPC?**

21 A. Yes. As outlined in Mr. Michael G. Wilding's reply testimony, the proposed changes  
22 to the TAM will result in a more accurate NPC, are consistent with good policy, and

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<sup>34</sup> AWEC/200, Kaufman/12-14.



1 will not lead to increased administrative burdens on the parties. The Company agrees  
2 with Staff's recommendations regarding the rate year update and the inclusion of  
3 hydrological forecasts in the TAM proceeding.

4 Additionally, the proposed changes to the PCAM are necessary and  
5 appropriate. PacifiCorp has provided evidence on how the fundamental risk balance  
6 has shifted as a result of larger changes in the resource mix at PacifiCorp and across  
7 the west. This has introduced a systemic bias into the PCAM so that it is not a  
8 revenue neutral mechanism for the Company. To remedy this issue, PacifiCorp has  
9 proposed modest changes as a step towards addressing this issue.

10 **Q. Does this conclude your reply testimony?**

11 A. Yes.

Docket No. UE 399  
Exhibit PAC/1300  
Witness: Nikki L. Koblaha

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Nikki L. Koblaha

July 2022

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**ATTACHED EXHIBITS**

Confidential Exhibit PAC/1301—Proforma Cost of Long-Term Debt

Exhibit PAC/1302—NOL Example

1 **Q. Are you the same Nikki L. Kobliha who previously submitted direct testimony in**  
2 **this proceeding on behalf of PacifiCorp d/b/a Pacific Power (PacifiCorp or the**  
3 **Company)?**

4 A. Yes, I am.

5 **I. SUMMARY AND PURPOSE OF TESTIMONY**

6 **Q. What is the purpose of your reply testimony?**

7 A. I will respond to certain issues raised in the opening testimony filed by Matt Muldoon  
8 for the Public Utility Commission of Oregon (Commission) Staff (Staff), by Michael  
9 P. Gorman for the Alliance of Western Energy Consumers (AWEC) and the Oregon  
10 Citizens' Utility Board (CUB), Lloyd C. Reed for the Klamath Water Users  
11 Association and the Oregon Farm Bureau Federation (KWUA-OFBF), Bradley G.  
12 Mullins for AWEC, Steve Storm for Staff, and Ming Peng for Staff.

13 **Q. Please explain how your testimony is organized and the issues you will address in**  
14 **your reply testimony.**

15 A. I will comment on the following issues and recommendations.

- 16 1. In Section II, I respond to the recommendations by Mr. Muldoon, Mr. Gorman  
17 and Mr. Reed, on the Company's proposed capital structure and explain why  
18 the Company's proposed capital structure is reasonable and necessary.
- 19 2. In Section III, I address Ms. Peng's recommendation for an updated cost of debt  
20 and discuss why my updated recommendation is reasonable.
- 21 3. In Section IV, I respond to Mr. Mullins' testimony on the Tax Benefit of  
22 Holding Company Interest explaining how his testimony mischaracterizes the  
23 nature of affiliate debt, particularly related to the protections established

1 through ring-fencing, during the 2006 acquisition of PacifiCorp make his  
2 proposed adjustment inappropriate. In addition, I explain how his adjustment  
3 for State Net Operating Losses Carryforwards is in error by demonstrating how  
4 customers benefit through lower income tax expense.

- 5 4. In Section V, I explain why Mr. Storm's recommendation to increase the  
6 Company's expected return on assets for the Company's pension and other  
7 post-retirement employee benefits (OPEB) plan should be rejected. I also offer  
8 an update for the discount rate on both plans based on recent market conditions  
9 and consultation with the Company's actuaries rather than a blanket 50 basis  
10 point increase.

## 11 II. CAPITAL STRUCTURE

12 **Q. Please comment on the recommendation from Staff for a 50 percent equity level.**

13 A. Staff has recommended a 50 percent equity level based on consistency with recent  
14 orders for all Oregon utilities and the fact that Berkshire Hathaway Inc. (BHI) has  
15 significant cash reserves which insulate it, and presumably PacifiCorp, from concerns  
16 about inflation and credit worthiness. Staff's recommendation does not account for  
17 any differences between the utilities, in particular the significant forecasted capital  
18 spending the Company presented in this case,<sup>1</sup> which is an important consideration  
19 driving the need for the Company to frequently access the debt capital markets. In  
20 addition, the recommendation does not acknowledge the ring-fencing provisions  
21 agreed upon during the acquisition of PacifiCorp by Berkshire Hathaway Energy  
22 Company (BHE) (formerly MidAmerican Energy Holding Company), which isolates

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<sup>1</sup> PAC/200, Kobliha/9.

1 customers from the operations of any parent company. Staff wrongly surmises that  
2 PacifiCorp has easy access to the consolidated cash position of BHI and that the  
3 Company's only driver for requesting the thicker equity is to maximize BHI return  
4 for shareholders.

5 The Company's request for thicker equity is based on a real concern around  
6 increased costs for customers if the Company were to be downgraded by Moody's or  
7 Standard & Poor's (S&P). The incremental 12 basis point higher cost of capital, or  
8 an estimated \$5.0 million in revenue requirement, as noted in my direct testimony,<sup>2</sup> is  
9 reasonable considering the 46 basis points savings the Company realized from being  
10 single A rated since its acquisition by BHE.

11 **Q. Mr. Muldoon suggests your direct testimony indicates PacifiCorp is facing**  
12 **“more difficult financing challenges than the other Commission jurisdictional**  
13 **energy utilities.”<sup>3</sup> Do you agree with that characterization of your direct**  
14 **testimony?**

15 A. No. In my direct testimony I provide reference to PacifiCorp's 2021 Rate Case order  
16 where the Commission points to other utilities having a 50/50 capital structure as  
17 being a key reason for PacifiCorp's capital structure being set at that same level.<sup>4</sup> My  
18 position is that there are a number of factors that support why a one size fits all  
19 capital structure is not appropriate. I specifically call out the lower credit metrics of  
20 Portland General Electric Company (PGE) being easier to achieve than PacifiCorp's  
21 metrics in addition to other factors surrounding PacifiCorp's need to access the

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<sup>2</sup> PAC/200, Kobliha/12.

<sup>3</sup> Staff/100, Muldoon/5-6.

<sup>4</sup> PAC/200, Kobliha/8.

1 capital markets on a regular basis due to the Company’s need for significant capital  
2 expenditures. Accessing the debt capital markets on a least cost basis and the ability  
3 to access the debt capital markets in times of tight liquidity is always top-of-mind for  
4 the Company and the thicker capital structure will support strong credit metrics and  
5 PacifiCorp’s current credit ratings, particularly while it spends a significant amount of  
6 capital expenditures needed to transform its resource portfolio, including the need to  
7 meet the energy policy goals of the state of Oregon.

8 **Q. Mr. Muldoon’s testimony asks whether the Company is “actually facing dire**  
9 **economic conditions in which they are unlikely to meet financial obligations and**  
10 **face credit ratings downgrades based on usual and customary Commission**  
11 **decisions.”<sup>5</sup> Can you respond to this?**

12 A. Mr. Muldoon’s hyperbole is misplaced. The Company is not facing dire economic  
13 conditions or unable to meet its financial obligations and my direct testimony did not  
14 imply as much.

15 What my direct testimony does is present evidence that a less than  
16 52.25 percent equity component of the capital structure increases leverage and puts  
17 the Company at risk of missing its Moody’s-outlined credit metrics, which could  
18 potentially result in a downgrade. A downgrade of the Company’s credit ratings will  
19 result in higher interest rates on subsequently issued first mortgage bonds, require  
20 increased posting of cash collateral on wholesale energy contracts, and higher interest  
21 costs on short-term credit facility borrowings (approximate 12.5 basis point increase)  
22 all of which increase costs to customers.

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<sup>5</sup> Staff/100, Muldoon/14.

1 My direct testimony also refers to a quote from Moody's indicating that  
2 commission decisions do play an important part in a company's credit ratings.<sup>6</sup> Less  
3 supportive commission decisions have influenced rating agency decisions to  
4 downgrade other companies' credit ratings.

5 **Q. Mr. Muldoon makes reference to cash held by BHI at December 31, 2021, as**  
6 **proof that PacifiCorp is insulated from concerns potentially realized by other**  
7 **investor-owned utilities.<sup>7</sup> Please comment about the cash held at BHI and its**  
8 **relevance to this proceeding.**

9 A. The financial health and consolidated cash position at BHI is in no way relevant to  
10 this proceeding. As previously noted, when Warren Buffett and BHI through BHE  
11 acquired PacifiCorp in 2006, all parties agreed to provisions that would ring-fence the  
12 operations of the utility from that of its parent company. These provisions protect  
13 PacifiCorp and its customers in the event that PacifiCorp's indirect parent BHE,  
14 ultimate parent BHI or any of their subsidiaries finds themselves in bankruptcy,  
15 isolating PacifiCorp and its customers from any impacts. PacifiCorp operates  
16 independent of BHI and funds its own operations through its ongoing cash from  
17 operations, holding its own debt through periodically accessing the debt capital  
18 markets, and paying dividends when necessary to balance its capital structure. This  
19 independent operation is consistent with merger commitments prohibiting cross-  
20 subsidization (GC 9), requiring PacifiCorp to maintain separate debt (GC 15) and  
21 preventing PacifiCorp from pledging any assets to support the securities of BHI,  
22 BHE, or any of their subsidiaries (GC 20). These merger commitments mean not

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<sup>6</sup> *Id.*

<sup>7</sup> Staff/100, Muldoon/20.



1 only that the Company and its customers are isolated from negative consequences of  
2 a bankruptcy, but it also means PacifiCorp does not have ready access to the cash  
3 Mr. Buffett referred to as having on hand, particularly because a large portion of the  
4 cash is held at its insurance and other companies for use in their operations.

5 Furthermore, if PacifiCorp were to need additional liquidity from BHE or BHI, it  
6 would be in the form of an equity contribution that would increase its equity.

7 PacifiCorp has not received an equity contribution from BHE or BHI since 2010 and  
8 does not anticipate receiving one in the near future.

9 **Q. Mr. Muldoon testified that the “[a]ctual capital structure for PacifiCorp is at the  
10 Company...discretion.”<sup>8</sup> Do you agree with that statement?**

11 A. Not entirely. While the Company is making decisions regarding its actual capital  
12 structure, those decisions are largely influenced by the capital structure approved  
13 across the six jurisdictions in which the Company operates. This gives the  
14 Commission indirect control from the perspective that the Company targets its five-  
15 quarter average common equity to equal the weighted average common equity level  
16 authorized across those six jurisdictions. This enables the Company to earn its  
17 authorized return.

18 **Q. Mr. Gorman argues that a capital structure with only 50.95 percent equity and  
19 his overall rate of return is clearly adequate given the Company’s current rating  
20 by S&P. Is Mr. Gorman’s reliance on S&P reasonable for ratemaking  
21 purposes?**

22 A. No. PacifiCorp is not individually rated by S&P but rather part of a group rating

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<sup>8</sup> Staff/100, Muldoon/19.

1 methodology performed at the BHE level. As a result, the conclusion that  
2 PacifiCorp's equity ratio in 2019 and 2020 presented by Mr. Gorman was adequate to  
3 support the Company's bond rating is not accurate. Under the group methodology,  
4 the rating of the Company is impacted by the entire family of BHE companies. Also,  
5 to assess whether ratings will be maintained based on the performance of just  
6 PacifiCorp, let alone just the Oregon jurisdiction within PacifiCorp as Mr. Gorman  
7 has alleged, is not possible. This is one of the reasons PacifiCorp looks more towards  
8 achieving the Moody's credit metrics when assessing its capital structure, and in  
9 particular the Moody's Cash from Operations pre-Working Capital targets.

10 Furthermore, while Mr. Gorman's proposal in excess of the currently  
11 authorized 50/50 is helpful, it does not fully consider the significant and sustained  
12 capital spending I reference in my direct testimony that is needed to meet the energy  
13 policy and wildfire mitigation objectives of the state of Oregon and as a result of  
14 PacifiCorp's 2021 Integrated Resource Plan (IRP).

15 **Q. Mr. Reed suggests the Company's modification to its capital structure is simply**  
16 **a maneuver to "increase its profit margin."<sup>9</sup> Do you agree with that**  
17 **characterization?**

18 A. I disagree with Mr. Reed's suggestion that the Company is increasing its capital  
19 structure to simply increase its profit margin, and in fact the Company has recently  
20 needed to maintain a capital structure thicker than its weighted average authorized  
21 level, further compromising the Company's ability to earn its authorized return. As  
22 described in my direct testimony, the Company has an obligation to serve its

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<sup>9</sup> KWUA-OFBF/100, Reed/11.

1 customers with safe, reliable electricity. The capital structure proposed in this case  
2 will enable the Company to do so on a least-cost, least-risk basis through continued  
3 access to the capital debt market during a time when the Company is transforming its  
4 portfolio mix to meet the energy policy and wildfire mitigation objectives of the state  
5 of Oregon and as a result of PacifiCorp's 2021 IRP.

### 6 III. COST OF DEBT

7 **Q. Did you consider the adjustments made to your initial filing by Staff in arriving**  
8 **at their recommended Cost of Long-Term Debt of 4.588 percent?**

9 A. Yes. I agree that it is appropriate to update the pro-forma long-term debt and  
10 Pollution Control Revenue Bond rates included in my direct testimony based on more  
11 recent forward market rates. However, I do not agree with the tenor used by  
12 Ms. Peng when selecting the rate to apply on the Company's pro-forma long-term  
13 debt issuance. The Company typically issues bonds with a 30-year maturity to match  
14 the long-lived nature of the Company's assets. Use of 10-year maturities occurs on  
15 occasion, depending on market conditions and liquidity requirements when multi-  
16 tranche financing can provide for a larger pool of investors, to fill in gaps in maturity  
17 towers and for times when 10-year term bonds provide significantly lower rates than  
18 longer term bonds. The Company has never issued the less conventional 20-year  
19 term first mortgage bond and given the nearly identical current indicative issuance  
20 prices for 20-year and a 30-year maturity bonds, it makes more sense to select the  
21 longer term and lock in a near equivalent and still relatively low rate for the added  
22 10 years of duration. While a 20-year issuance is possible, the Company's current  
23 plans do not anticipate the use of that term in the near future and hence believe any

1 revised cost of debt calculation should continue to reflect a mix of 10- and 30-year  
2 tenors.

3 **Q. What is your recommendation regarding the Company’s cost of long-term debt?**

4 A. I recommend an updated cost of debt of 4.717 percent rather than the Staff  
5 recommended 4.588 percent. This updated rate uses a current treasury rate and  
6 indicative spread as provided by PacifiCorp’s relationship bank on June 23, 2022, for  
7 the Company’s planned 2022 issuance, updated forward treasury rates from June 29,  
8 2022, for the Company’s planned 2023 issuances, and updated forward one month  
9 borrowing rates as the basis for adjusting the test period variable-rates for the  
10 Company’s Pollution Control Revenue Bond portfolio. This updated pricing reflects  
11 the current market closer to the Company’s planned 2022 issuance and other test  
12 period borrowing activity. Please refer to Confidential Exhibit PAC/1301 Proforma  
13 Cost of Long-Term Debt for calculations.

14 **Q. What overall cost of capital are you now recommending for PacifiCorp?**

15 A. I am recommending an overall cost of capital of 7.37 percent. This cost includes the  
16 return on equity recommendation of 9.8 percent, supported by the reply testimony of  
17 Company witness Ann E. Bulkley, and the capital structure and costs as shown in  
18 Table 1.

19 **Table 1: Overall Cost of Capital**  
20

Component	\$m	% of Total	Cost %	Weighted Ave Cost %
Long-Term Debt	\$ 9,989	47.74%	4.72%	2.25%
Preferred Stock	2	0.01%	6.75%	0.00%
Common Stock Equity	10,933	52.25%	9.80%	5.12%
	<u>\$ 20,924</u>	<u>100.00%</u>		<u>7.37%</u>

1                   **IV.    AWEC ADJUSTMENTS TO INCOME TAXES**

2   **Q.    What is the purpose of this section of your testimony?**

3   A.    In this section of my testimony, I address AWEC witness Mr. Mullins’ proposed  
4           adjustments to income taxes for the tax benefit of holding company interest and state  
5           net operating loss carryforwards. Mr. Mullins’ proposed adjustment to income taxes  
6           for the injuries and damages deferred tax asset is addressed in the reply testimony of  
7           Company witness Sherona L. Cheung.

8           **A.    Tax Benefit of Holding Company Interest**

9   **Q.    Do the amounts included for income taxes in this proceeding meet the**  
10 **requirements of Oregon Revised Statute (ORS) 757.269?**

11 A.    Yes. In testimony, Staff has acknowledged ORS 757.269 and reports: “Overall, Staff  
12           concludes that the Company’s provision for tax appears to be correctly calculated for  
13           ratemaking purposes.”<sup>10</sup>

14 **Q.    Can you explain the nature of the specific adjustment Mr. Mullins is proposing**  
15 **and its relevance to this case?**

16 A.    Mr. Mullins has taken the position that BHE has borrowed money at the holding  
17           company level in an effort to receive incremental tax benefits beyond what is being  
18           passed on to customers through rates. While such a tax benefit might be realized by  
19           BHE through their activity in the debt capital markets, neither the interest expense nor  
20           the potential tax deduction of BHE’s borrowing activities are in any way connected to  
21           or dependent on PacifiCorp’s operations due to the ring-fenced and independent  
22           operation of PacifiCorp. This ring-fenced and independent operation was the

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<sup>10</sup> Staff/200, Fox/40, Lines 6-7.

1 structure that was agreed to through various merger commitments made at the time  
2 PacifiCorp was acquired and the agreed upon structure has been consistently applied  
3 ever since.

4 **Q. On what basis does AWEC argue the Commission should adjust PacifiCorp's**  
5 **estimated income tax in this proceeding?**

6 A. Citing subsection (3) of ORS 757.269, Mr. Mullins testifies that the corporate  
7 structure under which PacifiCorp is held results in the affiliated group paying federal  
8 and state income taxes that are less than the amounts that would be paid if PacifiCorp  
9 were an Oregon-only regulated utility<sup>11</sup> and proposes an adjustment accordingly.  
10 However, Mr. Mullins has not presented any evidence that PacifiCorp's affiliated  
11 group,<sup>12</sup> Berkshire Hathaway Inc. and Subsidiaries, has ever paid less income taxes  
12 than the income taxes PacifiCorp would pay if PacifiCorp were an Oregon-only  
13 regulated utility operation, let alone that Berkshire Hathaway Inc. and Subsidiaries  
14 has a "history" of doing so pursuant to ORS 757.269(3)(a). In fact, Mr. Mullins has  
15 not demonstrated how the BHE interest expense for which he imputes a tax benefit to  
16 PacifiCorp would change the tax liability of Berkshire Hathaway Inc. and  
17 Subsidiaries in any way if the same amount was instead incurred by PacifiCorp; it  
18 would not.

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<sup>11</sup> AWEC/100, Mullins/5, Lines 16-18.

<sup>12</sup> Pursuant to ORS 757.269(5), "affiliated group" means a group of corporations of which the public utility is a member and that files a consolidated federal income tax return.

1 **Q. Is AWEC's characterization of debt issuances by BHE consistent with the**  
2 **merger commitments adopted by the Commission when it approved the**  
3 **acquisition of PacifiCorp by BHE (formerly MidAmerican Energy Holdings**  
4 **Company (MEHC))?**

5 A. No. AWEC states that rather than PacifiCorp issuing its own debt, debt is instead  
6 issued by BHE and that BHE is borrowing against future PacifiCorp dividends.<sup>13</sup>

7 As part of its approval of the acquisition, the Commission adopted robust  
8 ring-fencing provisions designed to ensure the financial stability of PacifiCorp as a  
9 regulated utility.<sup>14</sup> As particularly relevant here:

- 10 • GC 11b established an organizational structure for PacifiCorp that, among  
11 other items, includes maintaining separate books and records, no commingling  
12 of assets, paying its own liabilities out of its own funds, not holding out its  
13 credit as being available to satisfy obligations of others, and maintaining  
14 adequate capital, all which ring-fence PacifiCorp such that it will not get  
15 pulled into a bankruptcy proceeding if BHE ever files for bankruptcy
- 16 • GC 9 agreed to not cross-subsidize between regulated and non-regulated  
17 businesses
- 18 • GC 15 agreed to maintain separate debt
- 19 • GC 20 committed that PacifiCorp will not assume any obligation or liability  
20 as a guarantor, endorser, surety or otherwise for MEHC, BHI or any of their

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<sup>13</sup> AWEC/100, Mullins/5, Lines 10-13

<sup>14</sup> *In the Matter of MidAmerican Energy Holdings Company Application for Authorization to Acquire Pacific Power & Light, dba PacifiCorp*, Docket No. UM 1209, Order No. 06-082 at 7 (Feb. 24, 2006).

1 subsidiaries and that neither MEHC nor BHI will pledge any of the assets of  
2 the business of PacifiCorp as backing for any securities.

3 In support of the ring-fencing provisions, Staff noted that the commitments  
4 mitigated the “potential harms of the transaction related to debt or leverage at MEHC  
5 [and] its effect on PacifiCorp’s credit ratings and the resulting increase in  
6 PacifiCorp’s cost of debt.”<sup>15</sup> CUB likewise supported the “stringent ring-fencing  
7 provisions that ensure PacifiCorp is adequately capitalized and separated from the  
8 parent’s other business activities.”<sup>16</sup> AWEC’s predecessor, the Industrial Customers  
9 of Northwest Utilities (ICNU), also supported the ring-fencing provisions and argued  
10 that they will “help to potentially mitigate the threats to PacifiCorp’s financial  
11 stability and reduce the possibility that MEHC may manipulate PacifiCorp’s common  
12 equity.”<sup>17</sup>

13 These merger commitments run contrary to AWEC’s characterizations of the  
14 borrowings made by BHE and PacifiCorp including that BHE is issuing debt rather  
15 than PacifiCorp and borrowing against future dividends.<sup>18</sup> Additionally, as it does  
16 today, BHE has held debt since the acquisition of PacifiCorp and there has been no  
17 demonstrable change in circumstances since that would warrant AWEC’s proposed  
18 adjustment.

19 **Q. Why are the ring-fencing provisions and independent operation so important?**

20 A. The ring-fencing provisions noted above were put in place to protect PacifiCorp  
21 customers from any consequences of a bankruptcy filing at BHE, BHI or their

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<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> AWEC/100, Mullins/5, Lines 10-13.



1 subsidiaries. These provisions ensure only the costs and benefits applicable to the  
2 operations of PacifiCorp are reflected in customer rates. PacifiCorp, BHE and BHI  
3 take the ring-fencing provisions seriously and do not enter into any transactions that  
4 could violate the merger commitments around ring-fencing and pierce the corporate  
5 veil putting customers at risk. The Commission has clearly recognized the  
6 importance of such provisions not only in the BHE and PacifiCorp acquisition but  
7 prior to that in the 1997 acquisition of PGE by Enron. Similar ring-fencing measures  
8 put in place by the Commission for PGE protected it from bankruptcy when Enron  
9 filed for Chapter 11 bankruptcy protection in 2001.

10 Including the tax benefits of the interest expense deduction for debt that is  
11 clearly held at BHE undermines those ring-fencing provisions because the adjustment  
12 indirectly assigns some portion of the parent company debt to PacifiCorp.

13 **Q. What is your recommendation regarding AWEC's proposed adjustment for the**  
14 **tax benefit of holding company interest?**

15 A. AWEC has mischaracterized BHE's debt issuances in a manner that clearly runs  
16 contrary to PacifiCorp's merger commitments and imputing tax benefits on interest  
17 incurred on BHE debt exposes customers to risk that ring-fencing is designed to  
18 mitigate; AWEC has failed to demonstrate how the BHE interest for which they  
19 impute a tax benefit to PacifiCorp would change the tax liability of PacifiCorp's  
20 affiliated group, Berkshire Hathaway Inc. and Subsidiaries, in any way if the same  
21 amount of interest expense was instead incurred by PacifiCorp; and AWEC has not  
22 presented any evidence to support its assertion that Berkshire Hathaway Inc. and  
23 Subsidiaries pays less income taxes than the income taxes PacifiCorp would pay if

1 PacifiCorp were an Oregon-only regulated utility operation. For these reasons, the  
2 Commission should reject AWEC's proposed adjustment.

3 **B. State Net Operating Loss Carryforwards**

4 **Q. What is AWEC's proposal for the State Net Operating Loss (NOL) Deferred  
5 Tax Assets (DTA)?**

6 A. AWEC proposes that PacifiCorp's State NOL DTA should be removed from rate base  
7 because the DTA does not represent a benefit to customers.<sup>19</sup> AWEC goes on to say  
8 that if the DTA is included in rate base, it would be appropriate for the benefit of the  
9 state NOL to be passed on to customers.<sup>20</sup>

10 **Q. Has the benefit of the state NOL been passed on to customers?**

11 A. Yes. Consistent with its longstanding ratemaking practices in Oregon, PacifiCorp  
12 uses a normalized method of accounting for income taxes. As a result, the tax  
13 benefits that produced the NOL have been accounted for in a manner that reduces  
14 income tax expense. In this way, customers have received the benefit of the state  
15 NOL. PacifiCorp, however, has yet to realize those benefits and has properly  
16 recorded a DTA and included the DTA in rate base. An illustrative example of the  
17 accounting mechanics is provided in Exhibit PAC/1302 NOL Example.

18 **Q. How do you respond to AWEC's assertion that other Oregon utilities have  
19 eliminated state income taxes from revenue requirement?**

20 A. To the best of my knowledge, the common ratemaking practice in Oregon is for

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<sup>19</sup> AWEC/100, Mullins/7, Lines 13-14. The State NOL DTA consists of two secondary accounts in FERC Account 190. Secondary account 287437 DTA NOL Carryforward-State (Total Company \$66,981,587; Oregon Allocated \$18,200,961), and secondary account 287449 DTA Federal Detriment of State NOL (Total Company -\$14,100,336; Oregon Allocated -\$3,831,496). AWEC's testimony incorrectly states the total company and Oregon allocated balances of secondary account 287437 and incorrectly excludes secondary account 287449.

<sup>20</sup> AWEC/100, Mullins, Lines 20-21.

1 federal and state income taxes to be included in rates using a normalized method of  
2 accounting. AWEC did not provide a citation for any of the filings that Mr. Mullins  
3 reviewed in support of his statement that “other utilities with large state carryforward  
4 balances, such as Avista, have eliminated state taxes from revenue requirement.”<sup>21</sup>  
5 Accordingly, PacifiCorp has not had an opportunity to review those filings<sup>22</sup> to  
6 understand if the facts and circumstances of those “other utilities” are similar to  
7 PacifiCorp’s.

8 **Q. What is your recommendation for AWEC’s proposed adjustment for state NOL**  
9 **carryforwards?**

10 A. As demonstrated in Exhibit PAC/1302, contrary to AWEC’s assertion otherwise,  
11 customers do receive the tax benefit of state NOLs. Accordingly, AWEC’s proposed  
12 adjustment is in error, in addition to being inconsistent with longstanding ratemaking  
13 practices for PacifiCorp in Oregon where state income taxes are included in revenue  
14 requirement. For these reasons AWEC’s proposed adjustment for state NOL  
15 carryforwards should be rejected by the Commission.

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<sup>21</sup> AWEC/100, Mullins/7, Lines 24-25.

<sup>22</sup> PacifiCorp sought clarification in discovery regarding the filings reviewed by Mr. Mullins that eliminated state income taxes from revenue requirement. Notwithstanding that Mr. Mullins indicated in testimony that other ‘utilities’ have eliminated state income taxes from revenue requirement, only Avista’s general rate case docket UG 433 was provided in a data request response. PacifiCorp has not had the chance to review this filing due to timing of receipt of the response and reserves the right to address further in sur-reply testimony.

1           **V.    PENSION AND POST-RETIREMENT MEDICAL BENEFITS**

2   **Q.    Mr. Storm challenges the Company’s expected return on plan assets and**  
3       **discount rate assumptions utilized for its defined benefit pension and post-**  
4       **retirement plans, indicating the Company has “considerable discretion” over**  
5       **these assumptions.<sup>23</sup> Mr. Storm also performed his own analyses of the expected**  
6       **return on assets and discount rate assumptions for the plans and recommends**  
7       **revised net periodic benefit cost for the plans. Do you agree with Mr. Storm’s**  
8       **view and recommended adjustments?**

9   **A.**    No, I do not. While there is some discretion in selecting the expected return on assets  
10       and discount rate assumptions for the Company’s defined benefit plans, the  
11       assumptions are determined in accordance with generally accepted accounting  
12       principles and are based on plan-specific details, including projected cash flow  
13       obligations of the plans, investment mix and investment strategy of plan assets, and  
14       the funded status of the plans.

15                I also disagree with Mr. Storm’s analyses and recommendations related to the  
16       expected return on assets assumption as discussed below. While I do not disagree  
17       with the discount rate being impacted by changes in the market, I do not agree with  
18       Mr. Storm’s calculation and recommend updates based on the latest projections  
19       performed by the Company’s actuaries as described below.

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<sup>23</sup> PacifiCorp sought clarification in discovery regarding the filings reviewed by Mr. Mullins where Oregon utilities eliminated state income taxes from revenue requirement. Mr. Mullins’ testimony at AWEC/100, Mullins 7, Lines 24-25, leads the Company to believe that more than one filing had been reviewed and that more than one utility was eliminating state income taxes from revenue requirement in Oregon. In response to PacifiCorp Data Request No. 2 to AWEC, Mr. Mullins identified only Avista’s general rate case, Docket No. UG 433. PacifiCorp has not had the chance to review Avista’s filing due to timing of receipt of the response and reserves the right to address further in surrebuttal testimony.

1 **Q. Why do you disagree with Mr. Storm's analysis and recommendations related to**  
2 **the expected return on plan assets and discount rate assumptions?**

3 A. Mr. Storm's analysis involved averaging discount rates and expected return on assets  
4 assumptions of multiple entities and using those along with the sensitivity analyses to  
5 compute a downward adjustment to the Company's net periodic benefit cost. Such an  
6 approach is flawed as it is both unreasonable to rely on assumptions from others'  
7 plans and is unacceptable under Accounting Standards Codification Topics 715-30,  
8 Defined Benefit Plans-Pension (ASC 715-30) and 715-60, Defined Benefit Plans-  
9 Other Postretirement (ASC 715-60).

10 **Q. Why is it unreasonable to consider assumptions from other entities' defined**  
11 **benefit plans in determining net periodic benefit cost for the Company's pension**  
12 **and OPEB plans?**

13 A. Each defined benefit plan differs in the types of benefits provided, participant  
14 population and demographics, plan experience, timing of benefit payments,  
15 investment mix and strategy, unrecognized actuarial gains and losses, prior service  
16 costs, etc. The determination of discount rate and expected return on plan asset  
17 assumptions are influenced by factors specific to a defined benefit plan and therefore  
18 are determined on a plan-specific basis.

19 **Q. Why is it unacceptable under ASC 715-30 and 715-60 to consider other entities'**  
20 **assumptions in determining the Company's net periodic benefit cost for its**  
21 **pension and OPEB plans?**

22 A. Both ASC 715-30 and ASC 715-60 require the use of explicit assumptions  
23 individually representing the best estimate of future activity associated with the plans'

1 specific obligations. For example, with respect to discount rates, ASC 715-30-35-44  
2 states in part “...The objective of selecting assumed discount rates using that method  
3 is to measure the single amount that, if invested at the measurement date in a portfolio  
4 of high-quality debt instruments, would provide the necessary future cash flows to  
5 pay the pension benefits when due...” ASC 715-60-35-79 similarly states “In making  
6 that assumption, employers shall look to rates of return on high-quality fixed-income  
7 investments currently available whose cash flows match the timing and amount of  
8 expected benefit payments.” Thus, the timing and amount of future benefit payments  
9 under the Company’s pension and OPEB plans must be considered in determining the  
10 discount rates and it is unacceptable to rely on the discount rates of other entities.

11 The Company’s independent third-party actuaries match the timing and capacity of  
12 high-quality fixed-income investments to the plan-specific projected cash flows in  
13 determining the discount rate. In accordance with ASC 715-30 and 715-60, this is  
14 performed each year-end when the projected benefit obligation is remeasured and  
15 thus is dependent upon rates at that point in time and the plan-specific projected cash  
16 flows.

17 With respect to the expected return on assets assumption, ASC 715-30-35-47  
18 states:

19 The expected long-term rate of return on plan assets shall reflect the  
20 average rate of earnings expected on the funds invested or to be  
21 invested to provide for the benefits included in the projected benefit  
22 obligation. In estimating that rate, appropriate consideration shall be  
23 given to the returns being earned by the plan assets in the fund and  
24 the rates of return expected to be available for reinvestment. The  
25 expected long-term rate of return on plan assets is used (with the  
26 market-related value of assets) to compute the expected return on  
27 assets. In the context of its use in this paragraph, funds to be invested  
28 refers only to the reinvestment of returns on existing plan assets.

1 ASC 715-60-35-84 similarly states:

2 The expected long-term rate of return on plan assets shall reflect the  
3 average rate of earnings expected on the existing assets that qualify  
4 as plan assets and contributions to the plan expected to be made  
5 during the period. In estimating that rate, appropriate consideration  
6 shall be given to the returns being earned on the plan assets currently  
7 invested and the rates of return expected to be available for  
8 reinvestment.

9 As a result, it is not acceptable under ASC 715-30 or 715-60 to rely on or utilize other  
10 entities' expected return on assets as the basis for the Company's asset return  
11 assumptions. Each plan's investment portfolio differs, for example, in investment  
12 mix, which is influenced by investment strategies that may change over time  
13 depending on a plan's funded status.

14 **Q. How do you respond to Mr. Storm's statement that the Company's expected**  
15 **return on assets is lower than that of its peers and CalPERS?**

16 A. As indicated above, it is unreasonable to compare the Company's assumptions to  
17 those of other entities' plans that do not have the same benefit obligations, future cash  
18 flow projections, funded status, etc. The Company's expected return on assets  
19 assumption is influenced by the plans' funded status, investment strategies and  
20 investment mix. Due to the favorable funded status of the plans, the investment  
21 portfolio has been de-risked over time resulting in a lower allocation to equities and  
22 return-seeking assets, which result in a lower return on plan assets. The path toward  
23 de-risking has been in place for several years as the funded status improved and helps  
24 mitigate having excess plan assets at the end of the plans which would be stranded or  
25 otherwise subject to significant income taxes if reverted to the Company (50 percent  
26 for pension plans and 100 percent for OPEB plans).

1           Mr. Storm compares the Company's expected return on assets assumption to  
2 that of peer utilities and CalPERS. Using CalPERS as an example as to why it is  
3 inappropriate to compare the Company's assumption to others, CalPERS currently  
4 has an expected return on assets assumption of 6.8 percent yet is not in a similar  
5 position as the Company's plans. CalPERS disclosed an actual funded status of  
6 70.6 percent and target funded status of 80-82 percent and a current investment mix  
7 of 8.3 percent private equities, 9.6 percent real assets, 29.8 percent global fixed  
8 income and 51.4 percent public equity. On a comparable tax funded status basis, the  
9 Company's pension plan was 114 percent funded at December 31, 2021. It is  
10 inappropriate to expect plan asset investment strategies to be similar with such a  
11 drastic difference in funded status and thus also inappropriate to expect the expected  
12 return on assets assumption to be similar.

13 **Q. Mr. Storm's recommended increase in the expected return on assets assumption**  
14 **also factors in historical asset return experience. Do you agree with this**  
15 **adjustment?**

16 A. No. As Mr. Storm indicates in his testimony, this assumption is intended to be  
17 forward looking and will differ from actual results as markets fluctuate. Any  
18 difference between expected and actual return on assets is reflected in pension and  
19 OPEB expense over time (average remaining participant lives for pension and  
20 average remaining service lives for OPEB) as part of the amortization of gain/loss  
21 component of net periodic benefit cost. Thus, to the extent actual returns differ from  
22 those included in the expected returns during the test period, there will not be an  
23 immediate impact to expense. Rather, any gain or loss will be recognized to expense



1 over a long period of time along with other actuarial gains and losses such as those  
2 that arise from changes in the discount rate with the opportunity to update in the  
3 Company's next general rate case.

4 **Q. How do you respond to Mr. Storm's statements that the discount rate**  
5 **assumption may be impacted by changes in the market?**

6 A. While the Company's benefit obligations are valued only upon a remeasurement as  
7 required under generally accepted accounting principles at which time the discount  
8 rate is refreshed, Mr. Storm is correct that if the Company were to remeasure its  
9 obligations today, the discount rate would have increased since the last  
10 remeasurement. The Company has experienced this in its 10-year plan projections  
11 provided by its actuaries. While Mr. Storm proposes a 50 basis point increase from  
12 the 2.90 percent discount rate reflected in the test period and the Company's last  
13 remeasurement, current projections reflect a 165 basis point increase to 4.55 percent  
14 based on discount rates determined as of April 30, 2022 for the Company's 10-year  
15 plan.

16 **Q. How is the discount rate assumption determined for the Company's plans?**

17 A. The Company utilizes its actuaries' bond matching analysis to compute an effective  
18 yield that incorporates high quality corporate bonds (average AA quality rating from  
19 S&P, Moody's and Fitch and excluding affiliate company bonds) with cash flows  
20 aligning to the expected cash flows of the plans. The results of the bond matching  
21 analysis are generally rounded to the nearest five basis points. The 2.90 percent  
22 discount rate utilized for the test period was determined as of December 31, 2021, in  
23 conjunction with the annual year-end remeasurement of the plan assets and benefit

1 obligations. The Company's actuaries provided updated projections in May 2022 for  
2 use in the Company's 10-year plan using the bond matching analysis as of April 30,  
3 2022. As a result of changes in the market, the discount rate has increased to  
4 4.55 percent.

5 **Q. What is your recommendation regarding the Company's net periodic benefit**  
6 **cost for its pension and OPEB plans?**

7 A. For the reasons set forth above, I recommend Mr. Storm's adjustments be rejected  
8 and that the latest projections provided by the Company's actuaries for 10-year plan  
9 purposes be reflected in order to capture the discount rate increase resulting from  
10 market changes. On a total-company basis, the updated projections result in an  
11 increase in 2023 base net periodic benefit cost of \$6.0 million for pension and OPEB  
12 combined including higher interest cost due to the higher discount rate and lower  
13 expected asset returns primarily due to projected 2022 asset performance, partially  
14 offset by lower loss amortization. This leads to an increase in total pension and  
15 OPEB expense of \$1.6 million on an Oregon-allocated basis inclusive of an update to  
16 the projected 2022 settlement loss to \$11.9 million from the \$9.8 million projected at  
17 the time my direct testimony was filed and with it being treated in the same manner as  
18 reflected in PacifiCorp's original filing.

19 **Q. Does this conclude your reply testimony?**

20 A. Yes.

**REDACTED**

Docket No. UE 399

Exhibit PAC/1301

Witness: Nikki L. Koblaha

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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**REDACTED**

Exhibit Accompanying Reply Testimony of Nikki L. Koblaha

Proforma Cost of LongTerm Debt

July 2022

**THIS EXHIBIT IS CONFIDENTIAL IN ITS  
ENTIRETY AND IS PROVIDED UNDER  
SEPARATE COVER**

Docket No. UE 399  
Exhibit PAC/1302  
Witness: Nikki L. Koblaha

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Nikki L. Koblaha  
NOL Example

July 2022

**NOL Example Calculation**

Item	Amount
Pre-Tax Book Income	100
Temporary Book-Tax Difference: Depreciation	(500) [B]
<b>Taxable Income / (Loss) before NOL Carryforward</b>	<b>(400)</b>
Net Operating Loss Carryforward	<b>400</b> [A]
Taxable Income per Tax Return	<b>0</b>
Tax Rate	25% [C]
<b>Current Income Tax (Benefit) / Expense</b>	<b>0</b>
Deferred Income Tax (Benefit) / Expense: NOL Carryforward	= [A] X [C] (100)
Deferred Income Tax (Benefit) / Expense: Depreciation	= [B] X [C] 125
<b>Total Income Tax (Benefit) / Expense</b>	<b>25</b>

**Journal Entry #1**

Acct. Description	FERC Acct.	DR	CR
Accumulated Deferred Income Tax Asset / (Liability): NOL Carryforward	190	100	
Deferred Income Tax (Benefit) / Expense: NOL Carryforward	411		(100)

*To record the deferred tax asset for the NOL carryforward generated during the tax year.*

**Journal Entry #2**

Acct. Description	FERC Acct.	DR	CR
Deferred Income Tax (Benefit) / Expense: Depreciation	410	125	
Accumulated Deferred Income Tax Asset / (Liability): Depreciation	282		(125)

*To record the deferred tax liability for the current-period temporary book-tax difference for depreciation.*

The example above clearly illustrates how income tax expense is reduced for income tax accounting and ratemaking purposes for the tax benefits of a net operating loss (NOL) in the year the NOL is generated. Because the NOL has not yet been realized by the company, it is recorded as a deferred tax asset (DTA), which is properly included in rate base.

Docket No. UE 399  
Exhibit PAC/1400  
Witness: Ann E. Bulkley

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Ann E. Bulkley

July 2022

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### **ATTACHED EXHIBITS**

Exhibit PAC/1401—Business Segment Data for WEC Energy Group, Inc.

Exhibit PAC/1402—Adjustment to Muldoon’s Constant Growth DCF Model; Adjustment to  
 Muldoon’s Hamada Equation; Adjustment to Muldoon’s Multi-Stage DCF  
 Model Y; Adjustment to Muldoon’s CAPM Analysis; Adjustment to  
 Muldoon’s ROE Analysis

Exhibit PAC/1403—Adjustments to Gorman’s Risk Premium Analysis

Exhibit PAC/1404—Adjustments to Gorman’s CAPM Analysis

1 **Q. Are you the same Ann E. Bulkley who previously submitted direct testimony in**  
2 **this proceeding on behalf of PacifiCorp d/b/a Pacific Power (PacifiCorp or the**  
3 **Company)?**

4 A. Yes.

5 **I. PURPOSE AND SUMMARY OF TESTIMONY**

6 **Q. What is the purpose of your reply testimony?**

7 A. The purpose of my reply testimony is to respond to the opening testimony of  
8 Mr. Matt Muldoon on behalf of the Staff of the Public Utility Commission of Oregon  
9 (Commission) (Staff), Mr. Michael P. Gorman on behalf of the Alliance of Western  
10 Energy Consumers (AWEC) and Oregon Citizens' Utility Board (CUB), Mr. Alex J.  
11 Kronauer on behalf of Walmart, Inc. (Walmart), Mr. Bradley G. Mullins on behalf of  
12 AWEC, and Mr. Lloyd C. Reed on behalf of the Klamath Water User's Association  
13 (KWUA) and Oregon Farm Bureau Federation (OFBF), as it relates to the just and  
14 reasonable return on equity (ROE) and the appropriate capital structure for PacifiCorp  
15 in Oregon.

16 **Q. Are you sponsoring any exhibits as part of your reply testimony?**

17 A. Yes, I am sponsoring Exhibits PAC/1401 through PAC/1404, which have been  
18 prepared by me or under my direct supervision.

19 **Q. How is the remainder of your reply testimony organized?**

20 A. The remainder of my reply testimony is organized as follows:

- 21 • In Section II, I provide a summary and overview of my reply testimony and  
22 the important factors to be considered in establishing the authorized ROE for  
23 PacifiCorp;

- 1           •     In Section III, I compare the other ROE witnesses' recommendations in this  
2                     proceeding to the returns for comparable vertically integrated electric utilities  
3                     nationwide;
- 4           •     In Section IV, I discuss the changes in capital market conditions since my  
5                     direct testimony was filed and respond to the other ROE witnesses' testimony  
6                     regarding the effect of economic and capital market conditions on the cost of  
7                     equity and the implications for the financial models used to estimate the  
8                     authorized ROE in this proceeding;
- 9           •     In Section V, I respond to Staff witness Mr. Muldoon's ROE and capital  
10                    structure analyses and recommendations;
- 11          •     In Section VI, I respond to AWEC/CUB witness Mr. Gorman's ROE and  
12                    capital structure analyses and recommendations;
- 13          •     In Section VII, I respond to Walmart witness Mr. Kronauer's testimony as it  
14                    relates to ROE;
- 15          •     In Section VIII, I respond to AWEC witness Mr. Mullins regarding the effect  
16                    of the Company's proposed changes to the transition adjustment mechanism  
17                    (TAM) and the power cost adjustment mechanism (PCAM) on the ROE;
- 18          •     In Section IX, I respond to KWUA/OFBF witness Mr. Reed's testimony as it  
19                    relates to ROE; and
- 20          •     Finally, in Section X, I summarize my conclusions and recommendations.

1                           **II.           SUMMARY AND OVERVIEW**

2   **Q.    What factors should be considered in evaluating the results of ROE models and**  
3                   **establishing the authorized ROE?**

4   A     The primary factors that should be considered are: (i) the importance of investors'  
5           actual return requirements and the critical role of judgment in selecting the  
6           appropriate ROE; (ii) the importance of providing a return that is comparable to  
7           returns on alternative investments with commensurate risk; (iii) the need for a return  
8           that supports a utility's ability to attract needed capital at reasonable terms; and (iv)  
9           the effect of current and expected capital market conditions.

10 **Q.    What are your key conclusions and recommendations regarding the appropriate**  
11 **ROE and capital structure for PacifiCorp?**

12 A.     I have organized my key conclusions by topic for the efficient review of the issues  
13           that are in dispute in this proceeding as well as provide an overview of my testimony  
14           by topic:

15           ***Reliance on Model Results***

16           1.     Staff witness Muldoon relies solely on the results of his Multi-Stage Discounted  
17           Cash Flow (DCF) analysis to develop his range of reasonableness of 8.95  
18           percent to 9.38 percent of which he selects the midpoint of 9.20 percent as his  
19           recommended ROE for PacifiCorp. However, these results are biased  
20           downwards due to the inputs Mr. Muldoon has selected to calculate his Multi-  
21           Stage DCF model. I have applied reasonable adjustments to his Multi-Stage  
22           DCF model such as:

- 1           a.     rely only on the results using my proxy group given the lack of  
2                    comparability of Mr. Muldoon’s proxy group to PacifiCorp;
- 3           b.     rely on Mr. Muldoon’s “Model Y” which is the version of his model  
4                    that considers earnings growth projections from Value Line;
- 5           c.     include the most current Value Line data <sup>1</sup> (i.e., dividends per share,  
6                    earnings per share (EPS), etc.) and more recent stock price data (first  
7                    trading day of May, June and July 2022);
- 8           d.     update the Hamada adjustment to include the most current Value Line  
9                    data, rely on the equity risk premium of 7.85 percent that Mr. Muldoon  
10                  used in his Capital Asset Pricing Model (CAPM) analysis and rely on  
11                  the Company’s proposed equity ratio of 52.25 percent; and
- 12          e.     develop the range of reasonable ROEs for PacifiCorp based on the  
13                  Multi-Stage DCF results using Mr. Muldoon’s historical Gross  
14                  Domestic Product (GDP) growth rate of 4.95 percent and my GDP  
15                  growth rate of 5.49 percent which Mr. Muldoon considered in  
16                  PacifiCorp’s last rate case, docket UE 374.

17                    Thus, by making reasonable adjustments, the results of Mr. Muldoon’s Multi-  
18                    Stage DCF analysis increase to a range of 9.80 percent to 10.22 percent, with an  
19                    approximate midpoint of 10.0 percent which is greater than the Company’s proposed  
20                    ROE of 9.80 percent.

- 21          2.     Mr. Muldoon developed a CAPM and concludes that the results of the analysis  
22                  support the high-end of his range of reasonableness of 9.38 percent. However,

---

<sup>1</sup> Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022.

1 his CAPM results range from 9.60 percent to 9.80 percent which are 22 to 42  
2 basis points higher than the high-end of Mr. Muldoon's range of reasonableness  
3 of 9.38 percent. Thus, Mr. Muldoon's CAPM results provide support for the  
4 conclusion that his Multi-Stage DCF model is understating the cost of equity  
5 for PacifiCorp.

6 3. Mr. Muldoon calculates a Constant Growth DCF model which results in an  
7 ROE range of 8.60 percent to 8.80 percent. As a result, Mr. Muldoon concludes  
8 that these results support the low-end of his range of reasonableness of 8.95  
9 percent. However, making reasonable adjustments to his Constant Growth DCF  
10 model to reflect more recent market data, rely only on my proxy group, and  
11 consider projected EPS growth rates in addition to projected dividend growth  
12 rates, increases the results of Mr. Muldoon's Constant Growth DCF model from  
13 8.80 percent to 9.40 percent. Furthermore, similar to the Multi-Stage DCF  
14 results, if Mr. Muldoon's Hamada (51 basis points for my proxy group) and  
15 Flotation cost (12.5 basis points) adjustments are added to the adjusted Constant  
16 Growth DCF results of 9.40 percent, the resulting ROE is 10.02 percent which  
17 is above the Company's requested ROE of 9.80 percent and clearly does not  
18 support the Multi-Stage DCF range estimated by Mr. Muldoon.

19 4. Mr. Gorman recommends an ROE of 9.25 percent for PacifiCorp, which is the  
20 midpoint of his estimated range of 8.80 percent to 9.70 percent. Mr. Gorman's  
21 DCF result sets the low end of this range and his CAPM sets the high end of  
22 the range. Here, too, when reasonable adjustments are made to Mr. Gorman's

1 DCF, Risk Premium and CAPM analyses, the range of results from his analyses  
2 become similar to the range developed using my methodologies:

3 a. While I do not propose a specific adjustment to Mr. Gorman's DCF, I  
4 recommend that the Commission disregard Mr. Gorman's Multi-Stage  
5 DCF results since these results are unreasonably low and below any  
6 comparable authorized ROE for a vertically integrated electric utility in  
7 the past 40 years. The remaining DCF results are Mr. Gorman's  
8 Constant Growth DCF model that relies on analysts' projected growth  
9 rates and his Constant Growth DCF analysis using "sustainable growth  
10 rates," which produce an approximate ROE range of 8.50 percent to  
11 9.70 percent.

12 b. Adjusting Mr. Gorman's Risk Premium analysis to calculate the risk  
13 premium using the methodology he has applied in prior cases, rely on  
14 the most recent *Blue Chip Financial Forecasts* report and projected  
15 utility bond yields to be consistent with his use of projected Treasury  
16 bond yields, his Risk Premium would result in an ROE range of 10.45  
17 percent to 10.69 percent. The average of these adjusted Risk Premium  
18 results is 10.57 percent which is 157 basis points higher than the 9.00  
19 percent ROE that Mr. Gorman indicates his Risk Premium supports.

20 c. Finally, adjusting Mr. Gorman's CAPM analyses to update the risk-free  
21 rate to reflect more current data than as of the end of April 2022 data on  
22 which Mr. Gorman relies; and reflect the current Value Line current  
23 betas of the proxy group, results in an updated CAPM range of 11.00

1                   percent to 11.03 percent which is significantly higher than the ROE  
2                   requested by the Company in this proceeding.

3                   Mr. Gorman's recommended ROE is based on the midpoint of his ROE  
4                   analyses. The midpoint of the results of Mr. Gorman's ROE analyses—when  
5                   reasonably adjusted—would be 10.06 percent, or higher than the Company's requested  
6                   ROE of 9.80 percent in this proceeding.

7                   ***Fair Return Standard***

8                   5.       As noted above, the other ROE witnesses in this proceeding recommend an  
9                   authorized ROE for PacifiCorp ranging from 9.20 percent to 9.50 percent,  
10                  which is below the average authorized ROE of 9.65 percent for comparable  
11                  vertically-integrated electric utilities since 2019. While authorized ROEs  
12                  provide a reasonable benchmark for investors' expectations as of the date of  
13                  these decisions, interest rates have been increasing and inflation remains at a  
14                  40-year high. Comparing these macroeconomic indicators to the 2019-2021  
15                  period demonstrates that the investor required return should be higher than was  
16                  set over this time period.

17                  Further the other ROE witnesses have not provided any analytical basis  
18                  for assuming that the Company has less risk than other comparable vertically-  
19                  integrated electric utilities across the United States, nor that it is a good  
20                  regulatory practice to set returns in Oregon below the historical national  
21                  average, particularly when market conditions demonstrate significantly higher  
22                  cost and risk than over the historical period. Based on these factors, the



1 recommendations of Mr. Muldoon, Mr. Gorman, and Mr. Reed would not meet  
2 the comparable return standard of *Hope* and *Bluefield*.

3 ***Capital Market Conditions***

4 6. Interest rates have increased and are expected to continue to increase to combat  
5 inflation. Since utility stock prices are inversely correlated with the yields on  
6 long-term government bonds, rising interest rates are projected to result in  
7 declining utility stock prices and increasing utility dividend yields. This means  
8 ROE models that rely on current and historical market data (i.e. current share  
9 prices in the DCF model and current yields on Treasury bonds in the CAPM)  
10 will likely underestimate the cost of equity over the near-term.

11 7. None of the other ROE witnesses in this proceeding have fully considered the  
12 effect of a rising interest rate environment or the effects of inflation on the cost  
13 of equity for PacifiCorp when developing their respective ROE  
14 recommendations. Since interest rates are expected to increase, it is reasonable  
15 to conclude that the DCF and CAPM results presented by Mr. Muldoon and Mr.  
16 Gorman are likely understating the cost of equity for PacifiCorp. Moreover, as  
17 noted in my direct testimony, the expected increase in interest rates warrants  
18 consideration of other ROE estimation models such as the CAPM, and Risk  
19 Premium analyses, using projections of where interest rates may be during the  
20 period that rates will be in effect to estimate the investor-required return over  
21 that same period.<sup>2</sup>

---

<sup>2</sup> PAC/300, Bulkley/23.

1           8.       The recent increase in interest rates has increased capital costs for the Company.  
2                   For example, as discussed in the reply testimony of Company witness Nikki  
3                   Kobliha (PAC/1300), the Company's projected long-term debt cost (4.38  
4                   percent to 4.72 percent) and discount rate assumption (2.90 percent to 4.55  
5                   percent) for the Company's defined pension and post-retirement plan have  
6                   increased from the rates that were assumed in the projected test year filed on  
7                   March 1, 2022.

8           ***Business Risks***

9           9.       Mr. Mullins appears to conclude the authorized ROE for the Company should  
10                   be reduced if the Commission approves the proposed change to TAM and the  
11                   PCAM to reflect the fact that the changes will reduce PacifiCorp's risk.  
12                   However, it is not reasonable to recommend a reduction in the ROE because a  
13                   company proposes a change to an existing cost recovery mechanism. The  
14                   appropriate approach is to compare the regulatory mechanisms of the Company  
15                   to the regulatory mechanisms of the proxy group being used to develop the ROE  
16                   to determine a company's relative regulatory risk as compared to the proxy  
17                   group. As shown in Figure 24 below and Exhibit PAC/310, 88.10 percent of the  
18                   operating companies held by the proxy group are allowed to pass through fuel  
19                   costs and purchased power costs directly to customers, without deadbands,  
20                   sharing bands, and earnings tests. PacifiCorp's proposal still includes a  
21                   deadband and earnings test; therefore, while the changes will move the  
22                   Company's PCAM closer to those approved for the proxy group, the changes  
23                   still result in increased fuel cost recovery risk relative to the proxy group.

1           10.    Mr. Mullins has not conducted any analysis to estimate the ROE for PacifiCorp  
2                    nor has he reviewed the proxy groups of any of the ROE witnesses in this case  
3                    to determine which cost recovery mechanisms have been approved for the  
4                    proxy group companies. Absent this comparison, there is no basis to conclude  
5                    that PacifiCorp’s ROE should be reduced due to the Company’s proposed  
6                    changes to the TAM and PCAM.

7            *Capital Structure*

8            11.    The Company’s proposed capital structure, which includes 52.25 percent  
9                    equity, is consistent with the actual capital structures of the utility operating  
10                  companies owned by the proxy group companies as shown in Exhibit PAC/311  
11                  and is therefore, reasonable.

12        **III.        OVERVIEW OF RETURN ON EQUITY RECOMMENDATIONS AND**  
13    **COMPARABLE RETURN STANDARD**

14        **Q.        Please summarize the ROE recommendations of the other ROE witnesses in this**  
15                    **proceeding.**

16        A.        **Figure 1** below summarizes the results of the ROE analyses presented by the other  
17                    witnesses in this proceeding and their final recommendations. The other ROE  
18                    witnesses in this proceeding recommend an authorized ROE for PacifiCorp between  
19                    9.00 percent and 9.50 percent. The following are important considerations when  
20                    reviewing the range of results and recommendations in **Figure 1**:

- 21                    •        While Mr. Muldoon has determined his ROE recommendation of 9.20 percent  
22                    based exclusively on the results of the Multi-Stage DCF model, as I will  
23                    discuss in more detail in Section V, the results of his Multi-Stage DCF model

1 are biased due to his selection of the proxy group and long-term growth rate.  
2 Furthermore, primary reliance on the DCF model is inappropriate given  
3 current market conditions and the expectation that interest rates are expected  
4 to increase.

5 • Many of the results of the analytical models developed by Mr. Gorman do not  
6 support his ROE recommendation.

7 • Mr. Gorman's criticisms of my methodologies challenge the validity of his  
8 own analyses. Mr. Gorman criticizes my use of projected earnings growth  
9 rates in the Constant Growth DCF model; however, the only version of the  
10 DCF model that supports his recommendation for PacifiCorp of 9.25 percent  
11 is his Constant Growth DCF model that relies on projected earnings growth.  
12 Further, Mr. Gorman criticizes the methodology I have used to estimate the  
13 long-term growth rate in my Multi-stage DCF model, while he applies the  
14 same methodology in establishing the expected market return used in his  
15 CAPM analysis.

16 • Mr. Reed has not conducted any independent analysis in this proceeding to  
17 support his ROE and capital structure recommendations. Without considering  
18 the investor required return in the current market, or the effect of market  
19 conditions on the Company's capital structure, Mr. Reed simply proposes that  
20 the Company's capital structure and ROE should be set at the level approved  
21 in the Company's last rate case.<sup>3</sup>

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<sup>3</sup> KWUA-OFBF/100, Reed/11.

1 **Figure 1: Summary of Other ROE Witnesses' Model Results<sup>4</sup>**

	<b>Mr. Muldoon (Staff)</b>	<b>Mr. Gorman (AWEC/CUB) Mean/Median</b>
Constant Growth DCF – Projected Dividend Growth Rate <sup>5</sup>	8.60%–8.80%	N/A%
Constant Growth DCF – Projected Earnings Growth	N/A	9.55%/9.65%
Constant Growth DCF – Sustainable Growth	N/A	8.34%/8.45%
Multi-Stage DCF	8.95%–9.38%	7.89%/7.96%
CAPM <sup>6</sup>	9.6%–9.8%	9.45%–9.70%
Risk Premium	N/A	8.98%–9.00%
ROE Recommendation	9.20%	9.25%

2 **Q. Are authorized returns in other jurisdictions a relevant benchmark to evaluate**  
 3 **the reasonableness of the ROE recommendations of the other ROE witnesses?**

4 A. Yes. The *Hope* and *Bluefield* cases establish that authorized ROEs be comparable to  
 5 other investments of commensurate risk. Therefore, the regulatory decisions of other  
 6 utility regulatory commissions provide a basic test of reasonableness and a  
 7 benchmark that investors consider in assessing the authorized ROE of one utility  
 8 against the returns available from other regulated utilities with comparable risk.  
 9 However, it is important to recognize the market conditions that were present at the  
 10 time that the return was authorized. Typically, the data that is used in a regulatory  
 11 proceeding can be several months prior to the decision date, therefore, it is important

<sup>4</sup> Walmart witness Mr. Kronauer and KWUA/OFBF witness Mr. Reed did not perform their own ROE analysis and Mr. Kronauer did not provide his own specific ROE recommendation. Therefore, they are not included in this summary table.

<sup>5</sup> Staff does not rely on the results of the Constant Growth DCF model, but rather uses this as a check on the Multi-Stage DCF results.

<sup>6</sup> Staff does not rely on the results of the CAPM, but rather uses this as a check on the Multi-Stage DCF results.

1 to consider the differences in market conditions between the evidence in a rate case  
2 and the current market conditions to understand whether or not an ROE is reasonable  
3 based on current market conditions.

4 **Q. Do the other ROE witnesses consider the returns authorized in other**  
5 **jurisdictions for electric utilities when developing their ROE recommendation?**

6 A. Yes. Mr. Muldoon, Mr. Gorman, and I agree that the principles established in *Hope*  
7 and *Bluefield* are fundamental requirements in setting the ROE for a regulated utility.  
8 Mr. Muldoon, Mr. Gorman as well as Mr. Kronauer do consider the returns  
9 authorized for electric utilities in other jurisdictions; however, the analyses conducted  
10 by these witnesses do not address the comparability of the companies in the  
11 authorized return sample, which biases the conclusions reached by these witnesses.

12 Mr. Muldoon relied on the simple annual average of authorized ROEs for all  
13 electric utilities in 2021 and 2022 Q1 to conclude that Company's requested ROE of  
14 9.80 percent does not have "any correlation" to the recent returns authorized for  
15 electric utilities.<sup>7</sup> Furthermore, Mr. Muldoon reviewed the simple annual average of  
16 authorized ROEs for all electric utilities from 1990 through 2021 to conclude that  
17 authorized ROEs have declined over the time period as the yields on long-term  
18 Treasury bonds have declined.<sup>8</sup> Mr. Gorman reviewed the annual averages of  
19 authorized ROEs for other electric utilities across the United States (U.S.) from 2006  
20 to 2022 to support his recommendation.<sup>9</sup> Mr. Gorman concluded that a majority of  
21 the authorized ROEs for electric utilities in 2022 have been below the 2022 average

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<sup>7</sup> Staff/100, Muldoon/29.

<sup>8</sup> Staff/100, Muldoon/40.

<sup>9</sup> AWEC-CUB/100, Gorman/6.

1 of 9.35 percent. Finally, Mr. Kronauer considers the average authorized return for  
2 vertically-integrated electric utilities since 2019 as well as the annual average  
3 authorized returns for each year from 2019 through 2022. From this information, he  
4 concludes that the Company's requested ROE of 9.80 percent is "counter to broader  
5 electric industry trends".<sup>10</sup>

6 **Q. Have Mr. Muldoon, Mr. Gorman, and Mr. Kronauer conducted reasonable**  
7 **analyses of the historical authorized ROE data?**

8 A. No. While it is useful to consider the historical authorized ROEs, an analyst cannot  
9 simply rely on the average returns as a benchmark for the return that is reasonable for  
10 the subject company. Much like the development of a comparable proxy group that is  
11 used to draw meaningful results about the cost of equity using traditional ROE  
12 estimation models, it is important to establish a comparable data set in reviewing  
13 authorized ROEs if this data is to be used as more than a general range of results.  
14 While the other ROE witnesses review this data, none of these witnesses have used  
15 this data to develop any meaningful analysis of the current ROE for PacifiCorp.  
16 While the average result may have some appeal due to its simplicity, the principles  
17 for estimating the cost of equity are not based on simplicity. Rather, in applying the  
18 *Hope* and *Bluefield* comparability standards, it is appropriate to consider recently  
19 authorized ROEs for electric utilities that investors would consider generally  
20 comparable in risk to the PacifiCorp. Therefore, in order to conduct an analysis of  
21 the authorized ROE data that meets the comparability standards, it is necessary to  
22 refine the data to identify a sample group that is reasonably comparable to the subject

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<sup>10</sup> Walmart/100, Kronauer/9.

1 company. None of the other ROE witnesses in this proceeding have conducted an  
2 analysis of recently authorized ROEs that meets the *Hope* and *Bluefield* comparability  
3 standard.

4 **Q. Have the other ROE witnesses included authorized returns in their samples that**  
5 **investors would not consider comparable to PacifiCorp?**

6 A. Yes. For example, PacifiCorp is a vertically-integrated electric utility; therefore, it  
7 would be reasonable to exclude the authorized ROEs for transmission and  
8 distribution-only electric utilities because vertically-integrated electric utilities often  
9 have greater risk than transmission and distribution-only utilities due to the  
10 incremental risk of generation.

- 11 • Mr. Muldoon and Mr. Gorman included the authorized returns for transmission  
12 and distribution-only electric utilities, which would likely bias the average  
13 authorized ROE calculation downwards.
- 14 • Mr. Kronauer recognizes the additional risk associated with a vertically-integrated  
15 electric utility and thus excludes distribution-only electric utilities; however, his  
16 sample of vertically-integrated electric utilities incorrectly includes the authorized  
17 returns for companies that were determined pursuant to a specified formula, as  
18 well as the authorized returns for companies operating in Arizona that relies on  
19 fair value rate base.
- 20 • It appears that none of these witnesses have conducted a more detailed review of  
21 the authorized returns used in their averages to determine whether the ROEs were  
22 in fact market determinations, or whether there were other factors addressed



1 through the ROE, such as reductions to the ROE to penalize the company for  
2 performance metrics.

3 **Q. Did you analyze the recently authorized return data to reflect cases that are**  
4 **more comparable to PacifiCorp?**

5 A. Yes, I did. In order to narrow the sample of recently authorized returns, I applied the  
6 following screening criteria to establish returns for companies that are of a similar  
7 risk profile as PacifiCorp:

- 8 1. Include only vertically-integrated electric utilities because they can typically  
9 have greater risk than transmission and distribution-only utilities due to the  
10 incremental risk of generation;
- 11 2. Exclude limited issue rider cases because these cases address only a specific  
12 issue or issues, such as generation assets being constructed and incremental  
13 construction risk, and not a utility's entire operations, so the returns authorized  
14 would not be comparable to a vertically-integrated utility;
- 15 3. Exclude jurisdictions subject to a ROE that is established using a formula as  
16 opposed to following an approach that is similar to what the Commission has  
17 typically considered in setting the ROE;
- 18 4. Exclude returns awarded in Arizona because it is a state that relies on fair value  
19 rate base usually calculated based on a weighting of original cost rate case and  
20 rate base estimated using the replacement cost new less depreciation method.  
21 In Arizona, a return is awarded on the rate base increment above original cost;  
22 however, the commission in Arizona has recently reduced the ROE for  
23 companies to account for the return granted on the fair value increment.

1           Therefore, recent ROEs in Arizona would not be considered comparable to the  
2           ROEs established in states that use original cost ratemaking and should be  
3           excluded.

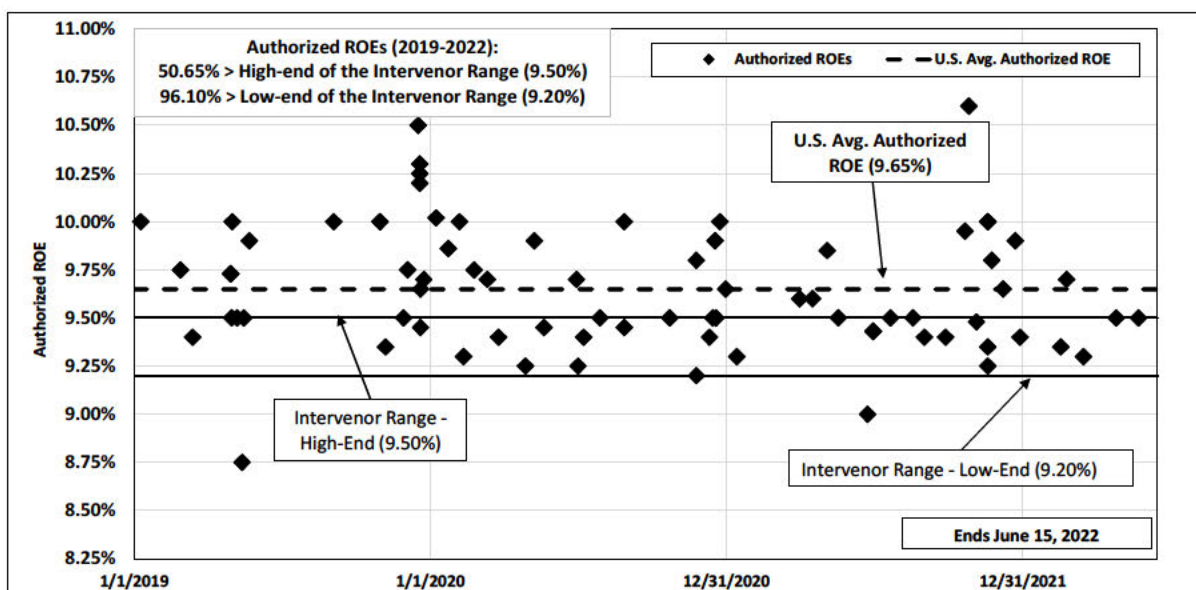
4           5.     Exclude authorized returns that reflect a utility-specific penalty because an  
5           authorized ROE that includes a penalty is not indicative of a market-derived  
6           cost of equity. For example, Central Maine Power Company was authorized an  
7           ROE in 2020 of 8.25 percent that reflected a 100-basis point penalty for  
8           management inefficiency, and is therefore not representative of a market-  
9           derived cost of equity and should be excluded from the recently authorized  
10          return data. It is important to note that Mr. Muldoon, and Mr. Gorman have  
11          included the authorized return for Central Maine Power, which is not only a  
12          distribution-only utility but also subject to a ROE penalty, in their respective  
13          analyses.

14   **Q.     What do you conclude from this analysis?**

15   A.     Figure 2 shows the authorized returns for vertically-integrated electric utilities in  
16          other jurisdictions since January 2019 excluding limited issue riders, ROEs  
17          established pursuant to a formula, and authorized returns that included a penalty,  
18          compared to the returns recommended by Mr. Muldoon (9.20 percent), Mr. Gorman  
19          (9.25 percent), and Mr. Reed (9.50 percent). Recent comparable authorized ROEs  
20          range from 8.75 percent to 10.60 percent, with an average of 9.65 percent.  
21          Furthermore, as shown in Figure 2, the majority of authorized returns for vertically-  
22          integrated electric utilities (*i.e.*, 39 out of 77 decisions, or 51 percent) from 2019  
23          through June 2022 have been greater than 9.50 percent, which is the high end of the

1 recommendations for the other ROE witnesses. The recommendations offered by the  
 2 other ROE witness range from 15 basis points to 45 basis points below the average of  
 3 comparable authorized ROEs for vertically-integrated electric utilities over the past  
 4 three and a half years.

5 **Figure 2: U.S. Authorized ROEs—Vertically-integrated Electric**  
 6 **Utilities January 2019 through June 2022<sup>11</sup>**



7 Proposing a return below the mean would indicate that each of the other ROE  
 8 witnesses believe PacifiCorp has less risk than other comparable vertically-integrated  
 9 electric utilities across the U.S.; however, none of the other ROE witnesses provide  
 10 any evidence to support this conclusion because they do not consider the relative risk  
 11 of PacifiCorp. Finally, none of the other ROE witnesses consider their  
 12 recommendations and recently authorized ROEs in the context of current market  
 13 conditions. Further, while the range of results presented in Figure 2 provides an  
 14 indicator of the investor-required return over this time period, in determining the

<sup>11</sup> S&P Capital IQ Pro. Data through June 15, 2022.

1 appropriate ROE for PacifiCorp, it is necessary to consider current inflationary  
2 pressures and the expectations for rising interest rates over the near-term which will  
3 increase the cost of equity for utilities going forward.

4 **Q. Have you also analyzed how authorized returns on equity in Oregon have**  
5 **compared with national averages over time?**

6 A. Yes. As shown in Figure 13 of my direct testimony, I analyzed authorized ROEs  
7 from 2009 through 2021 and evaluated how authorized ROEs in Oregon for electric  
8 utilities have compared with the national averages for vertically integrated electric  
9 utilities. As discussed in my direct testimony, the authorized returns for regulated  
10 electric utilities in Oregon from 2009 through 2021 have been consistently below the  
11 national average for vertically integrated electric utilities.<sup>12</sup> I attribute this, in large  
12 part, to the Commission's primary reliance on the results of the Multi-Stage DCF  
13 model to establish a utility's authorized ROE. While the Commission has considered  
14 whether the results of the Multi-Stage DCF model are reasonable by reference to  
15 other models such as the Constant Growth DCF model, the CAPM and the Risk  
16 Premium model, the Commission has not placed weight on those other models.

17 **Q. Why is it important to consider the results of the risk premium-based models,**  
18 **particularly in current market conditions?**

19 A. The risk-premium based models directly rely on interest rates as an input to the ROE  
20 calculation. Based on the current environment, where interest rates have been  
21 increasing, and the Federal Reserve has indicated that they will continue to increase  
22 interest rates to address inflationary pressures, it is important for the Commission to

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<sup>12</sup> PAC/300, Bulkley/56-57.

1 consider, the results of methodologies that estimate the changes in the ROE based on  
2 changes in interest rates to ensure that the authorized return is just and reasonable.  
3 Oregon utility subsidiaries must compete for capital within their own corporate  
4 structure, which must in turn compete for capital with other utilities and businesses  
5 across the country. If the authorized ROE for PacifiCorp is set at a level consistent  
6 with authorized ROEs outside Oregon, this will support PacifiCorp's access to capital  
7 and financial integrity over the longer-term.

8 **Q. Do you believe that it is still reasonable to consider recently authorized ROEs to**  
9 **benchmark the results of the ROE estimation models?**

10 A. Yes. Recently authorized ROEs provide a signal to investors as to the range of  
11 returns that can be expected in the industry. It is also necessary to consider the  
12 market conditions at the time that the returns were authorized and the lag that is  
13 inherent in the process. While a decision in an adjudicated proceeding is issued on a  
14 given date, it is often true that the data used as the basis for the decision in that  
15 proceeding are from a prior time period. Therefore, it is reasonable to rely on this  
16 information as a benchmark, but I would caution against using the specific averages  
17 as representative of the ROE at any given time without consideration of this time lag.

18 **Q. Are you aware of any utilities that have experienced either a credit rating**  
19 **downgrade or negative market response related to the financial effects of a rate**  
20 **case decision?**

21 A. Yes. As discussed in my direct testimony, ALLETE, Inc., CenterPoint Energy  
22 Houston Electric, and Pinnacle West Capital Corporation (PNW) each received credit

1 rating downgrades following a recent rate case decision for reasons that included a  
2 below average authorized ROE.<sup>13</sup>

3 **Q. What is your conclusion based on these facts?**

4 A. As outlined in *Hope* and *Bluefield*, the return authorized for PacifiCorp must be  
5 comparable to the returns on assets with comparable risk. Therefore, when  
6 considering authorized return data, it is equally important to determine if the sample  
7 of recently authorized returns is comprised of electric utilities that would be  
8 considered to have comparable risk to PacifiCorp. By including the returns of  
9 transmission and distribution-only electric utilities (*i.e.*, such as Mr. Muldoon and Mr.  
10 Gorman have done) and not excluding the returns in jurisdictions that do not  
11 determine the authorized ROE using a similar methodology as the Commission (*i.e.*,  
12 such as Mr. Muldoon, Mr. Gorman and Mr. Kronauer have done), the other ROE  
13 witness that have considered authorized returns have developed a data set of  
14 authorized returns that are not comparable to PacifiCorp, and therefore should not be  
15 used to determine the reasonableness of each witnesses' ROE recommendation.  
16 When a more reasonable sample of authorized returns is used, the ROE  
17 recommendations of each of the other ROE witnesses are below the average of  
18 comparable authorized ROEs for vertically-integrated electric utilities over the past  
19 three and a half years, and therefore would not meet the comparable return standard  
20 of *Hope* and *Bluefield*.

21 Furthermore, considering current and prospective market conditions of increasing interest

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<sup>13</sup> PAC/300, Bulkley/57-58. ALLETE, Inc. and PNW were downgraded due to a recent rate case decision for one of each company's operating subsidiaries. For ALLETE, Inc., this was a recent rate case decision for Minnesota Power while for PNW, it was a recent rate case decision for Arizona Public Service Company.

1 rates that investors expect to continue to increase over the near-term, authorized  
2 ROEs for vertically integrated electric utilities are based on data that is likely lagging  
3 by several months by the time the Commission’s order is issued. Since the other  
4 ROE witnesses’ recommendations are not even comparable to recently authorized  
5 ROEs, using data that lags current interest rates, suggests that their respective  
6 recommendations, which range from 9.20 percent to 9.50 percent, are likely to  
7 understate the cost of equity for utilities over the near-term as interest rates increase.

8 **IV. CAPITAL MARKET CONDITIONS AND THE IMPLICATIONS FOR**  
9 **THE COST OF EQUITY**

10 **Q. Do the other ROE witnesses adequately consider the implications of current and**  
11 **prospective capital market conditions on the cost of equity?**

12 A. No, they do not. Mr. Muldoon’s review of current and expected capital markets  
13 conditions is limited. Specifically, Mr. Muldoon develops two conclusions regarding  
14 current capital market conditions: 1) interest rates are not a “key driver” of utility  
15 shares prices<sup>14</sup>; and 2) while the Federal Reserve has proposed to raise interest rates,  
16 the Federal Reserve, to date, has only increased interest rates by less than 100 basis  
17 points resulting in Treasury yields that are still close to historical lows.<sup>15</sup>

18 Mr. Gorman reviews the recent monetary policy of the Federal Reserve and  
19 projections of interest rates over the short- and long-term and concludes that the cost  
20 of capital is expected to remain low “over at least the intermediate future”.<sup>16</sup>

21 According to Mr. Gorman, while there is the potential for the cost of capital to

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<sup>14</sup> Staff/100, Muldoon/13.

<sup>15</sup> Staff/100, Muldoon/40.

<sup>16</sup> AWEC-CUB/100, Gorman/13.

1 increase, increases in capital costs are not expected to be significant.<sup>17</sup> Furthermore,  
2 Mr. Gorman concludes that utilities have maintained “strong” valuations indicating  
3 that utilities have had access to capital markets at reasonable terms.<sup>18</sup> Finally,  
4 according to Mr. Gorman, while utilities followed the market through “downturns and  
5 recoveries” over the last few years, the sector has been less volatile during downturns;  
6 thus, Mr. Gorman concludes that investors view the utility sector as a “moderate- to  
7 low-risk investment option”.<sup>19</sup>

8 **Q. Do you agree with Mr. Muldoon’s and Mr. Gorman’s conclusions on capital**  
9 **markets and the effect of rising interest rates on the cost of equity for**  
10 **PacifiCorp?**

11 A. No, I do not. Mr. Muldoon’s review of interest rates fails to recognize the Federal  
12 Reserve’s actions and plans for addressing inflation which include seven additional  
13 rate increases in 2022 and two in 2023, increasing the Federal Funds rate to 3.4  
14 percent and 3.8 percent. Mr. Gorman’s conclusion that the cost of capital is expected  
15 to remain low is unsupported by a review of rising interest rates and high inflation.  
16 Mr. Gorman provides no evidence that the market shares his conclusion.

17 As is discussed in more detail in the remainder of this section, when setting  
18 the authorized ROE for PacifiCorp, it is important to consider whether current market  
19 conditions are expected to continue over the period during which the rates set in this  
20 proceeding will remain in effect. My review of market conditions demonstrates that  
21 the current market conditions likely result in market-based assumptions that will

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<sup>17</sup> AWEC-CUB/100, Gorman/16.

<sup>18</sup> AWEC-CUB/100, Gorman/9.

<sup>19</sup> AWEC-CUB/100, Gorman/10.



1           understate the cost of equity when applied in traditional ROE estimation models. The  
2           following key points support that conclusion:

3           1.       The Federal Reserve is aggressively normalizing monetary policy in response  
4           to sustained elevated levels of inflation. This change has resulted in increases  
5           in long-term government bond yields over the past few months and is likely to  
6           result in continued increases in long-term government bond yields over the  
7           near-term.

8           2.       The share prices of utilities are inversely related to interest rates. Investors  
9           expect interest rates to increase over the near-term, which will likely result in a  
10          decline in the share prices of utilities. A decline in share prices will increase the  
11          dividend yield and thus the cost of equity estimate of the DCF model. Therefore,  
12          current DCF results, which are based on historical data, are likely understating  
13          the cost of equity during the period that the Company's rates will be in effect.

14          3.       Current market conditions have affected the results of each of the ROE  
15          estimation models, requiring consideration of the results of multiple models and  
16          the use of informed judgment.

17          4.       While the ROE estimation models use some historical data (*i.e.*, stock prices  
18          and dividends in the DCF model, and bond yields in the CAPM), I believe it is  
19          appropriate to also consider near-term projections in the ROE estimation  
20          models based on the expectation that interest rates will increase.

21          5.       None of the other ROE witnesses in this proceeding have appropriately  
22          considered the effect of a rising interest rate environment or the effects of

1 inflation on the cost of equity for PacifiCorp when developing their respective  
2 ROE recommendations.

3 **Q. Are current stock prices and bond yields the best indicator of future market**  
4 **conditions?**

5 A. No. The argument that capital markets are perfectly efficient and thus current interest  
6 rates are the best measure of future interest rates completely disregards other factors  
7 that are influencing the cost of equity for regulated utilities, including growing  
8 inflationary pressure and changes in monetary policy by central banks. Reliance on  
9 current interest rates can lead to incorrect conclusions regarding the cost of equity,  
10 particularly when capital market conditions are changing and are not expected to be  
11 stable over the near-term. This is particularly important in the current proceeding  
12 because the DCF model relies on historical utility stock prices for calculating  
13 dividend yields that are projected to increase with rising interest rates. Furthermore,  
14 while interest rates are expected to rise, Mr. Muldoon selected the spot yield on the  
15 30-year Treasury bond as of June 3, 2022 as the risk-free rate in the CAPM.<sup>20</sup> The  
16 spot yield on the 30-year Treasury bond as of June 3, 2022 was 3.11 percent;  
17 however, as of June 24, 2022, the spot yield on the 30-year Treasury bond was 3.26  
18 percent, an increase of 15 basis points. Moreover, the spot yield as of the middle of  
19 June was: (1) only 22 basis points lower than the near-term projected yield of 3.48  
20 percent for 30-year Treasury bonds for the period of 2022 Q3 to 2023 Q3 as  
21 published by *Blue Chip Financial Forecasts*<sup>21</sup> and (2) well above the-then near-term

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<sup>20</sup> Mr. Muldoon indicated that he has relied on the yield on the 30-year Treasury bond as of June 3, 2022 of 2.94 percent as his estimate of the risk-free rate; however, the yield on the 30-year Treasury bond as of June 3, 2022 was 3.11 percent.

<sup>21</sup> Blue Chip Financial Forecasts, Vol. 41, No. 6, June 1, 2022, at 2.

1 projected yield of 2.52 percent for 30-year Treasury bonds that I relied on in the  
2 CAPM analysis in my direct testimony.

3 Therefore, given the increase in interest rates over the prior few months and  
4 the expectation that interest rates will increase over the near-term, it is important to  
5 rely on models that directly reflect these changes, such as the CAPM and Risk  
6 Premium models. Further, it is important to consider in those models the expected  
7 interest rates over the forward-looking period when rates will be in effect. Exclusive  
8 reliance on current Treasury yields in the CAPM is likely to understate the cost of  
9 equity over the near-term or the period that PacifiCorp's rates will be in effect.

10 **Q. Please summarize any changes in the monetary policy of the Federal Reserve**  
11 **that have occurred since you filed your direct testimony.**

12 A. Since I filed my direct testimony, the Federal Reserve has continued to accelerate the  
13 normalization of monetary policy in response to the significant increase in inflation  
14 that will be discussed in more detail below. As of the June 15, 2022 meeting, the  
15 Federal Reserve:

- 16 • Completed its taper of Treasury bond and mortgage-backed securities  
17 purchases;<sup>22</sup>
- 18 • Increased the target federal funds rate from 0.00 – 0.25 percent to 0.25 – 0.50  
19 percent at the March 16, 2022 meeting,<sup>23</sup> from 0.25 – 0.50 percent to 0.75 to

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<sup>22</sup> Federal Reserve Bank of New York, <https://www.newyorkfed.org/markets/domestic-market-operations/monetary-policy-implementation/treasury-securities/treasury-securities-operational-details#monthly-details>.

<sup>23</sup> Press Release, Federal Reserve, (Mar. 16, 2022).

1 1.00 percent at the May 4, 2022 meeting<sup>24</sup> and then from 0.75 to 1.00 percent  
2 to 1.50 percent to 1.75 percent at the June 15, 2022 meeting;<sup>25</sup>

- 3 • Forecasted a total of seven additional 25 basis point rate increases in 2022 and  
4 two 25 basis point rate increases in 2023 which resulted a median forecast of  
5 the federal funds rate of 3.4 percent and 3.8 percent, respectively;<sup>26</sup> and
- 6 • Started reducing its holdings of Treasury and mortgage-backed securities on  
7 June 1, 2022. The Federal Reserve will reduce the size of its balance sheet by  
8 only reinvesting principal payments on owned securities after the total amount  
9 of payments received exceeds a defined cap. For Treasury Securities, the cap  
10 will be set at \$30 billion per month for the first three months and \$60 billion  
11 per month after the first three months while for mortgage-backed securities  
12 the cap will be set at \$17.5 billion per month for the first three months and  
13 \$35 billion per month after the first three months.<sup>27</sup>

14 **Q. Has the Federal Reserve provided additional support for the expectation that it**  
15 **will continue to aggressively normalize monetary policy to reduce inflation?**

16 A. Yes. Specifically, Federal Reserve Chairman Powell noted at his press conference on  
17 June 15, 2022, that reducing inflation to the long-term goal of 2 percent was the  
18 primary objective and that additional rate increases will be necessary with a 50 or 75  
19 basis point increase likely needed at the next meeting:

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<sup>24</sup> Press Release, Federal Reserve (May 4, 2022).

<sup>25</sup> Press Release, Federal Reserve (June 15, 2022).

<sup>26</sup> Federal Reserve, Summary of Economic Projections, June 15, 2022, at 2.

<sup>27</sup> Federal Reserve, Plans for Reducing the Size of the Federal Reserve's Balance Sheet, Press Release, May 4, 2022.

1 Over coming months, we will be looking for compelling evidence  
2 that inflation is moving down, consistent with inflation returning to  
3 2 percent. We anticipate that ongoing rate increases will be  
4 appropriate; the pace of those changes will continue to depend on  
5 the incoming data and the evolving outlook for the economy.  
6 Clearly, today's 75 basis point increase is an unusually large one,  
7 and I do not expect moves of this size to be common. From the  
8 perspective of today, either a 50 or 75 basis point increase seems  
9 most likely at our next meeting. We will, however, make our  
10 decisions meeting by meeting, and we will continue to communicate  
11 our thinking as clearly as we can. Our overarching focus is using our  
12 tools to bring inflation back down to our 2 percent goal and to keep  
13 longer-term inflation expectations well anchored.

14 Making appropriate monetary policy in this uncertain environment  
15 requires a recognition that the economy often evolves in unexpected  
16 ways. Inflation has obviously surprised to the upside over the past  
17 year, and further surprises could be in store. We therefore will need  
18 to be nimble in responding to incoming data and the evolving  
19 outlook. And we will strive to avoid adding uncertainty in what is  
20 already an extraordinarily challenging and uncertain time. We are  
21 highly attentive to inflation risks and determined to take the  
22 measures necessary to restore price stability. The American  
23 economy is very strong and well positioned to handle tighter  
24 monetary policy.<sup>28</sup>

25 **Q. Mr. Muldoon states that as of the filing of his opening testimony, the Federal**  
26 **Reserve has increased the federal funds rate less than 100 basis points.<sup>29</sup> Is that**  
27 **correct?**

28 A. No, it is not. Mr. Muldoon filed his opening testimony on June 22, 2022; however, as  
29 noted above, as of June 15, 2022, the Federal Reserve had increased the federal funds  
30 rate by 150 basis points. Furthermore, Mr. Muldoon has failed to acknowledge that  
31 the Federal Reserve has projected a federal funds rate of 3.80 percent by 2023 which  
32 would imply an additional increase over the next year of approximately 225 basis  
33 points to arrive at a target federal funds rate range of 3.75 to 4.00 percent. Finally, as

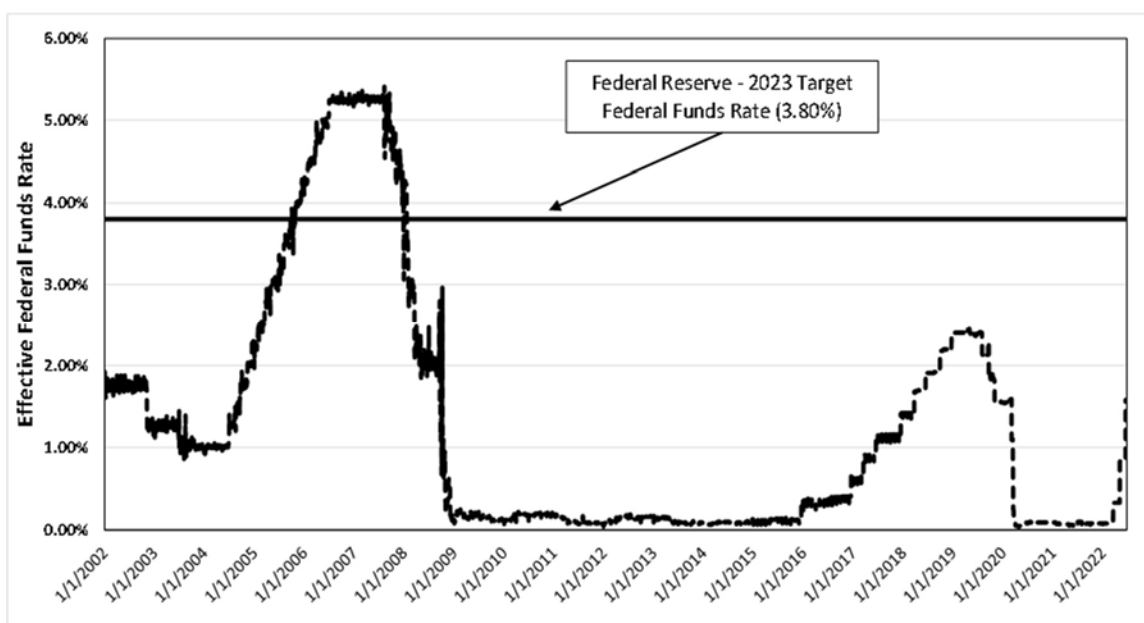
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<sup>28</sup> Federal Reserve, Transcript of Chair Powell's Press Conference Opening Statement, June 15, 2022, at 4-5.

<sup>29</sup> Staff/100, Muldoon/40.

1 shown in Figure 3 below, if the Federal Reserve increases the federal funds rate to  
 2 3.80 percent by 2023 as expected, the federal funds rates will be at a level not seen  
 3 since prior to the Great Recession of 2008/09. Counter to the claim of Mr. Muldoon,  
 4 it is likely that monetary policy normalization of this magnitude and pace will result  
 5 in increases in long-term government yields. In fact, as I will discuss in more detail  
 6 below, long-term government bond yields have increased significantly over the past  
 7 few months and are not close to all-time lows as Mr. Muldoon contends.

8 **Figure 3: Effective Federal Funds Rate – January 2002 – June 2022<sup>30</sup>**



9 **Q. Has inflation increased since you filed your direct testimony?**

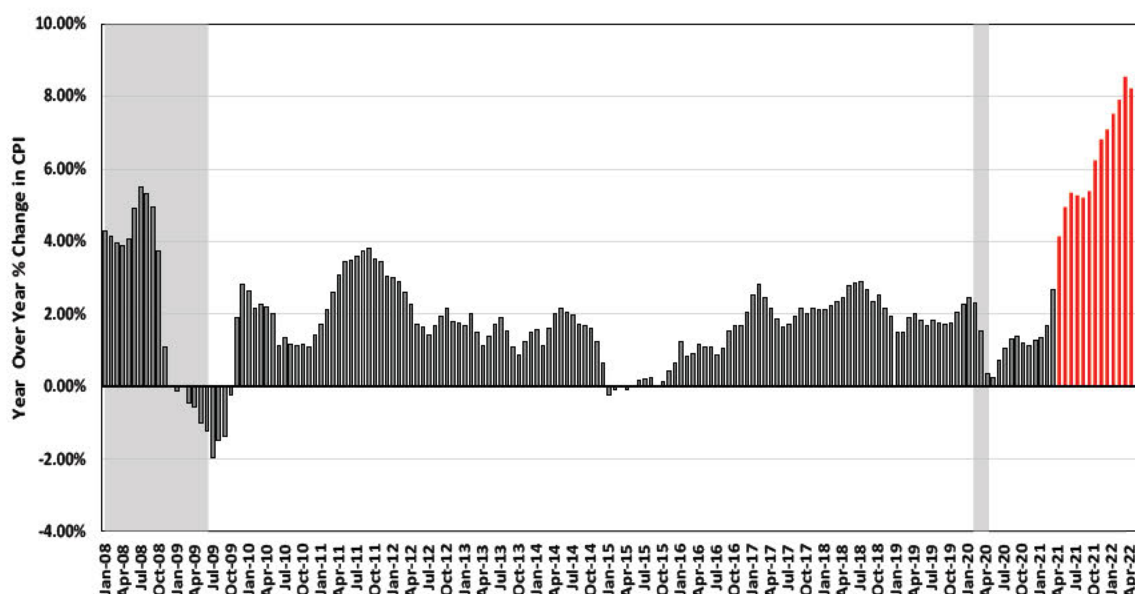
10 A. Yes, it has. As noted in my direct testimony, the year-over-year (YOY) change in the  
 11 Consumer Price Index (CPI) was 1.37 percent in January 2021 and 7.12 percent in  
 12 December 2022.<sup>31</sup> As shown in Figure 4, which updates Figure 2 from my direct

<sup>30</sup> Federal Reserve Bank of New York, Effective Federal Funds Rate [EFFR], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/EFFR>, June 27, 2022.

<sup>31</sup> PAC/300, Bulkley/17.

1 testimony, the U.S. Bureau of Labor Statistics recently reported that the CPI  
 2 increased at an annual rate of 8.52 percent for the 12-month period ending May 31,  
 3 2022. This is an increase inflation of 1.4 percent in five months, since the data used  
 4 in my direct testimony. The 8.52 percent YOY in the CPI in May 2022 is down  
 5 slightly from the high of 8.56 percent in March 2022 which was the largest 12-month  
 6 increase since 1981.

7 **Figure 4: CPI – YOY Percent Change – January 2008 – May 2022<sup>32</sup>**



8 **Q. Do any of the other ROE witnesses consider the effects of inflation in their**  
 9 **recommended ROEs?**

10 A. No, they do not. While Mr. Muldoon<sup>33</sup> and Mr. Gorman<sup>34</sup> note that the Federal  
 11 Reserve is currently normalizing monetary policy to respond to increased inflation,  
 12 both witnesses seemingly conclude that this change in market conditions will not

<sup>32</sup> Bureau of Labor Statistics, shaded area indicates a recession.

<sup>33</sup> Staff/100, Muldoon/10 and 13.

<sup>34</sup> AWEC-CUB/100, Gorman/11-16.

1 affect the cost of equity for the utility sector. The failure to consider inflation in the  
2 estimate of the ROE in this proceeding is unreasonable given the rapid rise in  
3 inflation in recent months and the ongoing uncertainty regarding the magnitude and  
4 pace of monetary policy tightening by the Federal Reserve.

5 **Q. Do investors expect inflation pressures to continue for a number of years?**

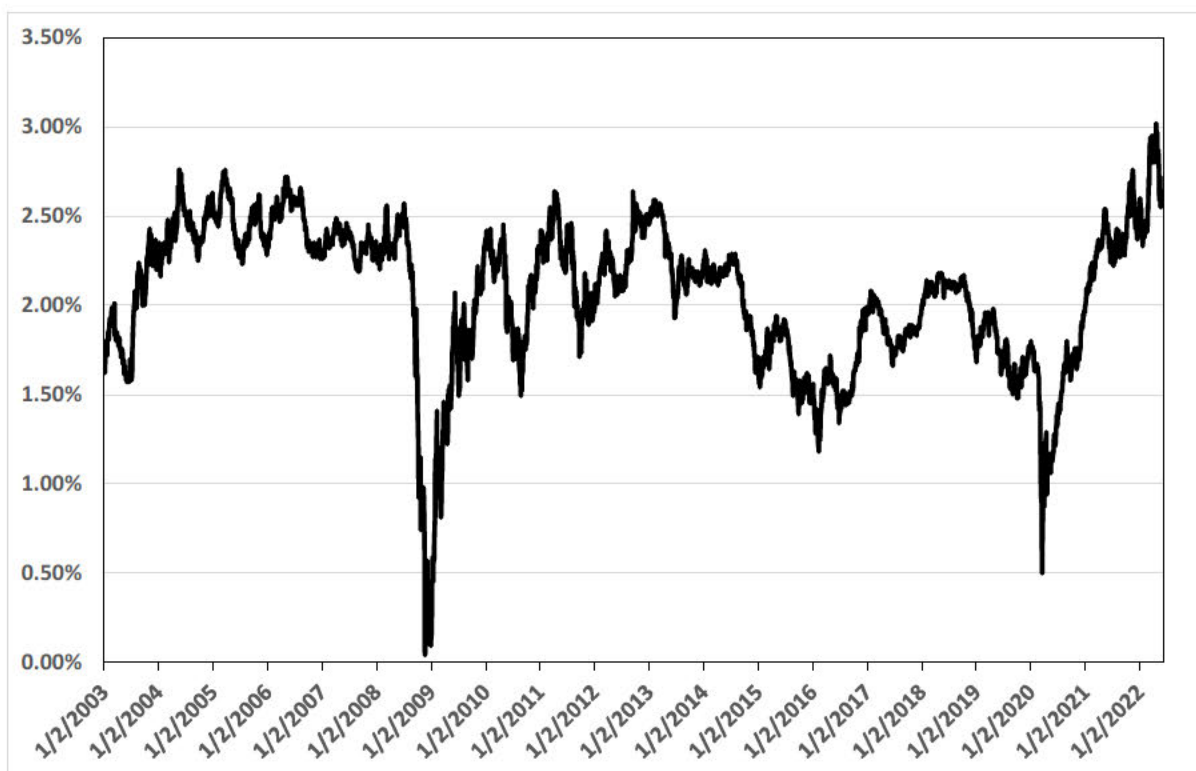
6 A. Yes. One measure of investors' expectations regarding inflation is the breakeven  
7 inflation rate calculated as the spread between the yield on a Treasury bond and the  
8 yield on a Treasury Inflation-Protected bond, which would account for the effect of  
9 inflation. The maturity of the bond selected would then reflect investors' views of  
10 inflation during the holding period of the bond.

11 For example, the 10-year breakeven inflation rate is calculated as the spread  
12 between the 10-year Treasury bond yield and the 10-year Treasury Inflation-Protected  
13 bond yield. As shown in Figure 5, the 10-year breakeven inflation rate is currently  
14 greater than any level seen since January 2003. Furthermore, the 30-day average of  
15 the 10-year breakeven inflation rate as of June 15, 2022 was 2.69 percent, indicating  
16 that investors expect inflation will remain well above the Federal Reserve's 2 percent  
17 target over the next 10 years. There are many factors as to why inflation is expected  
18 to remain elevated. For example, Kiplinger recently noted a few factors, including  
19 supply shortages due to COVID-19 and Russia's war in Ukraine, which led Kiplinger  
20 to forecast an inflation rate of 8 percent for 2022:



1 Gasoline prices continued their strong rise in June, and the overall  
 2 inflation rate is likely to stay at the same high level in June. It should  
 3 peak at about 9% by the end of the summer, then decline gradually  
 4 after that, ending the year at about 8.0% before dropping to 3-4%  
 5 next year. The higher cost of housing will still keep inflation rates  
 6 elevated for some time to come. Gasoline prices and heating costs  
 7 are likely to stay high for a good while because of the war in  
 8 Ukraine, but energy prices are likely to peak during the summer and  
 9 ease after that. The price of cars and trucks will also stay at a high  
 10 level until the semiconductor shortage ends sometime next year.  
 11 Continued spot shortages of various items will drive their prices up,  
 12 adding to the overall inflation rate. The latest is a shortage of  
 13 tampons.<sup>35</sup>

14 **Figure 5: 10-year Breakeven Inflation Rate – January 2003 – June 15, 2022<sup>36</sup>**



<sup>35</sup> David Payne, Inflation Should Peak This Summer at About 9%, Kiplinger (June 10, 2022).

<sup>36</sup> Federal Reserve Bank of St. Louis, 10-Year Breakeven Inflation Rate [T10YIE], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/T10YIE>, June 16, 2022.

1 **Q. Does the Treasury Inflation-Protected Securities (TIPS) implied inflation**  
2 **forecast relied on by Mr. Muldoon provide additional support for the**  
3 **expectation that inflation will remain elevated over the near-term?**

4 A. Yes. To develop his estimate of projected inflation for his Multi-Stage DCF model,  
5 Mr. Muldoon used a similar calculation as was described above and shown in Figure  
6 5 and estimated in addition to the 10-year breakeven inflation rate, the five-year and  
7 seven-year breakeven inflation rates. As shown in workpaper, UE 399 Staff OT  
8 Exhibit 108 WP Muldoon TIPS Implied Inflation, Mr. Muldoon estimated a five-year  
9 breakeven inflation rate of 3.03 percent and a seven-year breakeven inflation rate of  
10 2.82 percent as of 2022 Q1. Therefore, by Mr. Muldoon's own estimation, inflation  
11 is expected to remain well above the Federal Reserve's target inflation rate of 2  
12 percent for the next five and seven years.

13 **Q. What is the effect of inflation on long-term interest rates?**

14 A. As discussed in my direct testimony, inflation and the Federal Reserve's  
15 normalization of monetary policy will likely result in continued increases in long-  
16 term interest rates.<sup>37</sup> This is because inflation will reduce the purchasing power of the  
17 future interest payments; thus investors will require higher yields to compensate for  
18 the increased risk of inflation, resulting in increases in interest rates.

19 **Q. Have the yields on long-term government bonds increased in response to**  
20 **inflation and the Federal Reserve's normalization of monetary policy?**

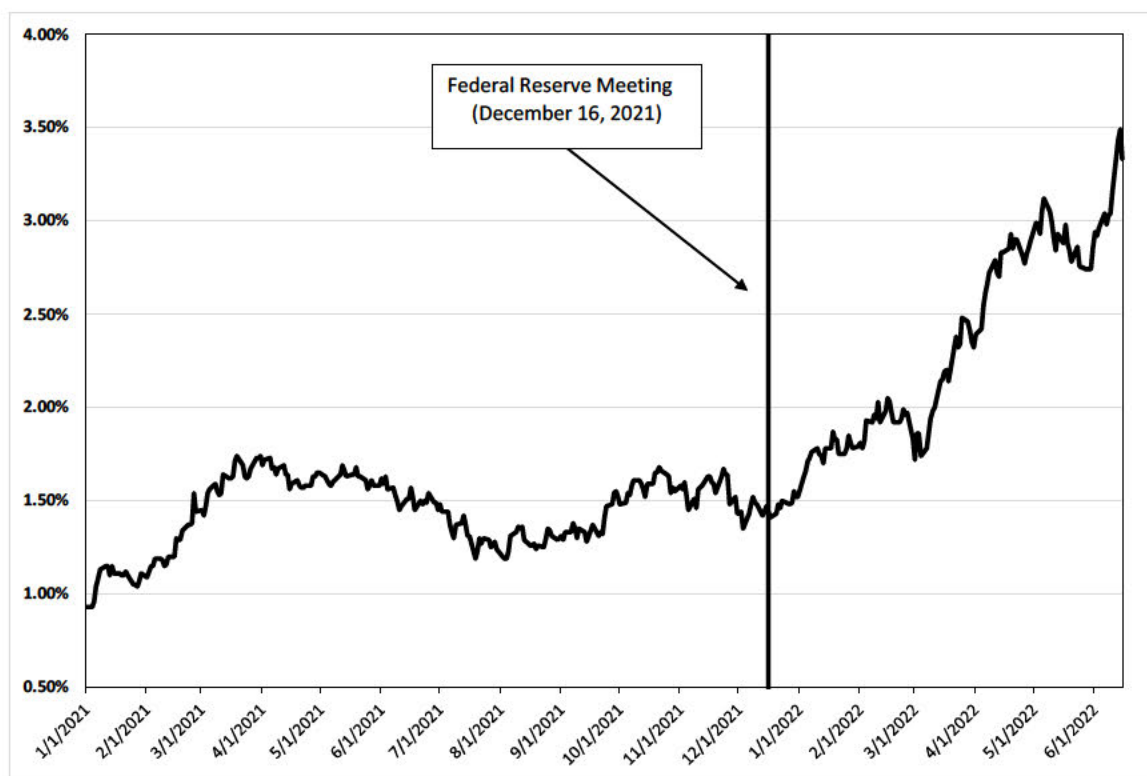
21 A. Yes, they have. As shown in Figure 6, since the Federal Reserve's December 2021  
22 meeting, as the process of normalizing monetary policy has accelerated to respond to

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<sup>37</sup> PAC/300, Bulkley/18.

1 inflation, the yield on the 10-year Treasury bond has increased over 186 basis points  
 2 from 1.47 percent on December 15, 2021, to 3.33 percent on June 15, 2022. The  
 3 increase is due to the Federal Reserve’s announcements at its December 2021,  
 4 January 2022, March 2022, May 2022 and June 2022 meetings and the continued  
 5 increased levels of inflation that are now expected to persist much longer than the  
 6 Federal Reserve and investors had originally projected.

7 **Figure 6: 10-Year Treasury Bond Yield – January 2021 – June 2022<sup>38</sup>**



8 **Q. Have equity analysts adjusted their forecasts of long-term government bond**  
 9 **yields since you filed your direct testimony?**

10 A. Yes, they have. As shown in Figure 3 of my direct testimony, equity analysts at the  
 11 time were forecasting a range for the 10-year Treasury yield of between 1.75 percent

<sup>38</sup> S&P Capital IQ Pro.

1 and 2.50 percent by the end of 2022. However, as shown in Figure 7 below, equity  
 2 analysts have adjusted their forecasts for the yield on the 10-year Treasury bond yield  
 3 upwards and are now projecting a range of between 3.15 percent and 4.00 percent  
 4 through the end of 2022. In addition, it is important to note that the current 30-day  
 5 average yield on the 10-year Treasury Bond as of June 15, 2022 is already 3.12  
 6 percent and was trading as high as 3.49 percent as of June 14, 2022.

7 **Figure 7: Equity Analysts Forecast of the 10-year Treasury Yield**

	<b>Actual</b>
30-Day Average as of June 15, 2022	3.12%
	<b>2022 Forecast</b>
Advocate Capital Management <sup>39</sup>	4.00%
Goldman Sachs <sup>40</sup>	3.30%
Blue Chip Financial Forecasts (Consensus Estimate) <sup>41</sup>	3.28%
BMO Economics <sup>42</sup>	3.15%

8 **Q. Do you agree with Mr. Gorman that current projections of interest rates do not**  
 9 **support a “significant” increase in interest rates over the next few years?<sup>43</sup>**

10 **A.** No, I do not. As shown in Table 1 of Mr. Gorman’s Direct Testimony, the *Blue Chip*  
 11 *Financial Forecasts (Blue Chip)* report for June 2022 shows an increase in the yield

<sup>39</sup> MarketWatch, “This bond expert who called the spike in U.S. yields forecasts the 10-year to reach 4%,” May 7, 2022. <https://www.marketwatch.com/story/this-bond-expert-who-called-the-spike-in-u-s-yields-forecasts-the-10-year-to-reach-4-11651843223>.

<sup>40</sup> Amelia Pollard, Goldman Lifts Yield Forecasts, Sees 10-Year Treasuries at 3.3%., Bloomberg.com (May 12, 2022).

<sup>41</sup> Blue Chip Financial Forecasts, Vol. 41, No. 6, June 1, 2022, at 2.

<sup>42</sup> BMO Economics, “Rates Scenario for May 11, 2022,” May 11, 2022.

<sup>43</sup> AWEC-CUB/100, Gorman/13.

1 on the 30-year Treasury Bond Yield of 130 basis points from 2.3 percent in Q1/2022  
2 to 3.6 percent in Q3/2023.<sup>44</sup> Additionally, according to the *Blue Chip* report in June  
3 2021, the five-year average yield on the 30-year Treasury Bond from 2024 to 2028 is  
4 expected to be 3.8 percent.<sup>45</sup> Furthermore, it is important to note that the yield on the  
5 30-year Treasury bond may increase more significantly than is forecasted by *Blue*  
6 *Chip*. For example, the yield on the 30-year Treasury Bond was 3.45 percent as of  
7 June 14, 2022, which is already slightly higher than the *Blue Chip* forecast for  
8 Q4/2022 of 3.4 percent and only 15 basis points below the *Blue Chip* forecast for  
9 Q3/2023 of 3.6 percent as of June 2022. Therefore, the yields on long-term interest  
10 rates are expected to increase over the period that PacifiCorp's rates will be in effect.  
11 While Mr. Gorman has reviewed projected interest rates, his conclusion that interest  
12 rates will not affect the cost of equity for PacifiCorp over the near-term runs counter  
13 to the historical relationship between interest rates and the cost of equity.

14 **Q. Has the Company's proposed long-term cost of debt increased since you filed**  
15 **Direct Testimony?**

16 A. Yes, it has. As discussed in the reply testimony of Company witness Nikki Koblaha  
17 (PAC/1300), the Company's projected long-term debt cost is currently 4.72 percent  
18 which is an increase of 34 basis points from Company's proposed long-term debt cost  
19 of 4.38 percent as of the filing of the Company's Direct Testimony on March 1,  
20 2022.<sup>46</sup> Furthermore, as also discussed by Ms. Koblaha, the discount rate assumption  
21 for the Company's defined pension and post-retirement plan has also increased

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<sup>44</sup> AWEC-CUB/100, Gorman/14.

<sup>45</sup> Blue Chip Financial Forecasts, Vol. 41, No. 6, June 1, 2021, at 14.

<sup>46</sup> PAC/1300, Koblaha/9.

1 significantly over the past few months. The discount rate assumption as of April 30,  
2 2022 is 4.55 percent which is an increase of 165 basis points from the discount rate  
3 assumed in the test period and measured as of December 31, 2021 of 2.90 percent.<sup>47</sup>

4 As noted by Ms. Koblaha, the updated discount rate increases the Company's pension  
5 and post-retirement benefits costs. The recent increases in interest rates due to  
6 inflation and the Federal Reserve's normalization of monetary policy have caused  
7 significant increases in capital costs for the Company.

8 **Q. Mr. Muldoon states that interest rates are not a "key driver" of utility share**  
9 **prices.<sup>48</sup> Is this a correct statement?**

10 A. No, it is not. Interest rates and utility share prices are inversely correlated, which  
11 means, for example, that an increase in interest rates will result in a decline in the  
12 share prices of utilities. As noted in my direct testimony, Goldman Sachs and  
13 Deutsche Bank both recently observed that utility share prices had one of the  
14 strongest negative relationships with bond yields.<sup>49</sup> In fact, the inverse correlation  
15 between interest rates and utility share prices is noted in a *Wall Street Journal* article  
16 referenced by Mr. Muldoon and provided in Exhibit Staff/109:

17 Still, the sector's rally is something of an anomaly given the  
18 macroeconomic environment. Utility stocks tend not to take well to  
19 rising interest rates for two reasons: First, utilities have large debt  
20 burdens, with those in the S&P 500 on average carrying net debt that  
21 is more than five times earnings before interest, taxes, depreciation  
22 and amortization, according to S&P Global Market Intelligence.  
23 **Second, they are a bond substitute. When interest rates rise,**  
24 **utilities' dividend yields start looking less attractive compared**  
25 **with Treasurys.** At one point during the early-2020 recession, the  
26 dividend yield on utility stocks was nearly 4 percentage points

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<sup>47</sup> PAC/1300, Koblaha/23 - 24.

<sup>48</sup> Staff/100, Muldoon/13.

<sup>49</sup> PAC/300, Bulkley/21.

1 higher than the yield on 10-year Treasury notes. That edge is now  
2 just 0.17 percentage point.<sup>50</sup>

3 In fact, the *Wall Street Journal* article ultimately concluded that “[i]n a  
4 softening stock market, though, these power lines are starting to look stretched,”  
5 indicating that given the recent increases in interest rates and the high valuations of  
6 utilities, investors should seek better investment alternatives.

7 **Q. In your direct testimony you noted that equity analysts expect the utility sector**  
8 **to underperform as interest rates increase.<sup>51</sup> Do equity analysts still expect**  
9 **utilities to underperform over the near-term?**

10 A. Yes, they do. In fact, Barron’s and Fidelity, each of which was referenced in my  
11 direct testimony, have published updated reports continuing to underweight the utility  
12 sector. For example, in Barron’s most recent Big Money poll, which closed in mid-  
13 April and surveyed 112 money managers regarding the outlook for the next 12  
14 months, the professional investors selected the utility sector as the least attractive of  
15 all industries for investment.<sup>52</sup> Additionally, Fidelity noted that its underweight  
16 recommendation on the sector reflected a combination of “poor fundamentals and  
17 expensive valuations.”<sup>53</sup>

18 **Q. What is the significance of the inverse relationship between interest rates and**  
19 **utility share prices in the current market?**

20 A. As discussed, the Federal Reserve is aggressively normalizing monetary policy in  
21 response to inflation, which is expected to increase long-term government bond

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<sup>50</sup> Staff/109, Muldoon/23-24. Jinjoo Lee, *How Utility Stocks Have Kept Their Spark*, Wall Street Journal (May 14, 2022) (emphasis added).

<sup>51</sup> PAC/300, Bulkley/21-22.

<sup>52</sup> Nicolas Jasinski, *Bearish Now, Bullish Later: How Investors Are Sizing Up Stocks*, Barron’s, updated (April 24, 2022).

<sup>53</sup> Denise Chisolm, *Chisolm: Top sectors to watch in Q2*, Fidelity (May 4, 2022).

1 yields. If interest rates increase as expected, then the share prices of utilities will  
2 decline, and dividend yields will increase. Consequently, the DCF model, which  
3 relies on historical average share prices, is likely to understate the cost of equity.<sup>54</sup>  
4 Likewise, relying on current interest rates (which will be well in the past by the time  
5 PacifiCorp's rates are made effective) in the CAPM will also tend to understate the  
6 cost of equity. Since interest rates are expected to increase, it is reasonable to  
7 conclude that both the DCF and CAPM results presented by Mr. Muldoon and Mr.  
8 Gorman are likely understating the cost of equity for PacifiCorp. Moreover, as noted  
9 in my direct testimony, the expected increase in interest rates warrants consideration  
10 of other ROE estimation models such as the CAPM, and Risk Premium analyses,  
11 which may better reflect expected market conditions through the use of forward-  
12 looking inputs.<sup>55</sup>

13 **Q. Mr. Gorman concludes that the DCF model is producing a “reasonable**  
14 **estimate” of the cost of equity for PacifiCorp.<sup>56</sup> How do you respond?**

15 A. Mr. Gorman concludes that the dividend yields for his proxy group are currently  
16 lower than the yield on A-rated utility bonds which means the valuations of utilities  
17 are returning to more normal levels since historically the yield on A-rated utility  
18 bonds has exceeded the dividend yield for utilities.<sup>57</sup> Therefore, since utilities have  
19 returned to more reasonable valuations, Mr. Gorman concludes that the dividend  
20 yield component of his DCF model is reasonable. First, while I disagree with  
21 Mr. Gorman's conclusion, it is important to note that Mr. Gorman appears to

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<sup>54</sup> PAC/300, Bulkley/22-23.

<sup>55</sup> PAC/300, Bulkley/23.

<sup>56</sup> AWEC-CUB/100, Gorman/4-5.

<sup>57</sup> AWEC-CUB/100, Gorman/4-5.



1 acknowledge that the dividend yield component of the DCF model may not produce  
2 an “economically logical return estimate” if the valuations of utilities are too high.  
3 Second, Mr. Gorman’s conclusion that utilities have returned to more normal  
4 valuations is incorrect and is in direct conflict with his conclusion on a subsequent  
5 page in his opening testimony. For example, Mr. Gorman also states subsequently  
6 that utilities currently have robust valuations with electric utilities having a price-to-  
7 earnings (P/E) ratio in 2021 of 20.96 as compared to the 20-year average P/E ratio of  
8 17.19.<sup>58</sup> This would imply that electric utilities still have valuations well above the  
9 historical average. Therefore, the current dividend yields that Mr. Gorman used to  
10 estimate his DCF model would not be representative of the dividend yields expected  
11 over the near-term if the valuations of utilities return to historical levels.

12 **Q. Are utility valuations expected to decline over the near-term?**

13 A. Yes. As noted above, the utility sector is classified as a defensive sector/“bond  
14 proxy” and is inversely related to changes in interest rates. Therefore, in the current  
15 market environment, the current high valuations and low dividend yields cited by  
16 Mr. Gorman are the primary reason investors expect the utility sector to underperform  
17 over the near-term. As the yield on long-term government bonds increases and  
18 becomes more comparable to the dividend yields for the utility sector, investors will  
19 rotate out of utility stocks and into government bonds which are offering more  
20 comparable returns with less risk.

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<sup>58</sup> AWEC-CUB/100, Gorman/ 9.

1 **Q. Have you examined the yield spread between the dividend yields for utilities and**  
2 **the yields on long-term government bonds?**

3 A. Yes, I have. I examined the yield spread between the dividend yields of utility stocks  
4 and the yields on long-term government bonds from January 2010 through May 2022.  
5 I selected the dividend yield on the Standard and Poor's (S&P) Utilities Index as the  
6 measure of the dividend yields for the utility sector and the yield on the 10-year  
7 Treasury Bond as the estimate of the yield on long-term government bonds. As  
8 shown in Figure 8, the yield spread as of May 31, 2022 was 0.00 percent indicating  
9 that yield on the 10-year Treasury Bond is currently equivalent to the dividend yield  
10 for the S&P Utilities Index. Furthermore, the current yield spread of 0.00 percent is  
11 well below the long-term average since January 2010 of 1.46 percent. Given that the  
12 yield spread is well below the long-term average as well as the expectation that  
13 interest rates will continue to increase, it is reasonable to conclude that utility sector  
14 will underperform over the near-term. This is because investors that purchased utility  
15 stocks as an alternative to the low yields on long-term government bonds will likely  
16 begin to rotate back into government bonds as the yields on long-term government  
17 bonds continue to increase, thus resulting in a decrease in the share prices of utilities  
18 and a concomitant increase in their dividend yields.

1 **Figure 8: Yield Spread between the Dividend Yield on the S&P Utilities Index and the**  
2 **Yield on the 10-year Treasury Bond – January 2010 – May 2022<sup>59</sup>**



3 **V. RESPONSE TO STAFF WITNESS MR. MULDOON**

4 **Q. Please summarize Staff's ROE analyses and recommendation.**

5 A. Mr. Muldoon develops a range of results of 8.95 percent to 9.38 percent, based on the  
6 results of his Multi-Stage DCF model.<sup>60</sup> Mr. Muldoon's ROE recommendation is  
7 based solely on the results of the Multi-Stage DCF model, from which he selects the  
8 approximate midpoint return of 9.20 percent. Mr. Muldoon also considers a Constant  
9 Growth DCF analysis and a CAPM analysis to test the reasonableness of his Multi-  
10 Stage DCF results, but does not give those other models any weight in establishing  
11 the recommended ROE for PacifiCorp.<sup>61</sup> Further, Muldoon recommends a capital  
12 structure comprised of 50.00 percent common equity, 49.99 percent long-term debt

<sup>59</sup> S&P Capital IQ Pro and Bloomberg Professional.

<sup>60</sup> Staff/100, Muldoon/23.

<sup>61</sup> *Id.*, at 23.

1 and 0.01 percent preferred equity.<sup>62</sup>

2 **Q. How does Mr. Muldoon’s ROE recommendation compare to authorized returns**  
3 **for vertically integrated electric utilities in other jurisdictions?**

4 A. Even though Mr. Muldoon cites the *Hope* and *Bluefield* decisions, which requires that  
5 the return for a regulated utility be comparable to returns available to investors in  
6 other investments with comparable risk, as shown in Figure 2 above, Mr. Muldoon’s  
7 ROE recommendation is substantially below the average authorized return for  
8 comparable vertically integrated electric utilities since 2019 of 9.65 percent.

9 Mr. Muldoon has not provided any evidence or supporting documentation that  
10 demonstrates why the authorized ROE for PacifiCorp should be set 45 basis points  
11 below the average return for comparable vertically integrated electric utilities.

12 **Q. What is your response to Mr. Muldoon’s approach to establishing the range and**  
13 **recommended ROE in this case?**

14 A. Mr. Muldoon’s ROE recommendation of 9.20 percent is based entirely on the results  
15 of his Multi-Stage DCF model. Mr. Muldoon contends that the results of his Multi-  
16 Stage DCF model are reasonable as compared with the ROE estimates produced by  
17 the Constant Growth DCF and CAPM methodologies. However, as explained later in  
18 my reply testimony, Mr. Muldoon’s estimates resulting from those models are based  
19 on flawed inputs and assumptions. In addition, as noted above, Mr. Muldoon fails to  
20 consider how his recommended ROE for PacifiCorp compares to authorized ROEs  
21 for comparable vertically integrated electric utilities in other jurisdictions. Lastly,  
22 Mr. Muldoon does not consider the incremental business risks of PacifiCorp relative

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<sup>62</sup> *Id.*, at 18.

1 to the proxy group, in establishing his ROE recommendation. In doing so,  
2 Mr. Muldoon effectively ignores the *Hope* decision to which they refer where the  
3 U.S. Supreme Court stated that “the return to the equity owner should be  
4 commensurate with returns on investments in other enterprises having corresponding  
5 risks.”

6 **Q. What are your principal areas of disagreement with Mr. Muldoon’s analyses**  
7 **and recommendation?**

8 A. While there are many areas of disagreement with the technical aspects of  
9 Mr. Muldoon’s analyses, as a practical matter, the most important area of  
10 disagreement is that Mr. Muldoon’s ROE recommendation of 9.20 percent would  
11 place PacifiCorp’s authorized return at the low end of the range of returns for  
12 vertically integrated electric utilities.

13 Mr. Muldoon and I disagree on the following aspects of the ROE estimation models and  
14 considerations in developing a recommended ROE: (1) the composition of the proxy  
15 group; (2) the relevance of the Multi-Stage DCF results and the time period over  
16 which those results should be calculated; (3) the application of the Multi-Stage DCF  
17 model, particularly the long-term growth rate assumption; (4) the importance of  
18 considering the results of multiple models, including the Constant Growth DCF,  
19 CAPM, and Risk Premium analyses to check the reasonableness of the DCF results  
20 and to inform the ultimate ROE recommendation; (5) other factors that support a cost  
21 of equity above the proxy group mean, including elevated capital spending levels and  
22 above average business risks relative to the proxy group; and (6) the appropriate  
23 capital structure for PacifiCorp.

1           A.     **Proxy Group Composition**

2     **Q.     Do you have any concerns with the screening criteria Mr. Muldoon has used to**  
3     **select its proxy group?**

4     A.     Yes, I do. As shown in **Figure 9** below, Mr. Muldoon's screening criteria results in  
5     the exclusion of 11 companies that would be considered comparable to PacifiCorp.  
6     As a result, there are four main areas where I disagree with the screening criteria that  
7     Mr. Muldoon has applied to the companies classified by Value Line as Electric  
8     Utilities:

- 9           1.     The requirement that a company have a credit rating within two notches above  
10           or below the current ratings for PacifiCorp, which, as shown in **Figure 9**, four  
11           companies included in my proxy group did not pass;
- 12           2.     The regulated electric utility revenue screen, which, as shown in **Figure 9**, three  
13           companies included in my proxy group did not pass;
- 14           3.     The capitalization screen that requires a company have a long-term debt ratio  
15           as calculated by Value Line between 45 percent and 55 percent, which, as  
16           shown in **Figure 9**, eight companies included in my proxy group did not pass;  
17           and
- 18           4.     The requirement that a company not be involved in merger or acquisition  
19           activity for the last five years, which, as shown in **Figure 9**, three companies  
20           included in my proxy group did not pass.

1  
2

**Figure 9: Bulkley Proxy Group Companies Eliminated Due to Mr. Muldoon's Screening Criteria<sup>63</sup>**

<b>Company</b>	<b>Credit Rating</b>	<b>Regulated Electric Revenue</b>	<b>Debt Ratio</b>	<b>M&amp;A Activity</b>
ALLETE, Inc.	Pass	Fail	Fail	Pass
American Electric Power Company, Inc.	Pass	Pass	Fail	Fail
Avista Corporation	Fail	Pass	Pass	Fail
CMS Energy Corporation	Pass	Pass	Fail	Pass
Entergy Corporation	Pass	Pass	Fail	Pass
IDACORP, Inc.	Fail	Pass	Pass	Pass
NextEra Energy, Inc.	Pass	Fail	Fail	Fail
NorthWestern Corporation	Fail	Pass	Pass	Pass
Otter Tail Corporation	Fail	Fail	Fail	Pass
Southern Company	Pass	Pass	Fail	Pass
Xcel Energy Inc.	Pass	Pass	Fail	Pass

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**1. Credit Rating Screening Criterion**

**Q. Why do you not agree with Mr. Muldoon's credit rating screen?**

A. While all of the witnesses in this proceeding who develop ROE estimates rely on a credit rating screen, Mr. Muldoon's credit rating screening criterion is very narrow, eliminating companies that do not have credit ratings within plus or minus two notches of PacifiCorp's A rating from S&P and A3 rating from Moody's. Both

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<sup>63</sup> Source: Staff/102 Muldoon/2

1 Mr. Gorman and I agree that investment grade credit ratings are a reasonable criterion  
2 to establish comparability.

3 **Q. What is the effect of Mr. Muldoon's narrowly defined credit rating criterion?**

4 A. Mr. Muldoon excludes companies from the proxy group if their credit rating is lower  
5 than BBB+ from S&P and Baa2 from Moody's. There are four companies (Avista  
6 Corporation (AVA), IDACORP, Inc. (IDA), NorthWestern Corporation (NWE), and  
7 Otter Tail Corporation (OTTR)) included in my proxy group that did not meet  
8 Mr. Muldoon's credit rating screening criterion.

9 **Q. Why is it more appropriate to use an investment grade credit rating screen?**

10 A. The development of the screening criteria is intended to establish a proxy group that  
11 is reasonably comparable to the subject company, yet not unnecessarily restrictive  
12 such that one individual estimated result can bias the analysis. In order to balance  
13 these interests, it is reasonable to include all companies with an investment grade  
14 rating in the proxy group because investors generally differentiate between  
15 investment grade and non-investment grade companies. Moreover, Mr. Muldoon has  
16 provided no support for his conclusion that two electric companies that have  
17 investment grade credit ratings separated by more than two notches would have  
18 substantially different business and financial risks that one would not be consider  
19 comparable to the other company.

20 **Q. Are there other reasons why Mr. Muldoon's credit rating screening criterion is**  
21 **overly restrictive?**

22 A. Yes. In the case of AVA, IDA, and OTTR, each of the companies has a Moody's  
23 credit rating within two notches of PacifiCorp's Moody's credit rating but are



1 excluded because AVA, IDA and OTTR have a S&P credit rating two notches below  
2 PacifiCorp's S&P credit rating. The requirement that a company have both a  
3 Moody's and S&P credit rating within two notches of PacifiCorp's credit ratings is  
4 unreasonably restrictive. It is unlikely that an investor would view a company as not  
5 comparable because a company's S&P credit rating was more than two notches from  
6 the subject company's S&P credit rating while the Moody's credit rating was less  
7 than two notches from the subject company's Moody's credit rating. As a result, I  
8 conclude that Mr. Muldoon's credit rating screen is too narrow and excludes  
9 companies that are reasonably comparable to PacifiCorp in terms of business and  
10 financial risk.

## 11 2. Regulated Electric Revenue Screening Criterion

12 **Q. Do you agree with Mr. Muldoon's application of a revenue screen to identify**  
13 **proxy companies that are primarily engaged in electric utility operations like**  
14 **PacifiCorp is in Oregon?**

15 A. No, I do not. Mr. Muldoon has selected companies for his proxy group that are  
16 "heavily regulated electric utility revenue". While this is not quantified in the  
17 testimony, in Exhibit Staff/102, it appears that Mr. Muldoon is applying a regulated  
18 revenue screen that excludes companies with less than 80 percent of revenues from  
19 regulated operations. I have two main concerns with Mr. Muldoon's "heavily  
20 regulated electric utility revenue" screen. First, the way that Mr. Muldoon applies  
21 this screen does not accomplish what he suggests, establishing a proxy group with  
22 significant **regulated electric** revenue. Mr. Muldoon's screening criterion, as  
23 applied, only ensures that the companies included in his proxy group have 80 percent

1 or greater revenues from **regulated operations**. Therefore, this screen does not  
2 ensure that the companies are primarily regulated electric utilities.

3 Second, I disagree with the use of revenue as the screening criterion. The use of revenue can  
4 skew the results of this screen based on changes in fuel costs and other operating  
5 costs. It is more appropriate to rely on net operating income because net operating  
6 income is more representative of the contribution of that business segment to  
7 earnings.

8 **Q. Does Mr. Muldoon’s misapplication of his regulated electric revenue screen**  
9 **result in the inclusion of companies that do not have “heavily regulated electric**  
10 **utility revenue”?**

11 A. Yes, it does. As noted above, Mr. Muldoon contends he has relied on a screening  
12 criteria that ensures the companies included in his proxy group derive a substantial  
13 portion of total revenues from regulated electric operations. However,  
14 Mr. Muldoon’s screen only determines if a company derives 80 percent of its total  
15 revenue from regulated operations. Mr. Muldoon does not determine the percentage  
16 of revenue derived from regulated electric operations. This results in the inclusion of  
17 companies that derive a significant portion of revenue from other regulated operations  
18 such as natural gas. For example, WEC Energy Group, Inc. was included in  
19 Mr. Muldoon’s proxy group; however, as shown in Exhibit PAC/1401, WEC Energy  
20 Group, Inc. derived only 57 percent of its total revenue from regulated electric  
21 operations for the three-year period of 2019-2021. WEC Energy Group, Inc. has  
22 significant regulated natural gas operations and therefore, from 2019–2021, WEC  
23 Energy Group, Inc. derived 41.96 percent of its total revenue from regulated natural

1 gas operations. It is clear that had Mr. Muldoon relied on a screen that ensured  
2 companies had “heavily regulated electric utility revenue” similar to PacifiCorp that  
3 WEC Energy Group, Inc. would not have been included in his proxy group.

4 **Q. Please explain why regulated operating income is a more appropriate screen**  
5 **than regulated revenues.**

6 A. Net operating income is more representative of the contribution of that business  
7 segment to earnings and the corporation’s overall financial position than total  
8 revenue. Specifically, a significant portion of electric utility company revenue is  
9 derived from the costs of purchased fuel and purchased power, which, in most cases,  
10 are recoverable through tracking mechanisms and do not, therefore, contribute to  
11 earnings. Furthermore, this portion of total revenue can fluctuate considerably based  
12 on the cost of fuel and purchased power. Therefore, relying exclusively on a revenue  
13 screen does not provide a clear or necessarily consistent indication of the contribution  
14 of the regulated utility operations to a company’s earnings. Net operating income  
15 excludes the cost of purchased commodity and therefore more closely represents the  
16 contribution of the business segment to a company’s earnings.

17 **Q. Do you have any concerns with the data that Mr. Muldoon has relied on to**  
18 **calculate his regulated revenue screen?**

19 A. Yes, I do. While Mr. Muldoon does not explicitly reference in his testimony the data  
20 source he has relied on to develop his regulated revenue screen, in Exhibit Staff/102,  
21 it appears Mr. Muldoon has developed his regulated revenue screen using data  
22 reported in the SEC Form 10-K. However, I am unable to verify the regulated  
23 revenue percentages that Mr. Muldoon has reported in Exhibit Staff/102 using from

1 the Form 10-K data for each of the companies. For example, Mr. Muldoon estimated  
2 that ALLETE, Inc. derived only 75 percent of its total revenue from regulated  
3 operations. As a result, ALLETE, Inc. did not meet Mr. Muldoon's regulated revenue  
4 screen which required regulated revenue of greater than 80 percent. However, in its  
5 2021 Form 10-K, ALLETE, Inc. reported that the company derived between  
6 84 percent and 87 percent of its total revenue from regulated operations for the period  
7 of 2019–2021.<sup>64</sup> Therefore, the company would meet Mr. Muldoon's regulated  
8 revenue screen.<sup>65</sup> It is unclear why Mr. Muldoon's regulated revenue percentage for  
9 ALLETE, Inc. deviated substantially from that reported by the company.

### 10 3. M&A Screening Criterion

#### 11 Q. Please explain the purpose of a M&A screening criterion.

12 A. The purpose of applying an M&A screen is to isolate companies that are involved in  
13 transformative transactions, that is transactions that will cause a fundamental change  
14 in a company and its financials. The larger the size of the transaction, the greater  
15 likelihood the transaction will have a significant effect on the share prices of the firms  
16 involved. Thus, it is important to exclude the companies from the proxy group that  
17 are involved in transformative transactions so that the temporary effect of the  
18 transaction does not affect the ROE model results. Excluding companies based on  
19 either smaller, non-transformative transactions or transactions that occurred well  
20 before the analytical period being relied on to estimate the ROE unnecessarily  
21 reduces the size of the proxy group and eliminates companies that investors would

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<sup>64</sup> ALLETE, Inc., 2021 Form 10-K, at 8.

<sup>65</sup> While ALLETE, Inc. would meet Mr. Muldoon's regulated revenue screen, the company does not meet Mr. Muldoon's debt ratio screen and would still be excluded from his proxy group. However, as I will discuss in more detail below, I disagree with Mr. Muldoon's use of a debt ratio screen.

1 consider comparable.

2 **Q. Is Mr. Muldoon's M&A screening criterion consistent with the objectives you**  
3 **described?**

4 A. No, it is not. Mr. Muldoon's merger screening criterion excludes companies that  
5 have been involved in significant M&A activity at any time during the past five years,  
6 when the market data that he relies on uses average stock prices on the first of the  
7 months of April through June 2022. It is unreasonable to assume that a transaction  
8 from five years ago would unduly influence the prices on these three days in 2022.

9 Second, Mr. Muldoon's application of the M&A screen resulted in American Electric Power  
10 Company, Inc. (AEP) not meeting his M&A screen even though AEP was not  
11 engaged in a transaction that would be considered transformative. Transactions that  
12 are smaller in size are less likely to affect the market data of the company.

13 **Q. Does Mr. Muldoon's misapplication of the M&A result in the exclusion of**  
14 **companies from his proxy group that were included in your proxy group?**

15 A. Yes. As shown in Exhibit Staff/102, Mr. Muldoon indicates that NextEra Energy,  
16 Inc. (NEE) would not have met his M&A screen due to two proposed transactions  
17 that were terminated several years ago and therefore could not have reasonably been  
18 expected to affect the stock prices on the three days Mr. Muldoon relied on in 2022.  
19 The first transaction was NEE's attempt to acquire Hawaiian Electric Industries, Inc.  
20 (HE) which was terminated in 2016 and the second was NEE's attempt to acquire  
21 Oncor Electric Delivery Company LLC which was terminated in 2017. First, NEE's  
22 acquisition of HE was terminated over five years so it is unclear why Mr. Muldoon is  
23 still listing this transaction for his M&A screen. Second, Mr. Muldoon relied on

1 stock price data as of the first trading day of April, May, and June 2022. As noted  
2 above, NEE's acquisition of Oncor was terminated in 2017 which is well outside of  
3 the historical data set used by Mr. Muldoon in his analysis. Since NEE's merger  
4 activity could not reasonably be expected to influence its stock price used in  
5 Mr. Muldoon's analysis, there is no basis to exclude NEE on M&A activity.<sup>66</sup>

6 **Q. Have you reviewed the transaction for AEP that Mr. Muldoon determined to be**  
7 **transformative?**

8 A. Yes, I did. **Figure 10** provides the detail behind the transaction that Mr. Muldoon  
9 deemed transformative for AEP. AEP has agreed to sell its subsidiary Kentucky  
10 Power Company to Liberty Utilities for \$2.85 billion. However, as shown in **Figure**  
11 **10**, AEP has total net utility plant as of 2020 of \$59.53 billion which means this  
12 transaction represented only 4.79 percent of 2020 net plant. **Figure 11** is an event  
13 study that compares the stock price of AEP to the S&P 500 index prior to and  
14 following the announcement of the transaction. As shown in this study, the stock  
15 price of AEP was not unduly influenced by the announcement of the sale of Kentucky  
16 Power Company. Therefore, it is reasonable to continue to include AEP in the proxy  
17 group.<sup>67</sup>

18 **Figure 10: Mr. Muldoon – Review of AEP M&A Transaction**

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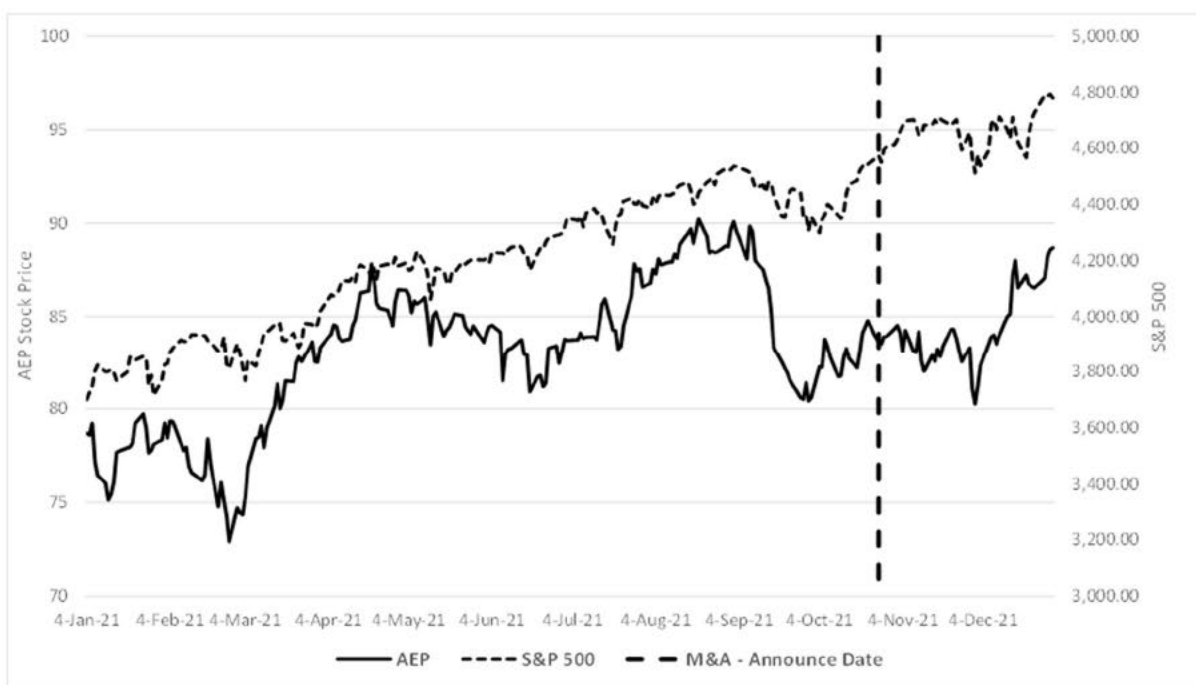
<sup>66</sup> While NEE should not be excluded on the basis of M&A activity, the company does not meet Mr. Muldoon's revenue and debt ratio screens and would still be excluded from his proxy group. However, as I discussed above, I disagree with the use of a revenue screen and do not believe Mr. Muldoon's regulated revenue calculation is correct. Moreover, as I will discuss in more detail below, I also disagree with Mr. Muldoon's use of a debt ratio screen.

<sup>67</sup> While AEP should not be excluded on the basis of M&A activity, the company does not meet Mr. Muldoon's debt ratio screen and would still be excluded from his proxy group. However, as I will discuss in more detail below, I disagree with Mr. Muldoon's use of a debt ratio screen.

Company	Ticke r	Acquisition/Sale				2020 Total	Price
		Description	Price (\$Billions)	Announced Date	Close Date	Net Plant (\$Billions)	/ Net Plant
American Electric Power Company, Inc.	AEP	Sale of Kentucky Power Company	\$2.85	10/26/2021	N/A	\$59.53	4.79 %

1

**Figure 11: AEP Stock Price**



2 **Q. Are there other companies that Mr. Muldoon should have excluded from his**  
3 **proxy group based on aberrations in stock price?**

4 **A.** Yes. Mr. Muldoon should have excluded PNW from his proxy group. As I discussed  
5 in my direct testimony, I excluded PNW from my proxy group because PNW's stock  
6 price declined approximately 24 percent over a two-month period from August 2021  
7 to November 2021 due to a negative regulatory decision for its largest operating  
8 company, APS. Based on this information, the dividend yield for Pinnacle West has  
9 been affected by a one-time event. Further, the Value Line five-year projected EPS

1 growth rates for this company have fallen from 5.0 percent in July 2021, prior to the  
2 deliberations in the rate proceeding to “Nil” in October 2021 and most recently  
3 1.5 percent in April 2022. This recent Value Line report noted that PNW’s earnings  
4 would “almost certainly decline in 2022” primarily related to the APS rate order.  
5 Based on the fact that the assumptions used in the DCF model have been affected  
6 significantly by this rate decision, I believe Mr. Muldoon should have excluded PNW  
7 from his proxy group.

8 **4. Long-term Debt Ratio Screening Criterion**

9 **Q. Please describe the screen Mr. Muldoon has applied based on the capital**  
10 **structure of the potential proxy group company.**

11 A. Mr. Muldoon includes companies in the proxy group if their capital structure has  
12 between 45 and 55 percent long-term debt according to Value Line. Mr. Muldoon  
13 provides no support for why this range is appropriate for PacifiCorp.

14 **Q. Is this screen reasonable?**

15 A. No. Mr. Muldoon’s use of a credit rating screen and a capital structure screen is  
16 unnecessary in that the financial risk that it apparently is being used to assess is  
17 addressed in another screen. Therefore, this criterion merely serves to reduce the size  
18 of the group without providing any benefit of making the group more comparable to  
19 PacifiCorp. As discussed previously, the development of the proxy group necessarily  
20 balances the size of the group with comparability. The use of a credit rating screen  
21 achieves this balance without overly restricting the sample size.

22 **Q. Did Mr. Muldoon consider the projected capitalization ratios of the potential**  
23 **proxy group companies?**



1 A. Mr. Muldoon's testimony and workpapers are not clear in this regard. While  
2 Mr. Muldoon has relied on Value Line's projection of the long-term debt ratio for  
3 each company as of 2022, it is not readily apparent if Mr. Muldoon has considered  
4 the long-term debt ratio estimates provided by Value Line for 2023 and 2025–2027.  
5 For example, Mr. Muldoon has included Eversource Energy (ES) in his proxy even  
6 though the company had a long-term debt ratio of 55.50 percent which exceeded the  
7 high-end of Mr. Muldoon's criteria of 55 percent. Considering the Value Line report  
8 dated February 11, 2022 for ES that Mr. Muldoon relied on for his analysis, it would  
9 appear that Value Line is projecting that ES will increase its long-term debt ratio from  
10 55.5 percent to 57.0 percent by 2025–2027. Given the expected increase in ES's  
11 long-term debt ratio, it is reasonable to conclude that ES should have been excluded  
12 from Mr. Muldoon's proxy group. Moreover, consideration of Value Line's forecast  
13 for 2025–27 is reasonable particularly because Mr. Muldoon has relied on the  
14 dividend forecasts provided by Value Line for the same time period in his Multi-  
15 Stage and Single-Stage DCF analyses. Further, this example highlights the increased  
16 level of subjectivity that must be applied when relying on the long-term debt ratios  
17 projected by Value Line.

18 **Q. Are there companies that are unnecessarily eliminated from the proxy group**  
19 **based on Mr. Muldoon's capitalization ratio screen?**

20 A. Yes. As shown in **Figure 12** below, there are eight companies that were included in  
21 my proxy group that did not meet Mr. Muldoon's long-term debt ratio screen. Of  
22 those eight companies, four companies (CMS Energy Corporation, Entergy  
23 Corporation, Southern Company and Xcel Energy, Inc.) met each of the remaining

1 screens applied by Mr. Muldoon and thus were only excluded due to his long-term  
 2 debt ratio screen. Given the number of companies excluded due to the long-term debt  
 3 ratio screen, I believe the screen is overly restrictive. The use of a long-term debt  
 4 ratio screen is even less relevant considering that Mr. Muldoon, ultimately, adjusts his  
 5 Multi-Stage DCF results using the Hamada equation. While I do not agree with his  
 6 specific adjustment, and address this separately in my reply testimony, the Hamada  
 7 equation specifically accounts for differences in financial risk as a result of capital  
 8 structure between the subject and proxy group companies. Therefore, the additional  
 9 use of a long-term debt ratio screen is unnecessary and overly restricts the proxy  
 10 group.

11 **Figure 12: Proxy Companies Excluded by Mr. Muldoon based on the Capitalization**

12 **Ratio Screen**

<b>Company</b>
ALLETE, Inc.
American Electric Power Company, Inc.
CMS Energy Corporation
Entergy Corporation
NextEra Energy, Inc.
Otter Tail Corporation
Southern Company
Xcel Energy Inc.

1                   **5.       Generation Ownership Screening Criterion**

2   **Q.    Do you have any other concerns with the screening criteria relied on by**  
3           **Mr. Muldoon to develop his proxy group for PacifiCorp?**

4   A.    Yes, I do. Mr. Muldoon has not applied a screen to ensure the companies included in  
5           his proxy group: 1) own generation and 2) own coal-fired power plants. In fact,  
6           Mr. Muldoon notes that he saw my thermal generation fuel mix screen as “largely a  
7           distraction”.<sup>68</sup>

8   **Q.    Please explain your generation ownership screens.**

9   A.    I have selected companies that own regulated generation assets because they have a  
10          different risk profile than companies that do not own generation (i.e., transmission  
11          and distribution (T&D) only utilities). Furthermore, in order to increase the risk  
12          comparability to PacifiCorp in Oregon, I have applied an additional screen based on  
13          the percentage of coal-fired generation. Mr. Muldoon, on the other hand, has not  
14          applied a generation screen, and has therefore included companies that own very  
15          limited regulated generation. In particular, Mr. Muldoon’s proxy group includes  
16          Consolidated Edison, Inc. and ES, both of which own very limited regulated  
17          generation assets and therefore are not risk comparable to PacifiCorp.

18   **Q.    What evidence is there that investors consider companies that own generation**  
19          **facilities to have higher risk than T&D utilities?**

20   A.    The generation function is generally regarded by investors as being higher risk than  
21          electric transmission or distribution. As stated by Moody’s in its 2017 ratings  
22          methodology for regulated electric and gas utilities:

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<sup>68</sup> Staff/100, Muldoon/25.

1 Generation utilities and vertically integrated utilities generally  
2 have a higher level of business risk because they are engaged in  
3 power generation, so we apply the Standard Grid. We view  
4 power generation as the highest-risk component of the electric  
5 utility business, as generation plants are typically the most  
6 expensive part of a utility's infrastructure (representing asset  
7 concentration risk) and are subject to the greatest risks in both  
8 construction and operation, including the risk that incurred costs  
9 will either not be recovered in rates or recovered with material  
10 delays.<sup>69</sup>

11 **6. Conclusion**

12 **Q. What is your conclusion regarding Mr. Muldoon's proxy group in this**  
13 **proceeding?**

14 A. While I believe it was Mr. Muldoon intention to identify risk-comparable companies  
15 using his criteria, based on the following five reasons, I conclude that the proxy group  
16 developed by Mr. Muldoon is not comparable to PacifiCorp and therefore should not  
17 be considered by the Commission in setting the ROE for the Company:

- 18 1. Mr. Muldoon's "heavily regulated electric utility revenue" screen: 1) is not  
19 applied to achieve a proxy group based on electric utility revenue and includes  
20 companies that have significant natural gas operations; and 2) as in the example  
21 for ALE, does not appear to match the data source (i.e., Form 10-K) that  
22 Mr. Muldoon notes is the source of his regulated revenue calculation.
- 23 2. Mr. Muldoon's M&A screen inappropriately excludes companies: 1) based on  
24 transactions that closed or were terminated up to five years ago which clearly  
25 would not have any effect on the three days of market data Mr. Muldoon relied  
26 on to calculate his DCF and CAPM analyses; and 2) excludes companies such  
27 as AEP which had smaller transactions that would not be considered

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<sup>69</sup> Moody's Investors Service, Rating Methodology: Regulated Electric and Gas Utilities, at 21.

1 transformative, and 3) fails to exclude companies that did experience significant  
2 unsustainable changes to market data, specifically PNW.

3 3. Mr. Muldoon's credit rating screen is overly restrictive and results in the  
4 exclusion of companies that would be considered comparable to PacifiCorp. He  
5 has provided no evidence that investors would not consider comparable a  
6 company with an investment grade credit rating that is more than two notches  
7 from the subject company's credit rating.

8 4. Mr. Muldoon's long-term debt ratio screen is not appropriate because: 1) he has  
9 applied a credit rating screen which also considers financial risk; and 2) he  
10 applies the Hamada adjustment to his DCF results to account for any difference  
11 in financial risk between PacifiCorp and the proxy group.

12 5. Mr. Muldoon fails to consider a key risk factor that has been identified by  
13 investors and credit rating agencies, generation ownership. This results in the  
14 inclusion of two companies that own minimal generation and therefore are not  
15 comparable to PacifiCorp, a vertically integrated utility.

16 **Q. What proxy group does AWEC/CUB witness Mr. Gorman rely on to determine**  
17 **his recommended ROE for PacifiCorp?**

18 A. Mr. Gorman relies on the same proxy group as I have in my direct testimony to  
19 develop his recommended ROE for the Company.<sup>70</sup>

20 **Q. What can you conclude from Mr. Gorman's reliance on your proxy group?**

21 A. It is reasonable to conclude that Mr. Gorman did not disagree substantially with the  
22 screening criteria relied upon to establish the group. Further, it is reasonable to

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<sup>70</sup> AWEC-CUB/100, Gorman/30.

1 conclude that Mr. Gorman agrees that this proxy group is reasonably risk-comparable  
2 to PacifiCorp.

3 **B. Multi-Stage DCF Analysis**

4 **1. Reasonableness of Mr. Muldoon's Multi-Stage DCF Results**

5 **Q. Are the ROE estimates produced by Mr. Muldoon's Multi-Stage DCF model**  
6 **reasonable compared to the returns available to investors in companies with**  
7 **similar risk?**

8 A. No. The ROE range selected by Mr. Muldoon from his Multi-Stage DCF analysis is  
9 8.95 percent to 9.38 percent, with a midpoint of approximately 9.20 percent. The low  
10 end of this range of results is 70 basis points below the average of comparable  
11 authorized ROEs for vertically integrated electric utilities since 2019 of 9.65 percent,  
12 and Mr. Muldoon's ROE recommendation is 45 basis points lower than the average  
13 authorized return over that period. Only three of 77 decisions for vertically integrated  
14 electric utilities have authorized an ROE of 9.20 percent or less since January 2019.<sup>71</sup>  
15 The *Hope* and *Bluefield* decisions require the authorized return to be just and  
16 reasonable, as well as comparable to other returns available to investors in companies  
17 with similar risk. Mr. Muldoon's Multi-Stage DCF results clearly violate this  
18 standard.

19 **2. Share Prices**

20 **Q. What time period is covered by Mr. Muldoon's Multi-Stage DCF analysis?**

21 A. Mr. Muldoon's Multi-Stage DCF analysis is based on average stock prices for three

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<sup>71</sup> Source: S&P Capital IQ Pro.

1 days; the first trading day of April, May, and June 2022.<sup>72</sup>

2 **Q. Do you agree with the time-period Mr. Muldoon has chosen for his DCF**  
3 **analysis?**

4 A. No, I do not. Mr. Muldoon's approach of relying on three individual days to establish  
5 the average price for the proxy companies is an insufficient time period to minimize  
6 the effect of market volatility. It is more effective to rely on longer averaging  
7 periods, such as was relied upon in my analysis and that of Mr. Gorman to minimize  
8 the effect of day-to-day movements in stock prices. For example, in my direct  
9 testimony, I have relied on 30-, 90- and 180-day averaging periods. Similarly,  
10 AWEC/CUB witness Mr. Gorman uses 13-week average stock prices as of April 14,  
11 2022, in his DCF analyses.

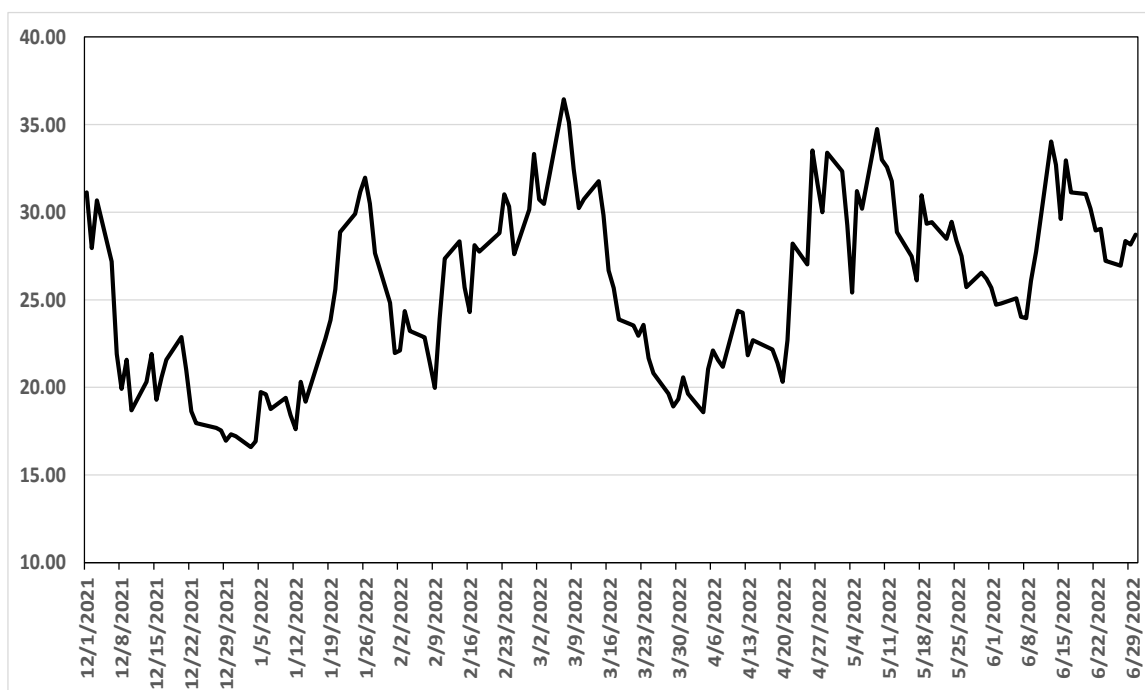
12 Furthermore, as discussed in Section IV above, the use of average stock prices  
13 in the DCF model is particularly important given current market conditions. The  
14 Federal Reserve is normalizing monetary policy in response to sustained increase  
15 levels of inflation due to supply constraints as a result of the COVID-19 pandemic  
16 and the conflict between Russia and Ukraine. This creates uncertainty in the market  
17 regarding the pace of the policy normalization and the effect of the Federal Reserve's  
18 policy normalization on the economy and inflation. As shown in **Figure 13** below,  
19 Chicago Board Options Exchange (CBOE) Volatility Index (VIX) has varied  
20 significantly since December 2021 when the Federal Reserve announced that the  
21 process of normalizing monetary policy would be accelerated to respond to inflation.  
22 Since that time investors have responded to both positive and negative developments

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<sup>72</sup> Staff/100, Muldoon/35.

1 regarding the effect of inflation, the effect of the Federal Reserve’s policy on the  
 2 economy as well as the global economic effects of the war in Ukraine. The use of  
 3 average closing prices on the first trading day of three months subjects any analysis to  
 4 over or understating the ROE based on the relative position of the market on the three  
 5 dates that the underlying data was accessed.

6 **Figure 13: CBOE VIX – December 2021 to June 2022<sup>73</sup>**



7 For example, Ameren Corporation’s adjusted close stock price ranged from  
 8 \$81.39 to \$97.89 over the period of April 1, 2022 through June 30, 2022. Similar  
 9 short-term stock price changes can be seen with the other proxy group members.  
 10 Therefore, the average of a small number of data points could bias the average over  
 11 this time period, depending on the individual days chosen. This issue can become  
 12 even more pronounced when there are significant market events (e.g., immediately

<sup>73</sup> Chicago Board Options Exchange, CBOE Volatility Index: VIX [VIXCLS], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/VIXCLS>, June 30, 2022.



1 prior to and after the stock market crash in 2007 due to the financial crisis and  
2 immediately prior to and after the stock market crash in March 2020 that occurred  
3 due to the economic effects of COVID-19).

4 Thus, Mr. Muldoon's approach is prone to error by relying on a dataset that is  
5 too narrow and susceptible to short-term variations that are not representative of  
6 longer-term market conditions. It is for this reason that most analysts and  
7 Commissions rely on an average of utility stock prices over some time period to  
8 ensure that one or two unusual data points cannot bias the results of the analysis.

### 9 3. Short-term and Long-Term Growth Rate Assumptions

10 **Q. Please summarize the differences in the assumptions relied on in your**  
11 **application of the Multi-Stage DCF model and the model developed by**  
12 **Mr. Muldoon.**

13 A. The Multi-Stage DCF models that Mr. Muldoon and I have relied on are generally  
14 similar in structure; we both use a three-stage model that relies on near-term growth  
15 in the first five-year period, transitional growth rates for the second stage (years six–  
16 10), and a long-term growth rate in year 11 and beyond. The primary difference in  
17 our analyses is the appropriate near-term and long-term growth rate used in the first  
18 and third stages of the model. Mr. Muldoon uses dividend and earnings growth rates  
19 from Value Line in the first stage, while I have used earnings growth rates from  
20 Value Line, Thomson First Call and Zacks Investment Service. For the long-term  
21 growth rate, Mr. Muldoon relies on multiple sources for a nominal GDP growth rate  
22 ranging from 4.00 percent to 4.95 percent<sup>74</sup>, while I have used a GDP growth rate of

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<sup>74</sup> Staff/100, Muldoon/31-32.

1 5.49 percent based on historical real GDP growth and projected inflation.

2 **Q. Why have you used earnings growth rates rather than dividend growth rates in**  
3 **the first stage of your Multi-Stage DCF analysis?**

4 A. As explained in my direct testimony, I used EPS growth rates based on equity  
5 analysts' forecasts because dividend growth ultimately can only be sustained by  
6 earnings growth.<sup>75</sup> As noted by Brigham and Houston:

7 Growth in dividends occurs primarily as a result of growth in  
8 earnings per share (EPS). Earnings growth, in turn, results from a  
9 number of factors, including (1) inflation, (2) the amount of earnings  
10 the company retains and invests, and (3) the rate of return the  
11 company earns on its equity (ROE).<sup>76</sup>

12 In contrast, changes in a company's dividend payments are based on  
13 management decisions related to cash management and other factors. For example, a  
14 company may decide to retain certain earnings rather than include those earnings in a  
15 dividend issuance. Therefore, dividend growth rates are less likely than earnings  
16 growth rates to reflect investor perceptions of a company's growth prospects.  
17 Furthermore, investment analysts report predominant reliance on EPS growth  
18 projections. In a survey completed by 297 members of the Association for  
19 Investment Management and Research, the majority of respondents ranked earnings  
20 as the most important variable in valuing a security (more important than cash flow,  
21 dividends, or book value).<sup>77</sup>

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<sup>75</sup> PAC/300, Bulkley/34.

<sup>76</sup> Eugene F. Brigham and Joel F. Houston, *Fundamentals of Financial Management*, at 317 (Concise Fourth Edition, Thomson South-Western, 2004).

<sup>77</sup> Stanley B. Block, *A Study of Financial Analysts: Practice and Theory*, *Financial Analysts Journal* (July/August 1999).

1 Academic research also supports the use of EPS growth estimates in the DCF  
2 model. A 2002 study in the *Journal of Accounting Research*, examined “the  
3 valuation performance of a comprehensive list of value drivers” and found that  
4 “forward earnings explain stock prices remarkably well” and were generally superior  
5 to other value drivers analyzed.<sup>78</sup> A 2012 study from the journal *Contemporary*  
6 *Accounting Research* found that the sell-side analysts with the most accurate stock  
7 price targets were those whom the researchers found to have more accurate earnings  
8 forecasts.<sup>79</sup> This conclusion is consistent with the findings of Professors Jung, Shane  
9 and Yang who concluded in their 2012 article in the *Journal of Accounting and*  
10 *Finance* that investors respond more strongly to the recommendations of analysts  
11 who publish long-term earnings growth projections. Specifically, the results of the  
12 study indicated that:

13 We speculate that publication of LTG forecasts signals effective  
14 analyst investment in a process that provides the analyst with a  
15 valuable long-term perspective of firms’ prospects, and more so in  
16 the post-Reg. FD period when analysts have a more level playing  
17 field. We document robust results consistent with this conjecture.  
18 We find that stock recommendations accompanied by LTG forecasts  
19 elicit a stronger market reaction than recommendations  
20 unaccompanied by LTG forecasts. In addition, analysts publishing  
21 LTG forecasts are less likely to leave the profession or be demoted  
22 from large to smaller brokerage houses. Finally, post-Reg. FD  
23 observations drive most of our results.

24 Since we also find no evidence of market under- or overreaction to  
25 stock recommendation revisions accompanied by LTG forecasts, we  
26 conclude that publication of LTG forecasts plays a meaningful role

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<sup>78</sup> Jing Liu, et al., *Equity Valuation Using Multiples*, Journal of Accounting Research, Vol. 40 No. 1, March 2002.

<sup>79</sup> C.A. Gleason, et al., *Valuation Model Use and the Price Target Performance of Sell-Side Equity Analysts*, Contemporary Accounting Research.

1 in promoting price discovery and efficient allocation of resources in  
2 capital markets.<sup>80</sup>

3 **Q. Please provide a recent example where a short-run management decision has**  
4 **affected dividends.**

5 A. There were a number of companies that suspended dividend payments as a result of  
6 the increased uncertainty due to COVID-19. For example, more than 40 S&P 500  
7 companies temporarily suspended their dividends in 2020 due to COVID-19.<sup>81</sup> These  
8 dividend suspensions occurred because companies believed earnings over the short-  
9 term would decline and, therefore, elected to conserve cash to offset the financial  
10 effects of COVID-19. This decision will affect the dividends and the payout ratio in  
11 the short-term but is not necessarily indicative of a firm's long-term earnings growth.

12 **Q. Do you have any other concerns with Mr. Muldoon's use of dividend growth**  
13 **rates in the first stage of his Multi-Stage DCF analysis?**

14 A. Yes. Value Line is the only source of dividend growth rates of which I am aware.  
15 Mr. Muldoon's reliance on dividend growth rates from Value Line is a concern  
16 because those dividend growth rates are based on the views of a single analyst,  
17 whereas the EPS growth rates from Thomson First Call and Zacks Investment  
18 Research are consensus estimates based on the average EPS growth rates from  
19 multiple analysts.

20 **Q. What GDP growth rates does Mr. Muldoon use in his Multi-Stage DCF model?**

21 A. As shown in Table 7 of Mr. Muldoon's opening testimony, Mr. Muldoon uses four

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<sup>80</sup> Boochun Jung, et. al., *Do financial analysts' long-term growth forecasts matter? Evidence from stock recommendations and career outcomes*, Journal of Accounting and Economics, Vol. 53 Issues 1-2, February-April 2012.

<sup>81</sup> Karen Langley, *U.S. Companies Slashed Dividends at Fastest Pace in More Than a Decade*, Wall Street Journal (July 8, 2020).

1 different sources of GDP growth in his Multi-Stage DCF model: 1) a blended growth  
2 rate of 4.62 percent based on 50.0 percent weight given to the Bureau of Economic  
3 Analysis (BEA) nominal historical GDP growth rate of 4.95 percent and 12.5 percent  
4 weight to the following sources of projected GDP: Energy Information  
5 Administration; PricewaterhouseCoopers; Social Security Administration; and  
6 Congressional Budget Office (CBO); 2) a projected growth rate of 4.00 percent based  
7 on the CBO long-term 20-year budget outlook; 3) a growth rate of 4.95 percent based  
8 on the BEA nominal historical GDP growth rate; and 4) my long-term GDP growth  
9 rate of 5.49 percent.

10 **Q. Please comment on the various GDP growth rates Mr. Muldoon uses in his**  
11 **Multi-Stage DCF model.**

12 A. As a practical matter, none of the GDP growth rates used by Mr. Muldoon with the  
13 exception of my GDP growth rate of 5.49 percent produce ROE results that are  
14 consistent with the average of comparable authorized returns of 9.65 percent for  
15 vertically integrated electric utilities in other jurisdictions across the country since  
16 2019. However, it should be noted that while Mr. Muldoon estimates a scenario of  
17 his Multi-Stage DCF model using my GDP growth rate, he does not rely on these  
18 results in the determination of the ROE for PacifiCorp because he concludes that my  
19 GDP growth rate is “excessive”.

20 Furthermore, while Mr. Muldoon estimates his Multi-Stage DCF model using  
21 the projected and blended GDP growth rates of 4.00 percent and 4.62 percent,  
22 respectively, he does not rely on these results when determining his range of  
23 reasonable ROEs for PacifiCorp of 8.95 percent to 9.38 percent.

1 Mr. Muldoon appears to rely solely on the results of his Multi-Stage DCF  
2 model using his historical GDP growth rate of 4.95 percent to develop his range of  
3 reasonable ROEs and ROE recommendation for PacifiCorp. For example, the lower  
4 boundary of Mr. Muldoon's range of 8.95 percent is calculated based on his proxy  
5 group and historical GDP growth rate of 4.95 percent, which produces a Multi-Stage  
6 DCF result of 8.51 percent, which Mr. Muldoon then adjusts for leverage using the  
7 Hamada-equation to a return of 8.82 percent, plus flotation costs of 12.5 basis points  
8 to arrive at the 8.95 percent return. Similarly, the upper boundary of Mr. Muldoon's  
9 range of 9.38 percent is calculated based on my proxy group and his historical GDP  
10 growth rate, which produces a Multi-Stage DCF result of 8.75 percent, which Mr.  
11 Muldoon then adjusts for leverage using the Hamada-equation to a return of 9.26  
12 percent, plus flotation costs of 12.5 basis points to arrive at the 9.38 percent return.

13 **Q. Has Mr. Muldoon relied on your GDP growth rate to develop his range of**  
14 **reasonableness in a prior proceeding?**

15 A. Yes, he has. In docket UE 374 for PacifiCorp, Mr. Muldoon relied on my GDP  
16 growth rate methodology and calculation in his Multi-Stage DCF analysis to establish  
17 the upper boundary of his range of reasonable ROEs of 9.39 percent.<sup>82</sup> This is  
18 inconsistent with his position in the current proceeding where he disregards his Multi-  
19 Stage DCF results using my GDP growth rate because he concludes that my growth  
20 rate is "excessive".<sup>83</sup>

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<sup>82</sup> *In the matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision*, Docket No. UE 374, Staff/205 Muldoon-Enright /1 (June 4, 2020).

<sup>83</sup> Staff/104, Muldoon/1.

1 **Q. Please explain why you say Mr. Muldoon is inconsistent in his opinion about**  
2 **your estimated GDP growth rate.**

3 A. As discussed previously, Mr. Muldoon relied upon my GDP growth rate to set his  
4 range in the Company's last case. In docket UE 374, that GDP growth rate was  
5 5.53 percent. In the current case, my estimate of a GDP growth is 5.49 percent which  
6 is lower than the estimate he actively accepted and relied upon in the Company's last  
7 proceeding. It is unreasonable for Mr. Muldoon to conclude today that my GDP  
8 growth rates is "excessive," when he actively relied on my methodology and the  
9 resulting (higher) estimate in the last proceeding.

10 **Q. How would Mr. Muldoon's range have changed if he had used the result of his**  
11 **Multi-Stage DCF model that relies on your GDP growth rate to set the high end**  
12 **of his range in this proceeding, as he did in the Company's last rate proceeding?**

13 A. The upper end of Mr. Muldoon's range would have increased from 9.38 percent to  
14 9.80 percent.

15 **4. Hamada Equation**

16 **Q. Do you agree with the Hamada equation Mr. Muldoon used to adjust the return**  
17 **produced by the Multi-Stage DCF model for differences in leverage between**  
18 **PacifiCorp and the proxy group companies?**

19 A. No, I do not. Specifically, I disagree with the equity risk premium that Mr. Muldoon  
20 relied on to calculate the Hamada adjustment. Mr. Muldoon relied on an equity risk  
21 premium of 4.50 percent which he notes is based on the historical market risk  
22 premium calculated by Ibbotson.

1 **Q. Please explain your disagreement with the equity risk premium used in**  
2 **Mr. Muldoon's Hamada equation.**

3 A. There are several reasons why I disagree with the equity risk premium used in  
4 Mr. Muldoon's Hamada equation. First, the equity risk premium relied on by  
5 Mr. Muldoon in the Hamada equation is inconsistent with the equity risk premium he  
6 uses in his CAPM. Mr. Muldoon has relied on the historical risk premium as  
7 estimated by Ibbotson of 4.50 percent in his Hamada equation but an equity risk  
8 premium of 7.85 percent in his CAPM analysis. While I will discuss in more detail  
9 below why I disagree with Mr. Muldoon's calculation of the risk premium of  
10 7.85 percent in his CAPM, he should have been consistent and also relied on a risk  
11 premium of 7.85 percent in his Hamada equation. Mr. Muldoon provides no  
12 explanation as to why he assumed a different risk premium for the Hamada equation  
13 than the CAPM.

14 Second, I disagree with the use of the historical market risk premium because  
15 it fails to consider the inverse relationship between interest rates and the market risk  
16 premium. As shown in my Bond Yield plus Risk Premium analysis, as interest rates  
17 decrease, the market risk premium increases. Lastly, it is not clear what time period  
18 Mr. Muldoon used to estimate the historical risk premium from Ibbotson; however,  
19 Mr. Muldoon's calculation does not appear to incorporate recent data since his risk  
20 premium estimate has not changed from the historical risk premium he reported in his  
21 opening testimony in PacifiCorp's last rate case, docket UE 374, in June 2020.<sup>84</sup>

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<sup>84</sup> *In the matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision, Docket No. UE 374, Staff/205 Muldoon, Enright /1 (June 4, 2020).*



1                   **5. Adjustments to Mr. Muldoon’s Multi-Stage DCF Analysis**

2   **Q. Have you adjusted Mr. Muldoon’s Multi-Stage DCF analysis?**

3   A. Yes, I have. I adjusted and updated Muldoon’s Multi-Stage DCF analysis to reflect  
4   the following:

5           1. Rely on Mr. Muldoon’s “Model Y” which assumes the sale of the stock at year  
6           30 and calculates the sale price based on a P/E ratio and projected EPS. It is  
7           this version of his Multi-Stage DCF that considers earnings growth projections  
8           from Value Line.

9           2. Rely only on the results of his Multi-Stage DCF model using the proxy group  
10          that I rely on in my direct testimony.

11          3. Include the most current Value Line data<sup>85</sup> (i.e., dividends per share, EPS, etc.)  
12          and more recent stock price data (first trading day of May, June and July 2022).

13          4. Update the Hamada adjustment to include the most current Value Line data  
14          (i.e., beta coefficients, income tax rates, etc.), rely on the equity risk premium  
15          of 7.85 percent that Mr. Muldoon used in his CAPM analysis and rely on the  
16          Company’s proposed equity ratio of 52.25 percent as opposed to  
17          Mr. Muldoon’s proposed equity ratio of 50.00 percent.

18          5. Develop the range of reasonable ROEs for PacifiCorp based on the Multi-Stage  
19          DCF results using Mr. Muldoon’s historical GDP growth rate of 4.95 percent  
20          and my GDP growth rate of 5.49 percent which Mr. Muldoon considered in  
21          PacifiCorp’s last rate case, docket UE 374.

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<sup>85</sup> Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022.

1 As shown in Figure 14, (see also Exhibit PAC/1402), as a result of these  
 2 updates and reasonable adjustments, the results of Mr. Muldoon’s Multi-Stage DCF  
 3 analysis increase to a range of 9.80 percent to 10.22 percent, with an approximate  
 4 midpoint of 10.0 percent.

5 **Figure 14: Summary of Adjustments to Mr. Muldoon’s Multi-Stage DCF Analysis**<sup>86</sup>

	Midpoint	ROE Range
As Filed	9.2%	8.95% - 9.38%
Adjusted Multi-Stage DCF Results	10.0%	9.80% - 10.22%

6 **Q. Please summarize your conclusions regarding Mr. Muldoon’s Multi-Stage DCF**  
 7 **analysis.**

8 A. My primary conclusions are as follows:

- 9 1. Mr. Muldoon estimates his Multi-Stage DCF model using a projected GDP  
 10 growth rate, a blended GDP growth rate, a historical GDP growth rate and my  
 11 GDP growth rate. However, the results of his Multi-Stage DCF model relying  
 12 on his projected and blended GDP growth rates are well below the nationwide  
 13 average ROE for vertically integrated electric utilities since 2019 and therefore  
 14 are not reasonable. It appears Mr. Muldoon agrees as he has not relied on these  
 15 results when developing his range of reasonable ROEs for PacifiCorp.
- 16 2. While Mr. Muldoon calculates his Multi-Stage DCF model using my GDP  
 17 growth rate, he disregards the results because he concludes that my GDP growth

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<sup>86</sup> Multi-Stage DCF results include Hamada and Flotation Cost Adjustments.

1 rate of 5.49 percent is “excessive”. However, his conclusion is in direct conflict  
2 with his position in PacifiCorp’s last rate case, docket UE 374, where he  
3 developed the high end of his range of reasonable ROEs using my GDP growth  
4 rate of 5.53 percent which is greater than the 5.49 percent GDP growth rate that  
5 I relied on in the current proceeding.

6 3. Ultimately, Mr. Muldoon relies on the results of his Multi-Stage DCF model  
7 calculated using his historical GDP growth rate of 4.95 percent. This results in  
8 a range of reasonable ROEs (after the Hamada and Flotations cost adjustments  
9 are applied) of 8.95 percent to 9.38 percent. However, even the high end of Mr.  
10 Muldoon’s range of results is 27 basis points lower than the national average  
11 for integrated electric utilities and does not take into consideration the fact that  
12 PacifiCorp has higher overall business risk than the proxy group due to the  
13 sharing band on the fuel cost adjustment mechanism, and the absence of  
14 revenue decoupling.

15 4. Reasonable updates and adjustments to Mr. Muldoon’s analysis to reflect more  
16 recent market data, rely only on the risk comparable proxy group agreed to by  
17 myself and Mr. Gorman, consistent consideration of my GDP growth rate, and  
18 making Mr. Muldoon’s equity risk premium in the Hamada equation consistent  
19 with the equity risk premium used in his the CAPM, the midpoint of Mr.  
20 Muldoon’s Multi-Stage DCF model increases by approximately 80 basis points  
21 from 9.20 percent to 10.0 percent.

1                   **6. Reliance on Multi-Stage DCF Model**

2   **Q. What do you conclude about the results of the DCF model under current market**  
3   **conditions?**

4   A. As discussed in Section IV, interest rates have increased significantly over the past  
5   several months and investors expect interest rates to continue to increase over the  
6   near-term as the Federal Reserve accelerates the process of monetary policy  
7   normalization in response to increased levels of inflation not seen in approximately  
8   40 years. The share prices of utility stocks are inversely correlated to interest rates,  
9   and thus investors expect the utility sector to underperform over the near-term. This  
10   suggests that the cost of equity will be increasing over the near-term and thus, current  
11   estimates of the DCF model are likely understating the forward-looking cost of equity  
12   for PacifiCorp. Therefore, Mr. Muldoon's ROE recommendation of 9.20 percent  
13   based solely on the results of his Multi-Stage DCF analysis is most likely  
14   understating investors' return requirements over the period that PacifiCorp's rates  
15   will be in effect. Moreover, current and prospective market conditions support  
16   consideration of other ROE estimation models such as the CAPM, and Risk Premium,  
17   which may better reflect expected market conditions during the period that  
18   PacifiCorp's rates will be in effect.

19   **Q. Has the Commission noted that it is important to recognize the results of**  
20   **multiple ROE estimation models?**

21   A. Yes. As discussed in my direct testimony, while the Commission has generally relied  
22   on the Multi-Stage DCF model, while using the Single-Stage DCF and the CAPM  
23   methodologies to test the reasonableness of the Multi-Stage DCF results, the

1 Commission has previously considered the results of many ROE estimation models  
2 and determined, based on the results of those models, whether or not to place any  
3 weight on the model in its final determination.<sup>87</sup>

4 **C. Alternative ROE Methodologies**

5 **Q. Does Mr. Muldoon use any alternative ROE methodologies to test the**  
6 **reasonableness of the Multi-Stage DCF model results?**

7 A. Yes. Mr. Muldoon has considered alternative ROE methodologies, such as the  
8 Constant Growth DCF model and the CAPM analysis to test the reasonableness of his  
9 Multi-Stage DCF model results.<sup>88</sup> However, Mr. Muldoon has not placed any weight  
10 on the results of these alternative methodologies in establishing his range of results or  
11 his ROE recommendation.

12 **Q. Why do you believe it is important to place weight on the results of multiple**  
13 **methodologies?**

14 A. As explained in my direct testimony, investors consider the results of multiple  
15 methodologies in order to inform their view of the cost of equity, including the DCF  
16 model, the CAPM, and the risk premium analysis.<sup>89</sup> This is particularly important  
17 because each ROE estimation model has its own strengths and shortcomings. When  
18 the results of one model cannot be corroborated by the results of alternative models, it  
19 is reasonable and appropriate to consider the individual and collective results of  
20 multiple methods to establish the return on equity.

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<sup>87</sup> PAC/300, Bulkley/31-32.

<sup>88</sup> Staff/100, Muldoon/23.

<sup>89</sup> PAC/300, Bulkley/30-42.

1                   **1.       Constant Growth DCF**

2   **Q.     Why is it reasonable to use the Constant Growth DCF model to estimate the cost**  
3       **of equity for regulated utilities?**

4   A.    As discussed in my direct testimony, one of the assumptions of the Constant Growth  
5       DCF model is a constant growth rate for earnings and dividends in perpetuity.<sup>90</sup>  
6       Regulated utilities are in a mature industry and therefore the growth rates for this  
7       industry are not likely to be as volatile as start-up companies, or companies that  
8       experience greater volatility in the competitive market. Therefore, it is a reasonable  
9       to rely on the Constant Growth DCF. In fact, the Constant Growth model was  
10      developed by Professor Myron Gordon in the 1960s for the purpose of estimating the  
11      cost of equity for companies that pay dividends, that have steady growth rates and  
12      which operate in mature industries. The Multi-Stage DCF model was developed  
13      later, as a variation on the Constant Growth DCF model, in order to allow for the  
14      possibility that the near-term growth rate for a company would change over the  
15      longer term. However, for regulated utilities, the near term growth rate is generally  
16      sustainable over the longer term because these are mature companies with relatively  
17      stable demand. My current concern with the DCF model (both Constant Growth and  
18      Multi-Stage) is that given the inverse relationship between utility share prices and  
19      interests rates and the expectation that interest rates will increase as the Federal  
20      Reserve normalizes monetary policy, the DCF model is currently understating the  
21      cost of equity over the near-term or the period that PacifiCorp's rates will be in effect.

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<sup>90</sup> PAC/300, Bulkley/33.

1 **Q. Do you agree with Mr. Muldoon's specification of the Constant Growth DCF**  
2 **model?**

3 A. No. There are two primary issues with Mr. Muldoon's Constant Growth DCF model.  
4 First, similar to his Multi-Stage DCF model, Mr. Muldoon relies on the average stock  
5 prices for the first trading day of April, May, and June 2022. Similar to Mr. Gorman  
6 and myself, Mr. Muldoon should have relied on average share prices over a specified  
7 time period such as 30-days trading days rather than a limited three-day average,  
8 which can be biased by short-term variations in the market. Second, Mr. Muldoon  
9 has relied solely on projected dividend growth rates provided by Value Line. As I  
10 discussed above, analysts' projected earnings growth rates are the more appropriate  
11 estimate of growth in the Constant Growth DCF model because projected dividend  
12 growth rates are: 1) only sustained by earnings growth; and 2) susceptible to changes  
13 in management decisions which do not reflect the long-term growth prospects of firm.  
14 Moreover, the use of earnings growth is supported by the academic literature.  
15 Finally, Mr. Muldoon's sole reliance on projected dividend growth rates is not  
16 consistent with his specification of the Multi-Stage DCF model where he also  
17 considered projected earnings growth rates from Value Line.

18 **Q. Have you adjusted Mr. Muldoon's Constant Growth DCF analysis?**

19 A. Yes, I have. I adjusted and updated Muldoon's Constant Growth DCF analysis to: 1)  
20 rely only on the results of his Constant Growth DCF model using my proxy group  
21 given the lack of comparability of Mr. Muldoon's proxy group to PacifiCorp; 2)  
22 include the most current Value Line data <sup>91</sup> (i.e., dividends per share, EPS, etc.) and

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<sup>91</sup> Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022.

1 more recent stock price data (first trading day of May, June and July 2022); and 3)  
2 rely on projected EPS growth rates from Value Line, Yahoo! Finance and Zacks  
3 Investment Research in addition to the projected dividend growth rates from Value  
4 Line. As shown in Exhibit PAC/1402, by making reasonable adjustments to  
5 Mr. Muldoon's Constant Growth DCF analysis, his results using my proxy group  
6 increase 60 basis points from 8.80 percent to 9.40 percent.

7 The adjusted DCF result of 9.40 percent is slightly greater than the high-end  
8 of his range of reasonableness of 9.38 percent based on the results of his Multi-Stage  
9 DCF model including the Hamada and Flotation cost adjustments. Furthermore, if  
10 Mr. Muldoon's Hamada (51 basis points for my proxy group) and Flotation cost  
11 (12.5 basis points) adjustments are added to the adjusted Constant Growth DCF  
12 results of 9.40 percent, the resulting ROE is 10.02 percent which is consistent with  
13 my recommended ROE range of 9.90 percent to 10.75 percent and above the  
14 Company's requested ROE of 9.80 percent.

15 **Q. Did Mr. Muldoon apply the Hamada and Flotation cost adjustments to his**  
16 **Constant Growth DCF results?**

17 A. No, he did not. Further, he did not provide an explanation as to why the Hamada and  
18 Flotation cost adjustments were not applied to his Constant Growth DCF results. It  
19 would stand to reason that if Mr. Muldoon determined the adjustments were  
20 appropriate for the Multi-Stage DCF model that each adjustment should also be  
21 applied to the Constant Growth DCF model. By excluding Hamada and Flotation  
22 cost adjustments from his Constant Growth DCF model results it is not reasonable to  
23 compare the results of this analysis with the range he establishes for his Multi-Stage



1 DCF analysis, which includes both adjustments

2 **Q. What is the correct comparison of Mr. Muldoon's Constant Growth and Multi-**  
3 **Stage DCF analyses?**

4 A. In order to compare Mr. Muldoon's Constant Growth DCF results to the range he  
5 establishes from his Multi-Stage DCF analysis, it is necessary to apply both the  
6 Hamada adjustment, of 51 basis points and the flotation cost adjustment of 12.5 basis  
7 points to his Constant Growth DCF results for my proxy group. These adjustments  
8 increase the result for my proxy group from 8.80 percent to 9.47 percent. An ROE of  
9 9.47 percent is greater than the high-end of Mr. Muldoon's range of reasonableness of  
10 9.38 percent and clearly would not support the low-end of 8.95 percent as he  
11 originally concluded.

12 **2. CAPM and Risk Premium**

13 **Q. Please explain why you believe it is also appropriate to place weight on the**  
14 **results of the CAPM and Risk Premium approaches.**

15 A. Risk premium-based models are also commonly used by investors to estimate the cost  
16 of equity. Both the CAPM and Risk Premium approaches rely on a risk-free rate (i.e.,  
17 30-year Treasury bonds) plus a risk premium to compensate investors for the  
18 additional risks associated with owning common equity. Risk premium-based models  
19 provide another view on the cost of equity based on the historical relationship  
20 between risk-free rates and equity returns. In the CAPM, beta is the measure of risk  
21 for a specific company or industry relative to the broad market. Research has shown  
22 that beta tends to understate the expected return for companies such as regulated  
23 utilities that typically have beta coefficients less than 1.0, while overstating the

1 expected return for companies with betas greater than 1.0. The CAPM and Risk  
2 Premium results in my direct testimony indicate that the cost of equity for regulated  
3 electric utilities is higher than the ROE estimates that are being produced by the DCF  
4 models at this time. This conclusion is also supported by the CAPM results  
5 calculated by Mr. Muldoon which are greater than the results produced by his  
6 Constant Growth DCF and Multi-Stage DCF models. This suggests that it is not  
7 appropriate for the Commission to base its decision for PacifiCorp solely on the  
8 results of the Multi-Stage DCF model, when other well-regarded models do not  
9 corroborate the results of the Multi-Stage DCF model.

10 **Q. Do you agree with Mr. Muldoon that his CAPM analysis supports the high-end**  
11 **of his range of reasonableness?**

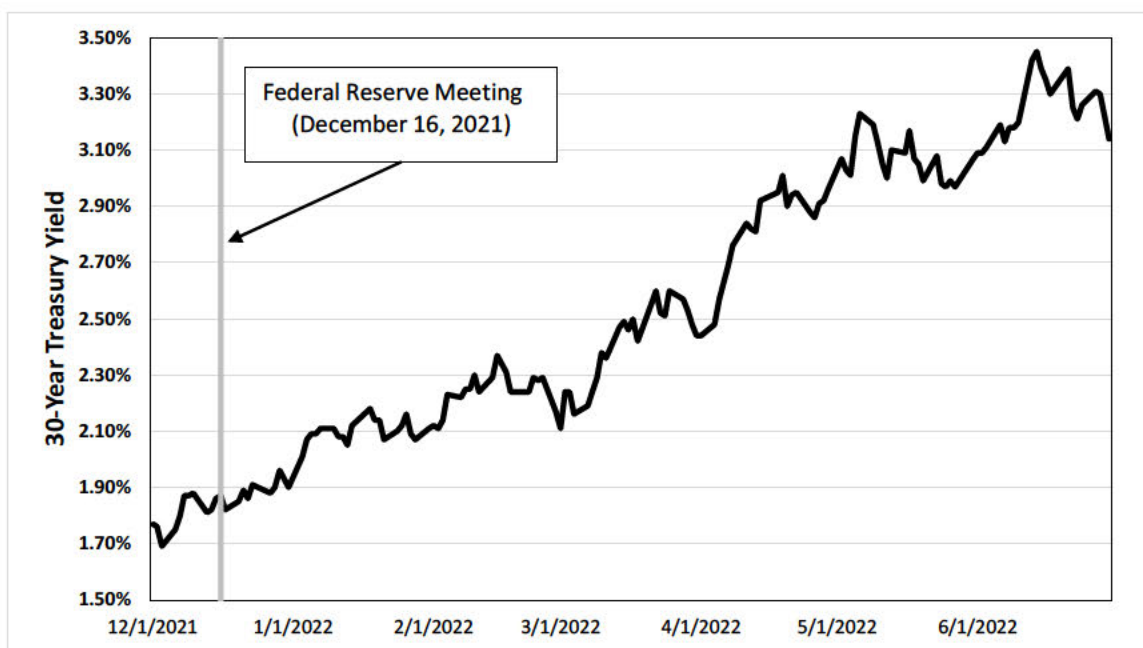
12 A. No, I do not. Mr. Muldoon's CAPM results range from 9.60 percent to 9.80 percent  
13 which are 22 to 42 basis points higher than the high-end of Mr. Muldoon's range of  
14 reasonableness of 9.38 percent. Thus, Mr. Muldoon's CAPM results provide support  
15 for the conclusion that his Multi-Stage DCF model is understating the cost of equity  
16 for PacifiCorp.

17 **Q. Do you agree with the risk-free rate that Mr. Muldoon relies on in his CAPM**  
18 **analysis?**

19 A. No, I do not. First, while Mr. Muldoon indicates that he has relied on the 30-year  
20 Treasury bond yield as of June 3, 2022 of 2.94 percent as his estimate of the risk-free  
21 rate, the yield on the 30-year Treasury bond as of June 3, 2022 was 3.11 percent and  
22 not 2.94 percent. Second, as previously discussed and as shown in **Figure 15** below,  
23 interest rates have increased significantly in the past few months and are expected to

1 continue to increase during the period in which PacifiCorp's rates will be in effect.

2 **Figure 15: Yield on 30 Year Treasury Bond - December 1, 2021, through June 30, 2022**



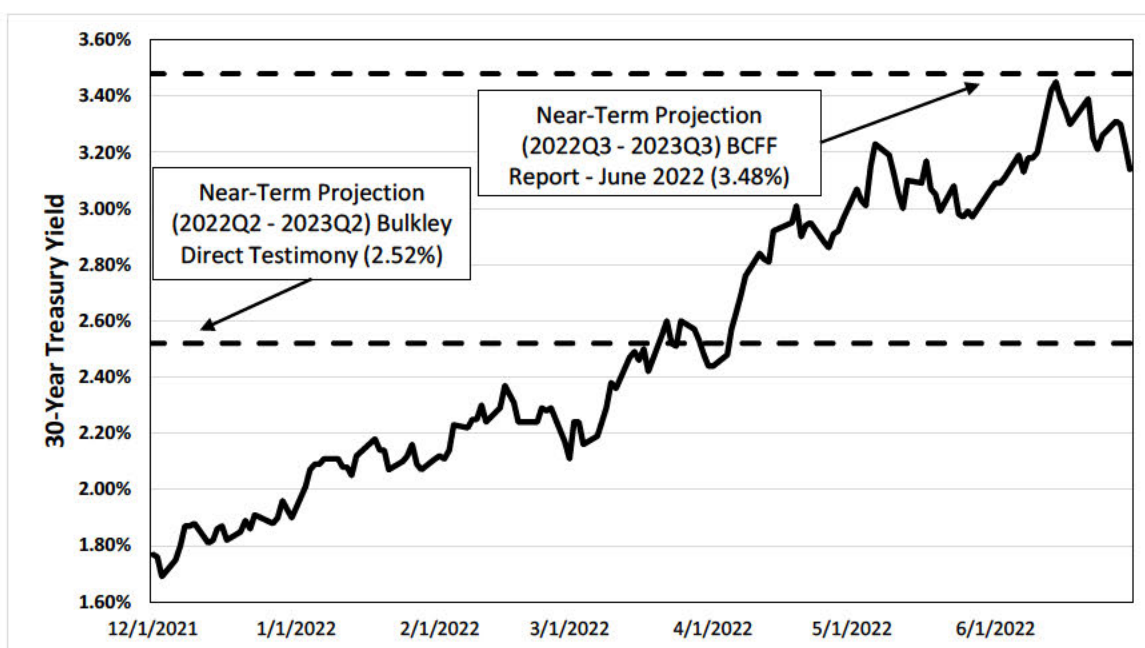
3 The cost of equity is being estimated for the forward-looking period when the  
4 Company's rates will be in effect. Therefore, it is equally important that the risk-free  
5 rate be reflective of the expected risk-free rate during PacifiCorp's rate period, which  
6 is increasing. Thus, it is not reasonable to assume that recent historical market  
7 conditions reflect the market conditions that will exist in the future, and it is more  
8 appropriate to rely on forward-looking interest rates that are expected to prevail  
9 during the period that the Company's rates will be in effect.

10 **Q. Have current interest rates exceeded the near-term interest rate projections that**  
11 **you relied on in your Direct Testimony?**

12 **A.** Yes, they have. As shown in **Figure 16** below, current yields on the 30-year Treasury  
13 Bond are well above the near-term projection (Q2/2022-Q2/2023) of 2.52 percent  
14 published by *Blue Chip Financial Forecasts* that I relied on in my direct testimony

1 and are very close to the near-term projection (Q3/2022-Q3/2023) of 3.48 percent  
 2 also published by *Blue Chip Financial Forecasts* as of June 2022. Therefore,  
 3 considering the recent increases in the yield on the 30-year Treasury bond as a result  
 4 of inflation and the Federal Reserve’s aggressive normalization of monetary policy, it  
 5 appears that the near-term projection published by Blue Chip is currently understating  
 6 future interest rates. This highlights the importance of relying on interest rate  
 7 projections, as the use of current interest rates is likely to vastly understate the interest  
 8 rates that will prevail during the period that PacifiCorp’s rates will be in effect.

9 **Figure 16: Yield on 30 Year Treasury Bond - December 1, 2021, through June 30, 2022**



10 **Q. Have any of the other ROE witnesses relied on projected interest rates as the**  
 11 **estimate of the risk-free rate in the CAPM?**

12 **A.** Yes. Mr. Gorman also relies on the near-term projection of the 30-year Treasury  
 13 bond yield in both his CAPM and Risk Premium models.<sup>92</sup> Therefore, Mr. Muldoon

<sup>92</sup> AWEC-CUB/100, Gorman/49, 57.

1 is the only ROE witness in this proceeding to rely on a historical spot yield of the 30-  
2 year Treasury Bond as the estimate of the risk-free rate.

3 **Q. Do you have any concerns with Mr. Muldoon’s estimate of the market risk**  
4 **premium (MRP)?**

5 A. Yes, I do. As shown in Exhibit Staff/105, Mr. Muldoon calculates the market risk  
6 premium as the difference between the 30-year return on the S&P 500 Index and the  
7 yield on the 30-year Treasury bond yield as of June 3, 2022. While I disagree with  
8 Mr. Muldoon’s selection of the risk-free rate for the reasons I discuss above, my  
9 primary concern with Mr. Muldoon’s MRP is his selection of the market return.

10 First, it is unclear how Mr. Muldoon estimates his 30-year return for the S&P 500  
11 Index as Mr. Muldoon has not provided either a description of the calculation in this  
12 opening testimony or workpaper as to how he arrived at the 10.79 percent return.

13 Second, Mr. Muldoon’s selection of a 30-year period conflicts with his discussion of  
14 the market risk premium in his opening testimony where he references the MRP  
15 estimated by Ibbotson and the MRP estimated by Morningstar which he notes

16 “measures averages returns since 1926”.<sup>93</sup> While I do not agree with the use of a  
17 historical risk premium in the CAPM, each MRP referenced by Mr. Muldoon was  
18 estimated considering historical data for a much longer time period than 30-years.

19 For reference, based on historical data from Kroll, the market return from 1926–2021  
20 is 12.34 percent<sup>94</sup> which is much greater than Mr. Muldoon’s estimated market return  
21 of 10.79 percent.

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<sup>93</sup> Staff/100, Muldoon/46.

<sup>94</sup>Kroll, Valuation Handbook: Guide to Cost of Capital, 2022

1 **Q. Do you agree with Mr. Muldoon that your estimate of the MRP is**  
2 **“overstated”?**<sup>95</sup>

3 A. No, I do not. While Mr. Muldoon does not indicate which input (i.e., market return or  
4 risk-free rate) comparing our market return estimates, I assume that the assumption  
5 that he does not agree with is my estimate of the market return. However, as noted  
6 above, the average market return from 1926–2021 is 12.34 percent as reported by  
7 Kroll which is generally consistent with the market return that I relied on in my direct  
8 testimony of 12.63 percent. Moreover, as shown in Figure 9 of my direct testimony,  
9 reviewing the range of annual equity returns that have been observed over the past  
10 century, in 49 out of the past 95 years (or roughly 52 percent of observations), the  
11 realized equity return was at least 12.63 percent or greater. Therefore, my estimate of  
12 the market return is more than reasonable considering the historical returns achieved  
13 by Large Company Stocks.

14 **Q. Has Mr. Muldoon relied on your market return to develop his CAPM in a prior**  
15 **proceeding?**

16 A. Yes, he has. In docket UE 374 for PacifiCorp, Mr. Muldoon, estimated his CAPM  
17 analysis using my estimate of the market return which was 12.60 percent.<sup>96</sup> The  
18 12.60 percent market return estimate that I and Mr. Muldoon relied on in docket UE  
19 374 for PacifiCorp is generally consistent with the 12.63 percent market return that I  
20 relied on in my CAPM in my direct testimony in the current proceeding. Therefore, it  
21 is not reasonable for Mr. Muldoon to conclude that my market return and thus MRP

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<sup>95</sup> Staff/100, Muldoon/27.

<sup>96</sup> *In the matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision*, Docket No. UE 374, Staff/206, Muldoon, Enright /1 (June 4, 2020).

1 are “overstated” when he has relied on a similar market return and MRP in  
2 PacifiCorp’s last rate case, docket UE 374.

3 **Q. Have you updated Mr. Muldoon’s CAPM analysis?**

4 A. Yes, I have updated Mr. Muldoon’s CAPM analysis to: 1) rely only on the results of  
5 his CAPM model using my proxy group; 2) include the most current Value Line  
6 Betas;<sup>97</sup> 3) rely on the near-term projected 30-year Treasury Bond yield of  
7 3.48 percent from *Blue Chip Financial Forecast* as of June 2022; and 3) rely on my  
8 estimate of the market return of 12.63 percent. As shown in Exhibit PAC/1402, these  
9 updates and adjustments result in an increase in Mr. Muldoon’s CAPM result from  
10 9.80 percent to 11.29 percent.

11 **Q. What is your conclusion regarding Mr. Muldoon’s Constant Growth DCF and**  
12 **CAPM analyses?**

13 A. My primary conclusion is that when reasonable adjustments are applied to  
14 Mr. Muldoon’s Constant Growth DCF and CAPM analyses, the results of these  
15 models increase to 9.40 percent and 11.29 percent, respectively. The updated results  
16 clearly indicate that Mr. Muldoon’s range of reasonableness of 8.85 percent to 9.38  
17 percent and ROE recommendation of 9.20 percent both of which are based on the  
18 results of his Multi-Stage DCF analysis understate the cost of equity during the period  
19 that PacifiCorp’s rates will be in effect. Finally, had Mr. Muldoon placed weight on  
20 his CAPM analysis, his ROE recommendation would have been significantly higher  
21 than the results of his Multi-Stage DCF model and more consistent with Company’s  
22 request of 9.80 percent.

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<sup>97</sup> Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022.

1           **D.      Business Risks**

2           **Q.      Did Mr. Muldoon consider the relative risks between the Company and the**  
3           **proxy group?**

4           A.      No. The only additional considerations Mr. Muldoon outlines in his testimony,  
5           beyond the results of his models, is the fact that PacifiCorp will be able to meet its  
6           current financial obligations even if there is an economic downturn and the  
7           Company’s credit ratings will not be downgraded as a result of a “usual and  
8           customary” decision by the Commission in this rate proceeding because of  
9           PacifiCorp’s affiliation with Berkshire Hathaway, Inc. (BRK) which maintains a  
10          significant cash and cash equivalents position.<sup>98</sup>

11          **Q.      What is your response?**

12          A.      The stand-alone principle of ratemaking holds that regulated rates should be based on  
13          the risks and benefits of the regulated utility, not its investors, parent or affiliates.<sup>99</sup>  
14          Since the stand-alone principle requires that the PacifiCorp’s authorized cost of  
15          capital be based on the business and financial risk of the Company individually, it is  
16          necessary to establish a group of companies that are both publicly traded and  
17          comparable to PacifiCorp in certain fundamental business and financial respects to  
18          serve as a “proxy” for determining the ROE. Mr. Muldoon’s consideration of the  
19          Company’s affiliation with BRK should not be considered in determining the ROE.  
20          The ROE for PacifiCorp should be based on the financial and business risk of  
21          PacifiCorp as a stand-alone entity. In fact, it is important to note that while S&P  
22          maintains an A credit rating with a stable outlook for PacifiCorp, S&P recently

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<sup>98</sup> Staff/100, Muldoon/ 14.

<sup>99</sup> New Regulatory Finance, Roger A. Morin Ph.D., Public Utility Reports, 2006, at 215-216.



1           downgraded the Company’s stand-alone credit profile from “a-” to “bbb+” citing  
2           increased business risk associated with wildfires in the Company’s California,  
3           Oregon and Utah operating jurisdictions.<sup>100</sup>

4                       Furthermore, as I discussed in my direct testimony, considering the stand-  
5           alone risk profile of company, I concluded that PacifiCorp has greater regulatory risk  
6           than the proxy group companies due to the earnings sharing component of the PCAM,  
7           and the absence of a revenue decoupling mechanism.<sup>101</sup> Additionally, the Company’s  
8           significant capital expenditures plan to meet Oregon’s emissions requirements will  
9           require continued access to capital at reasonable terms which means authorizing an  
10          ROE in this proceeding that supports the Company’s financial metrics.<sup>102</sup> All of these  
11          factors indicate that PacifiCorp has greater business risk than the proxy group, which  
12          means that investors should be compensated for this additional risk through an  
13          authorized return that is above the median for the proxy group companies.

14          **E.       Capital Structure**

15          **Q.       What capital structure does Mr. Muldoon recommend for PacifiCorp?**

16          A.       Mr. Muldoon recommends a capital structure comprised of 50.00 percent common  
17          equity, 49.99 percent long term-debt and 0.01 percent preferred equity for  
18          PacifiCorp.<sup>103</sup> Mr. Muldoon concludes that while the “precise” optimal capital  
19          structure is not known, a capital structure consisting of 50 percent equity and  
20          50 percent debt appears to be in the range of optimal capital structures.<sup>104</sup>

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<sup>100</sup> S&P Global Ratings, Research Update: PacifiCorp Rating Affirmed, Outlook Stable; Business Risk Reassessed On Company's Exposure to Wildfires," June 23, 2022.

<sup>101</sup> PAC/300, Bulkley/59-60.

<sup>102</sup> PAC/300, Bulkley/60-65.

<sup>103</sup> Staff/100, Muldoon/18.

<sup>104</sup> Staff/100, Muldoon/21.

1 Furthermore, Mr. Muldoon notes that the other five utilities regulated by the  
2 Commission each have an authorized equity ratio within 10 basis points of  
3 50 percent. Mr. Muldoon's recommended capital structure differs from PacifiCorp's  
4 proposed capital structure for the test year, which includes 52.25 percent common  
5 equity, 47.74 percent long-term debt and 0.01 percent preferred equity.

6 **Q. What is your conclusion regarding the appropriate capital structure for**  
7 **PacifiCorp?**

8 A. As discussed in my direct testimony, the Company's proposed equity ratio of  
9 52.25 percent common equity is slightly below the average equity of 52.71 percent of  
10 my proxy group (at the operating utility level) that I rely on in my direct testimony  
11 and that Mr. Muldoon relies on to set the high end of his range of results and  
12 therefore is reasonable. If the Commission were to adopt Mr. Muldoon's proposed  
13 capital structure of 50.00 percent common equity, 49.99 percent long-term debt and  
14 0.01 percent preferred equity that would increase the financial risk of PacifiCorp  
15 relative to the proxy group, which would in turn support a higher authorized ROE.

16 **VI. RESPONSE TO AWEC/CUB WITNESS MR. GORMAN**

17 **Q. Please summarize Mr. Gorman's ROE analyses and recommendations.**

18 A. Mr. Gorman relies on three analytical approaches to estimate the cost of equity for the  
19 Company: (1) a DCF model (a Constant Growth DCF using analyst growth rates, a  
20 Constant Growth DCF using what Mr. Gorman terms "sustainable" growth rates, and  
21 a Multi-Stage DCF); (2) a Bond Yield Plus Risk Premium analysis, and (3) a CAPM  
22 analysis. As summarized in Figure 17, Mr. Gorman's ROE estimation models result  
23 in a range from 8.80 percent to 9.70 percent, with a midpoint of 9.25 percent, which

1 is the ROE that Mr. Gorman is recommending for the Company in this proceeding.<sup>105</sup>

2 **Figure 17: Summary of Mr. Gorman’s ROE Estimation Results**

ROE Model	ROE Results	Recommended ROE by Model	Overall Recommended ROE
Constant Gwth DCF (consensus gwth)	9.55% to 9.65%	8.80%	9.25%
Constant Gwth DCF ("sustainable" gwth)	8.34% to 8.45%		
Multi-Stage DCF	7.89% to 7.96%		
Bond Yield Plus Risk Premium	9.00%	9.00%	
CAPM	9.45% to 9.70%	9.70%	

3 In addition, Mr. Gorman recommends a ratemaking capital structure of  
 4 50.95 percent common equity, 49.04 percent long-term debt and 0.01 percent  
 5 preferred equity for PacifiCorp, which he asserts will support the Company  
 6 maintaining its current “A” bond rating from S&P.<sup>106</sup>

7 **Q. What are the key points that should be considered regarding Mr. Gorman’s**  
 8 **testimony in this proceeding?**

9 A. The following are the key points that should be considered with respect to  
 10 Mr. Gorman’s testimony in this proceeding:

- 11 • *Academic* studies demonstrate that Mr. Gorman’s reliance on his “sustainable  
 12 growth rates” in the Constant Growth DCF model is not appropriate.
- 13 • Mr. Gorman’s criticism that my EPS growth rates in the DCF analysis are too  
 14 high is unfounded considering his EPS growth rates are actually higher than  
 15 those on which I have relied.

<sup>105</sup> AWEC-CUB/102, Gorman/2-3.

<sup>106</sup> AWEC-CUB/100, Gorman/3, 26.

- 1           •       The results of Mr. Gorman’s Multi-Stage DCF analysis are below any  
2 authorized return for a utility in the past 40 years, are approximately 170 basis  
3 points below the average authorized ROE for electric utilities since 2019, and  
4 as such, do not meet the comparable return standard of Hope and Bluefield  
5 and should be disregarded.
- 6           •       Mr. Gorman’s Bond Yield Plus Risk Premium analyses suffer from  
7 numerous issues, including:
- 8           ○       A fundamental flaw in that Mr. Gorman’s analyses fail to account  
9 for the inverse relationship between equity risk premia and interest  
10 rates.
- 11          ○       Without explanation or justification, a significantly modified  
12 approach to estimating the equity risk premium as compared to Mr.  
13 Gorman’s prior testimony, which simply lowers his ROE result.
- 14          ○       Reliance on outdated Treasury bond and utility bond yields.
- 15          •       Adjusting Mr. Gorman’s Bond Yield Plus Risk Premium analyses to correct  
16 for these errors and inconsistencies results in an ROE estimate of  
17 10.45 percent to 10.69 percent, both of which are higher than the ROE  
18 requested by the Company in this proceeding.
- 19          •       Two adjustments should reasonably be made to Mr. Gorman’s CAPM  
20 analyses: (i) updating the risk-free rate to reflect more current data than as of  
21 the end of April 2022 data on which Mr. Gorman relies; and (ii) reflecting the  
22 current betas of the proxy group. With these two changes, Mr. Gorman’s

1 CAPM results are significantly higher than the ROE requested by the  
2 Company in this proceeding.

3 • Mr. Gorman’s recommended ROE is based on the midpoint of his ROE  
4 analyses. The midpoint of the results of Mr. Gorman’s ROE analyses—when  
5 reasonably adjusted—would be 10.06 percent, or higher than the Company’s  
6 requested ROE of 9.80 percent in this proceeding.

7 • I disagree with the changes that Mr. Gorman suggests making to my Multi-  
8 Stage, CAPM and Bond Yield Plus Risk Premium models, particularly since  
9 his adjustment to the CAPM utilizes a market return that he is not sponsoring  
10 in this proceeding and there is no explanation or indication that he supports an  
11 adjustment to the Bond Yield Plus Risk Premium model.

12 **A. Analysis**

13 **Q. Please summarize Mr. Gorman’s DCF analyses.**

14 A. As noted, Mr. Gorman conducts three forms of the DCF analysis, a Constant Growth  
15 DCF using analyst growth rates, a Constant Growth DCF using what Mr. Gorman  
16 terms “sustainable” growth rates, and a Multi-Stage DCF.

17 **Q. Do you have any fundamental concerns with Mr. Gorman’s Constant Growth  
18 DCF analysis that relies on his “sustainable growth rate” calculation?**

19 A. Yes. The premise of Mr. Gorman’s analysis is that the “sustainable growth rate is  
20 based on the percentage of the utility’s earnings that is retained and reinvested in  
21 utility plant and equipment,” and thus the “internal growth methodology is tied to the  
22 percentage of earnings retained by the utility and not paid out as dividends.”<sup>107</sup>

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<sup>107</sup> AWEC-CUB/100, Gorman/35.

1 Accordingly, Mr. Gorman’s sustainable growth rate calculation assumes that future  
2 earnings will increase as the retention ratio (*i.e.*, the portion of earnings not paid out  
3 in dividends) increases. In other words, his approach assumes that future earnings  
4 growth is inversely related to the dividend payout ratio. However, Mr. Gorman’s  
5 assumption does not hold in the real world. For example, management may decide to  
6 (i) conserve cash for capital investments; (ii) manage the dividend payout for the  
7 purpose of minimizing future dividend reductions; or (iii) signal future earnings  
8 prospects. These decisions can and do influence the dividend payout (and therefore  
9 earnings retention) in the near-term, and such decisions have been seen recently in the  
10 market. For example, as noted in my response to Mr. Muldoon above, as a result of  
11 the economic effects of COVID-19, more than forty S&P 500 companies temporarily  
12 suspended their dividends.<sup>108</sup> Counter to Mr. Gorman’s assumption, a company’s  
13 management will alter dividend policy to respond to changes in earnings, and  
14 therefore dividend growth will not always reflect earnings growth (and vice versa).

15 **Q. Is there academic research that supports your conclusion that future earnings**  
16 **growth is not inversely related to the dividend payout ratio?**

17 A. Yes. In 2006, two articles were published in the *Financial Analysts Journal* that  
18 discussed the theory that high dividend payouts (*i.e.*, low retention ratios) are  
19 associated with low future earnings growth.<sup>109</sup> Each of those articles cited to a 2003

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<sup>108</sup> Karen Langley, U.S. Companies Slashed Dividends at Fastest Pace in More Than a Decade, *Wall Street Journal* (July 8, 2020).

<sup>109</sup> Ping Zhou and William Ruland, *Dividend Payout and Future Earnings Growth*, *Financial Analysts Journal*, Vol. 62, No. 3, 2006. *See also* Owain Gwilym, James Seaton, Karina Suddason, and Stephen Thomas, *International Evidence on the Payout Ratio, Earnings, Dividends and Returns*, *Financial Analysts Journal*, Vol. 62, No. 1, 2006.

1 study by Arnott and Asness<sup>110</sup> who found that, over the course of 130 years of data,  
2 future earnings growth is associated with high, rather than low payout ratios.<sup>111</sup>

3 Specifically, Arnott and Asness concluded:

4 Unlike optimistic new-paradigm advocates, we found that low  
5 payout ratios (high retention rates) historically precede low earnings  
6 growth. This relationship is statistically strong and robust. We found  
7 that the empirical facts conform to a world in which managers  
8 possess private information that causes them to pay out a large share  
9 of earnings when they are optimistic that dividend cuts will not be  
10 necessary and to pay out a small share when they are pessimistic,  
11 perhaps so that they can be confident of maintaining the dividend  
12 payouts. Alternatively, the facts also fit a world in which low payout  
13 ratios lead to, or come with, inefficient empire building and the  
14 funding of less than-ideal projects and investments, leading to poor  
15 subsequent growth, whereas high payout ratios lead to more  
16 carefully chosen projects. The empire-building story also fits the  
17 initial macroeconomic evidence quite well. At this point, these  
18 explanations are conjectures; more work on discriminating among  
19 competing stories is appropriate.<sup>112</sup>

20 All three studies found that there is a negative, not a positive, relationship  
21 between earnings growth rates and retention ratios. As such, Mr. Gorman's reliance  
22 on the sustainable growth rates in the Constant Growth DCF model is not appropriate.

23 **Q. Mr. Gorman states that your projected EPS growth rates are “unsustainably**  
24 **high.”<sup>113</sup> Is there any basis to Mr. Gorman's allegation?**

25 A. No. First, both Mr. Gorman and I use consensus forecasts of EPS growth rates in our  
26 respective Constant Growth DCF analyses. To the extent Mr. Gorman has concerns  
27 with the analyst growth rates used in my DCF model, those same concerns would

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<sup>110</sup> Robert Arnott and Clifford Asness, *Surprise: Higher Dividends = Higher Earnings Growth*, Financial Analysts Journal, Vol. 59, No. 1, January/February 2003.

<sup>111</sup> Since the payout ratio is the inverse of the retention ratio, the authors found that future earnings growth is negatively related to the retention ratio.

<sup>112</sup> Robert Arnott, Clifford Asness, *Surprise: Higher Dividends = Higher Earnings Growth*, Financial Analysts Journal, Vol. 59, No. 1, January/February 2003.

<sup>113</sup> AWEC-CUB/100, Gorman/62.

1 apply to his model. Second, Mr. Gorman’s claim that my average growth rate for the  
2 proxy group of 5.90 percent is too high is unfounded considering that both the  
3 average EPS growth rate (6.13 percent) and median growth rate (5.94 percent) that he  
4 uses in his Constant Growth DCF model are higher than the average EPS growth rate  
5 in my DCF analysis (5.90 percent).<sup>114</sup>

6 **Q. Are there any reasons to consider analysts’ consensus estimates of EPS growth**  
7 **to be invalid?**

8 A. No. The 2003 Global Analysts Research Settlement (Global Settlement) served to  
9 significantly reduce if not eliminate bias in analysts’ forecasts. The Global  
10 Settlement required financial institutions to insulate investment banking from  
11 analysis, prohibited analysts from participating in “road shows,” and required the  
12 settling financial institutions to fund independent third-party research. In addition,  
13 analysts covering the common stock of the proxy companies certify that their  
14 analyses and recommendations are not related, either directly or indirectly, to their  
15 compensation. A 2010 article in *Financial Analysts Journal* found that analyst  
16 forecast bias declined significantly or disappeared entirely since the Global  
17 Settlement:

18 Introduced in 2002, the Global Settlement and related regulations  
19 had an even bigger impact than Reg FD on analyst behavior. After  
20 the Global Settlement, the mean forecast bias declined significantly,  
21 whereas the median forecast bias essentially disappeared. Although  
22 disentangling the impact of the Global Settlement from that of  
23 related rules and regulations aimed at mitigating analysts’ conflicts  
24 of interest is impossible, forecast bias clearly declined around the  
25 time the Global Settlement was announced. These results suggest

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<sup>114</sup> AWEC-CUB/106 and PAC/304.



1                   that the recent efforts of regulators have helped neutralize analysts’  
2                   conflicts of interest.<sup>115</sup>

3   **Q.    Mr. Gorman also conducts a Multi-Stage DCF analysis. Should the Commission**  
4    **consider the results of Mr. Gorman’s analysis?**

5    A.    No. The results of Mr. Gorman’s Multi-Stage DCF analysis are below any authorized  
6    return for a utility in the past 40 years,<sup>116</sup> and as noted previously, are approximately  
7    170 basis points below the average authorized ROE for electric utilities since 2019.  
8    As such, Mr. Gorman’s Multi-Stage DCF results do not meet the comparable return  
9    standard of *Hope* and *Bluefield*.

10 **Q.    What does Mr. Gorman state regarding your Multi-Stage DCF analysis?**

11 A.    Mr. Gorman claims that I have ignored the results of the Multi-Stage DCF in my  
12    ROE recommendation because the results of the analysis are below the ROE range  
13    that I recommend.<sup>117</sup> (Mr. Gorman also makes the same claim regarding my Constant  
14    Growth DCF results as well). In addition, Mr. Gorman states that my third-stage  
15    growth rate is “substantially higher” than the long-term sustainable growth rates  
16    published by independent economists, and that this is a function of forward-looking  
17    real GDP growth rate based on actual historical GDP growth over the period 1929  
18    through 2020.<sup>118</sup>

19 **Q.    What is your response?**

20 A.    First, there is no basis to Mr. Gorman’s suggestion that I have ignored the results of  
21    my Multi-Stage DCF analysis (and Constant Growth DCF analysis). I established the

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<sup>115</sup> Armen Hovakimian and Ekkachai Saenyasiri, *Conflicts of Interest and Analyst Behavior: Evidence from Recent Changes in Regulation*, Financial Analysts Journal, Vol. 66, No. 4, July/August 2010, at 195.

<sup>116</sup> Consistent with my analysis of authorized ROEs discussed previously herein, the authorized ROEs exclude electric utilities with formula rates in Illinois and Vermont, and utilities’ ROEs that included a penalty.

<sup>117</sup> AWEC-CUB/100, Gorman/65.

<sup>118</sup> *Id.*, at 66.

1 recommended range for the Company’s ROE in this proceeding based on the totality  
2 of the results of the ROE models evaluated, including results that were both below  
3 and above my recommended range. The results of the Multi-Stage DCF are largely  
4 below my recommended ROE range; however, the results of my CAPM analysis are  
5 higher than my recommended range, a fact that Mr. Gorman fails to mention in his  
6 testimony.

7 Second, Mr. Gorman suggests that my third-stage growth rate is unreasonably  
8 high because I derive a forward-looking real GDP growth estimate based on historical  
9 real GDP growth over the period 1929–2020 and then add forecasted inflation.

10 However, Mr. Gorman cannot have it both ways, since, as discussed later herein, he  
11 has relied on historical real return data plus forecasted inflation for estimating the  
12 market return in his CAPM analysis. Further, while Mr. Gorman suggests that my  
13 third-stage growth rate is too high, the results of my Multi-Stage DCF are within the  
14 range of recently authorized ROEs for electric utilities. In contrast, Mr. Gorman’s  
15 Multi-Stage DCF results are well below any authorized ROE in past 40 years.

16 **B. Bond Yield Plus Risk Premium Analysis**

17 **Q. Please summarize Mr. Gorman’s Bond Yield Plus Risk Premium analysis.**

18 A. Mr. Gorman performs two Bond Yield Plus Risk Premium analyses—one that relies  
19 on Treasury bond yields and the premium of authorized returns for electric utilities  
20 over Treasury bond yields (referred to herein as his “Treasury Bond Approach”), and  
21 the other that relies on A-rated utility bond yields and the premium of authorized  
22 returns for electric utilities over those utility bond yields (referred to herein as his  
23 “Utility Bond Approach”). Specifically, for Mr. Gorman’s Treasury Bond Approach,

1 he relies on (i) the near-term projected 30-year Treasury bond yield from *Blue Chip*  
2 *Financial Forecasts* as of April 1, 2022 of 3.30 percent; and (ii) an equity risk  
3 premium of 5.70 percent, which he calculates as the long-term average spread  
4 between the annual average authorized ROE for electric utilities and the annual  
5 average 30-year Treasury bond yield in each year from 1986 through 2021.<sup>119</sup>  
6 Mr. Gorman's Treasury Bond Approach results in an ROE of 9.00 percent.

7 For Mr. Gorman's Utility Bond Approach, he relies on (i) a 13-week historical  
8 average through April 11, 2022 of the Moody's A-rated utility bond yield of  
9 3.83 percent; and (ii) a weighted average equity risk premium of 5.15 percent, which  
10 he calculates as the five-year rolling average spread between the annual average  
11 authorized ROE for electric utilities and the average annual A-rated utility bond yield  
12 in each year from 1986 through 2021, with the maximum five-year rolling average  
13 over the period weighted 75 percent and the minimum of the five-year rolling average  
14 over the period weighted 25 percent. Mr. Gorman's Utility Bond Approach results in  
15 an ROE of 8.98 percent.

16 Based on the results of these two analyses, Mr. Gorman estimates a ROE of  
17 9.00 percent for his Bond Yield Plus Risk Premium approach.

18 **Q. Do you agree with Mr. Gorman's Bond Yield Plus Risk Premium analyses?**

19 A. No, there are numerous issues with Mr. Gorman's specification of his Bond Yield  
20 Plus Risk Premium analyses. First, Mr. Gorman's analyses suffer from a  
21 fundamental flaw in that they both fail to account for the fact that the equity risk  
22 premium changes as nominal interest rates change. By applying a *historical* equity

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<sup>119</sup> AWEC-CUB/100, Gorman/44-45 and AWEC-CUB/113.

1 risk premium to a *current* or *projected* interest rate, Mr. Gorman fails to account for  
2 any relationship between interest rates and equity risk premia in his Bond Yield Plus  
3 Risk Premium analyses. For example, in his Treasury Bond Approach, Mr. Gorman  
4 estimates the ROE by adding the long-term historical average risk premium from for  
5 the period 1986–2021 to the near-term projected Treasury bond yield. Therefore,  
6 Mr. Gorman’s application of the Bond Yield Plus Risk Premium methodology  
7 violates the underlying principles of a risk premium approach and, as a result,  
8 understates the cost of equity for the Company.

9 Mr. Gorman and I agree that the first step in conducting a risk premium  
10 analysis is to develop a risk premia data set over a lengthy period of time and to  
11 calculate the risk premium as the difference between authorized ROEs for electric  
12 utilities and interest rates. Mr. Gorman and I also agree that that the relationship  
13 between the risk premia and interest rates changes over time. Despite agreeing with  
14 these principles, Mr. Gorman adds risk premia and interest rates from different time  
15 periods to develop his estimate of the ROE, which yields results that are meaningless.

16 If Mr. Gorman wishes to derive any meaningful information from historical  
17 bond yields, he must use risk premia and interest rate data from the same time  
18 periods. As discussed, the regression analysis in my direct testimony estimates a  
19 relationship between interest rates and the risk premia over time. The regression  
20 results can then be used to estimate the risk premium given a specified interest rate,  
21 and projected interest rates can be relied on in the regression equation to develop an  
22 estimate of the projected risk premium. This results in a statistically significant  
23 estimate of the ROE during the time-period that Company’s rates will be in effect. In

1 contrast, Mr. Gorman’s approach using risk premia and interest rates from different  
2 time periods (*i.e.*, historical average risk premia and current and projected interest  
3 rates) severs the relationship between these two market variables, and the costs of  
4 equity that result from the model are meaningless.

5 **Q. Can you illustrate the flaw with Mr. Gorman’s Bond Yield Plus Risk Premium**  
6 **analyses?**

7 A. Yes. For example, in his Treasury Bond Approach, Mr. Gorman adds the near-term  
8 projected Treasury bond yield as of April 1, 2022 of 3.30 percent to his historical  
9 average Treasury bond risk premium of 5.70 percent, which results in his estimated  
10 ROE of 9.00 percent. However, as shown in Exhibit AWEC-CUB/113, the average  
11 30-year Treasury bond yield over the 1986–2021 period was 5.25 percent, or  
12 195 basis points *higher* than the near-term projected Treasury bond yield relied on by  
13 Mr. Gorman. While it does not correct the fundamental flaw of Mr. Gorman’s  
14 approach, matching his estimated historical average equity risk premium of  
15 5.70 percent with the historical average interest rate during the same period (*i.e.*,  
16 5.25 percent) would produce a cost of equity of 10.95 percent, highlighting the  
17 arbitrary downward bias of Mr. Gorman’s Bond Yield Plus Risk Premium approach.

18 **Q. Are there other issues with Mr. Gorman’s Bond Yield Plus Risk Premium**  
19 **approach?**

20 A. Yes. Although fundamentally flawed as just discussed, Mr. Gorman’s Bond Yield  
21 Plus Risk Premium analyses are also internally inconsistent in their approach. To  
22 estimate the equity risk premium in his Treasury Bond Approach, Mr. Gorman simply  
23 relies on the long-term average spread between the annual average authorized ROE

1 for electric utilities and the annual average 30-year Treasury bond yield in each year  
2 from 1986 through 2021.<sup>120</sup> However, in contrast, to estimate the equity risk  
3 premium for his Utility Bond Approach, Mr. Gorman relies on the five-year rolling  
4 average spread between the annual average authorized ROE for electric utilities and  
5 the average annual A-rated utility bond yield in each year from 1986 through 2021,<sup>121</sup>  
6 with the maximum five-year rolling average over the period weighted 75 percent and  
7 the minimum five-year rolling average over the period weighted 25 percent.<sup>122</sup> In  
8 other words, in one approach of his analysis, Mr. Gorman relies on a simple long-  
9 term historical average to estimate the equity risk premium, while in the other  
10 approach he relies on a five-year rolling average plus a weighting of the maximum  
11 and minimum results, or a completely different methodology.

12 **Q. Does Mr. Gorman explain why he changes his methodology from one approach**  
13 **to the other in his Bond Yield Plus Risk Premium analysis?**

14 A. No. As support for relying on the five-year rolling-average results for his Utility  
15 Bond Approach, Mr. Gorman states that the “rolling average risk premiums mitigate  
16 the impact of anomalous market conditions and skewed risk premiums over the entire  
17 business cycle.”<sup>123</sup> While Mr. Gorman calculates a five-year rolling average for both  
18 his Treasury Bond Approach and his Utility Bond Approach in Exhibits AWEC-  
19 CUB/113 and AWEC-CUB/114, respectively, Mr. Gorman does not explain why he  
20 fails to apply the same five-year rolling average and weighting methodology to his  
21 Treasury Bond Approach.

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<sup>120</sup> AWEC-CUB/113.

<sup>121</sup> AWEC-CUB/114.

<sup>122</sup> AWEC-CUB/100, Gorman/50.

<sup>123</sup> AWEC/CUB/100, Gorman/45.

1 **Q. Would Mr. Gorman's reasoning of relying on a five-year rolling average also**  
2 **apply to his Treasury Bond Approach?**

3 A. Yes. As shown on Exhibit AWEC-CUB/114, the spread between the maximum result  
4 and minimum result of Mr. Gorman's five-year rolling average equity risk premium  
5 in his Utility Bond Approach is 302 basis points (*i.e.*, the difference between  
6 5.90 percent and 2.88 percent). Similarly, as shown on Exhibit AWEC-CUB/113, the  
7 spread between the maximum result and minimum result of Mr. Gorman's five-year  
8 rolling average equity risk premium in his Treasury Bond Approach is 284 basis  
9 points, or consistent with the spread associated with his Utility Bond Approach.  
10 Therefore, if the basis for Mr. Gorman's reliance on the five-year rolling average  
11 equity risk premia was to mitigate the impact of anomalous market conditions under  
12 his Utility Bond Approach, then presumably the same logic would also apply to his  
13 Treasury Bond Approach since the circumstances are effectively the same.

14 **Q. Is Mr. Gorman's approach to estimating the equity risk premium in his**  
15 **Treasury Bond and Utility Bond Approaches in this proceeding consistent with**  
16 **the methodology he has relied upon previously?**

17 A. No. On February 11, 2021, Mr. Gorman filed direct testimony on behalf of the  
18 Citizens Utility Board before the Illinois Commerce Commission in docket 20-0810,  
19 which was a North Shore Gas Company rate proceeding. In his testimony in the  
20 North Shore Gas Company proceeding, Mr. Gorman also conducted a Treasury Bond  
21 Approach and a Utility Bond Approach for his Bond Yield Plus Risk Premium  
22 analysis; however, Mr. Gorman has now changed the methodology he uses to  
23 estimate the risk premium, thus lowering his resulting ROE estimate.

1 Specifically, as summarized in Figure 18 below, in the North Shore Gas  
 2 proceeding, Mr. Gorman estimated the equity risk premium for both of his  
 3 approaches based solely on the maximum five-year rolling average over the 1986 to  
 4 2020 period.<sup>124</sup> However, in contrast, Mr. Gorman is now relying on a simple  
 5 historical average as opposed to five-year rolling average in his Treasury Bond  
 6 Approach *and* is weighting the minimum and maximum five-year rolling average  
 7 results in his Utility Bond Approach instead of relying solely on the maximum result.

8 **Figure 18: Comparison of Mr. Gorman’s Bond Yield Plus Risk Premium Analyses –**  
 9 **North Shore Gas Company v. Current Proceeding**

<u>Description</u>	<u>Gorman Risk Free Rate</u>	<u>Gorman Selected Equity Risk Premium</u>
<u>North Shore Gas</u>		
Treasury Bond Approach	Near-term projected 30-yr Treasury yield	Maximum 5-Yr Rolling Avg
Utility Bond Approach	13-week avg A-rate utility bond yield	Maximum 5-Yr Rolling Avg
<u>PacifiCorp Oregon</u>		
Treasury Bond Approach	Near-term projected 30-yr Treasury yield	Long-term Historical Avg
Utility Bond Approach	13-week avg A-rate utility bond yield	Wgtd Max/Min 5-Yr Rolling Avg

10 **Q. Does Mr. Gorman explain why he changes his methodology in this proceeding?**  
 11 A. No. Mr. Gorman offers no explanation or justification for changing his methodology  
 12 in this proceeding relative to the approach he applied in the same analysis previously.

<sup>124</sup> *In the matter of North Shore Gas Company, Proposed increase in rates for gas distribution service (tariffs filed October 15, 2020, Ill. Commerce Comm’n, Docket No. 20-0810, CUB Exhibit 1.0, Direct Testimony and Exhibits of Michael P. Gorman at 58 (Feb. 11, 2021).*



1 **Q. Are there any further issues with Mr. Gorman's Bond Yield Plus Risk Premium**  
2 **analyses?**

3 A. Yes. For both his Treasury Bond Approach and Utility Bond Approach, Mr. Gorman  
4 relies on outdated data. Specifically, Mr. Gorman relies on a near-term projected 30-  
5 year Treasury bond yield as of April 1, 2022 of 3.30 percent; however, as shown  
6 Table 1 of Mr. Gorman's testimony, the near-term projected 30-year Treasury bond  
7 yield as of June 1, 2022 was 3.60 percent. Likewise, for his Utility Bond Approach,  
8 Mr. Gorman relies on a 13-week average A-rated utility bond yield through April 11,  
9 2022 of 3.83 percent. However, the 13-week average A-rated utility bond yield  
10 through June 17, 2022 was 4.55 percent. Since the ROE to be established in this  
11 proceeding is to be forward-looking, there is no basis for using the outdated data as  
12 reflected in Mr. Gorman's analyses other than to lower the ROE estimate.

13 **Q. Have you recalculated Mr. Gorman's Bond Yield Plus Risk Premium analyses to**  
14 **account for the inconsistency and outdated data issues that you have raised?**

15 A. Yes. As shown in Exhibit PAC/1403 and as summarized below in **Figure 19**, I have  
16 modified Mr. Gorman's Bond Yield Plus Risk Premium analyses in two stages to  
17 highlight the impact of the changes. First, I have adjusted Mr. Gorman's Treasury  
18 Bond Approach to estimate the equity risk premium using the same five-year rolling  
19 average approach and 75 percent/25 percent weighting that Mr. Gorman utilizes in  
20 the Utility Bond Approach. In addition, I have also utilized the most recent near-term  
21 projected 30-year Treasury bond yield and A-rated utility bond yields in the analyses.  
22 Second, I have applied the same five-year rolling average equity risk premium  
23 approach that Mr. Gorman utilizes in the Utility Bond Approach to his Treasury Bond

1 Approach; however, rather than applying the 75/25 weighting in both approaches, I  
 2 have used the maximum result (*i.e.*, no weighting) consistent with Mr. Gorman’s  
 3 approach in his prior testimony. In addition, I have also utilized the most recent near-  
 4 term projected 30-year Treasury bond yield and A-rated utility bond yields in the  
 5 analyses.

6 As shown in Figure 19, by reflecting only changes to maintain consistency  
 7 with Mr. Gorman’s own analyses and using updated bond yield data, the results of  
 8 Mr. Gorman’s Bond Yield Plus Risk Premium analyses are substantially higher than  
 9 he has relied upon as the basis for his recommended ROE in this proceeding, and are  
 10 in fact higher than the Company’s requested ROE.

11 **Figure 19: Summary of Mr. Gorman’s Adjusted Bond Yield Risk Premium Analyses**

Description	Amount
(a)	(b)
Gorman As-Filed	
Treasury Bond Approach	9.00%
Utility Bond Approach	8.98%
Gorman As-Adjusted for 5-Yr Rolling Avg, 75/25 Weighting & Updated Yields	
Treasury Bond Approach	9.98%
Utility Bond Approach	9.70%
Gorman As-Adjusted for 5 Yr Rolling Avg, Max Result Only & Updated Yields	
Treasury Bond Approach	10.69%
Utility Bond Approach	10.45%

12 **Q. What does Mr. Gorman state with regard to your Bond Yield Plus Risk**  
 13 **Premium analysis?**

14 A. Mr. Gorman states that I have erroneously ignored two-thirds of the results of my  
 15 Bond Yield Plus Risk Premium analysis, even though they are consistent with the

1 most recent eight quarters of authorized ROEs.<sup>125</sup> Regardless, Mr. Gorman notes that  
2 my results are largely consistent with his results.<sup>126</sup>

3 **Q. Do you agree with Mr. Gorman characterization that you have “ignored” two**  
4 **out of three of the results of your Bond Yield Plus Risk Premium analysis?**

5 A. No, I do not agree with Mr. Gorman’s characterization. As shown in Exhibit  
6 PAC/308 at Bulkley/3, I relied on three estimates of the risk-free rate in my Bond  
7 Yield Plus Risk Premium analysis: (1) the current 30-day average yield on 30-year  
8 Treasury bonds of 1.87 percent; (2) the projected 30-year Treasury yield for Q2/2022  
9 through Q2/2023 of 2.52 percent; and (3) the average projected 30-year Treasury  
10 bond yield for the period 2023 through 2027 of 3.40 percent. However, as discussed  
11 in Section IV, the current 30-day average yield on the 30-year Treasury bond was  
12 3.12 percent as of June 15, 2022, and the yield on the 30-year Treasury Bond reached  
13 as high as 3.45 percent on June 14, 2022. As I discussed throughout my direct  
14 testimony, interest rates were (and still are) expected to increase and in fact have  
15 increased since the analysis in my direct testimony was conducted, thus my decision  
16 to place greater weight on the high-end of my Bond Yield Plus Risk Premium  
17 analysis when developing my recommended range was correct.

18 **C. CAPM Analysis**

19 **Q. Please summarize Mr. Gorman’s CAPM analysis.**

20 A. Mr. Gorman conducts two forms of the CAPM analysis, which he refers to as the  
21 “Normalized Market Risk Premium” and the other as the “Current Market Risk  
22 Premium,” with the difference being the risk-free rate on which he relies.

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<sup>125</sup> AWEC-CUB/100, Gorman/62, 71.

<sup>126</sup> *Id.*, at 71.

1 Specifically, for the “Normalized Market Risk Premium Approach,” Mr. Gorman’s  
2 CAPM analysis is based on the following inputs: (i) a near-term projected risk-free  
3 rate from *Blue Chip Financial Forecasts* as of April 1, 2022 of 3.30 percent; (ii) a  
4 beta estimate of 0.73 that reflects the long-term average of the betas published by  
5 *Value Line* for the proxy group companies; and (iii) a forward-looking market risk  
6 premium of 8.74 percent, which is based on a market return of 12.04 percent (*i.e.*, the  
7 long-term historical arithmetic average real return of the S&P 500 from 1926 through  
8 2021 as reported by *Kroll* of 9.20 percent plus a projected inflation rate based on the  
9 CPI of 2.60 percent as reported by *Blue Chip Financial Forecasts* as of April 1, 2022)  
10 minus the risk-free rate of 3.30 percent.<sup>127</sup>

11 For the “Current Market Risk Premium Approach,” Mr. Gorman’s CAPM  
12 analysis is based on the following inputs: (i) a risk-free rate based on the 30-year  
13 Treasury yield as of the end of March 2022 of 2.37 percent; (ii) the same long-term  
14 average beta estimate of 0.73; and (iii) a historical market risk premium of  
15 9.67 percent, which reflects the difference between the expected market return of  
16 12.04 percent calculated in the “Normalized Market Risk Premium” approach and the  
17 current 30-year Treasury yield of 2.37 percent.<sup>128</sup>

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<sup>127</sup> AWEC-CUB/100, Gorman/51-57.

<sup>128</sup> *Id.*

1

**Figure 20: Summary of Mr. Gorman’s CAPM Analyses**

<b>Description</b>	<b>Current Mkt Risk Premium</b>	<b>Normalized Mkt Risk Premium</b>
Risk Free Rate	2.37%	3.30%
Market Return		
Long-term historical avg. real return on S&P 500	9.20%	9.20%
Projected inflation	2.60%	2.60%
Market Return	12.04%	12.04%
Market Risk Premium	9.67%	8.74%
Beta	0.73	0.73
<b>CAPM Result</b>	<b>9.45%</b>	<b>9.70%</b>

2

Based on his analyses, Mr. Gorman concludes that “the most reasonable

3

CAPM return estimate for PacifiCorp in this case” is 9.70 percent, which is consistent

4

with the result of his Normalized Market Risk Premium approach.<sup>129</sup>

5

**1. Risk Free Rate**

6 **Q.**

**Do you agree with the risk-free rates that Mr. Gorman relies upon for his**

7

**CAPM analyses?**

8 **A.**

Yes, while Mr. Gorman does not consider a long-term projected risk-free rate such as

9

I have done, in general, I agree with considering a current and near-term projected

10

risk-free rate for purposes of the CAPM analysis. However, I disagree that the

11

CAPM analysis should rely on the current and near-term projected risk-free rates as

12

of April 1, 2022, as Mr. Gorman has done, and rather should instead reflect the most

13

current data. The cost of equity is being estimated for the forward-looking period

14

when the Company’s rates will be in effect, and there is no basis to reflect historical

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<sup>129</sup> *Id.*, at 57.

1 data particularly when more current data is available. Thus, the risk-free rate should  
2 reflect where the market expects it to be during the period in which rates will be in  
3 effect, not where the risk-free rate was in the past. As discussed previously herein,  
4 the Federal Reserve is expected to increase short-term interest rates to combat  
5 inflation, and analysts expect that government bond yields are expected to increase as  
6 well, and indeed, this is what has occurred from April to June 2022.

7 **Q. Does Mr. Gorman explain why he has used April 2022 data instead of more**  
8 **current data?**

9 A. No. It is unclear why Mr. Gorman relied on data as of April 1, 2022 when his  
10 testimony was filed on June 22, 2022, particularly considering that in Table 1 of his  
11 testimony he includes the near-term projected 30-year Treasury yield as reported by  
12 *Blue Chip Financial Forecasts* as of June 1, 2022.

13 **Q. What is the difference between the risk-free rates that Mr. Gorman relies upon**  
14 **as of April 1 versus the more current risk-free rates?**

15 A. As shown in Figure 20, Mr. Gorman relies on the current 30-year Treasury yield of  
16 2.37 percent in his “Current Market Risk Premium” approach. However, the current  
17 30-year Treasury yield as of June 15, 2022 was 3.39 percent, or 102 basis points  
18 higher than what Mr. Gorman has relied upon.<sup>130</sup> Similarly, Mr. Gorman relies on the  
19 near-term projected Treasury yield of 3.30 percent as reported by *Blue Chip*  
20 *Financial Forecasts* as of April 1, 2022 in his “Normalized Market Risk Premium”  
21 approach.<sup>131</sup> However, as shown in Table 1 of Mr. Gorman’s testimony, the near-  
22 term projected 30-year Treasury yield as reported by *Blue Chip Financial Forecasts*

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<sup>130</sup> St. Louis Federal Reserve.

<sup>131</sup> AWEC-CUB/100, Gorman/14, Table 1, projected 30-year Treasury bond as of April 2022 for 3Q/2023.

1 as of June 1, 2022 is 3.60 percent, or 30 basis points higher than what he has relied  
2 upon.<sup>132</sup>

3 **2. Beta Coefficient**

4 **Q. Why does Mr. Gorman rely on the long-term average beta of the proxy group**  
5 **instead of the current beta for each of the proxy group companies in his CAPM**  
6 **analysis?**

7 A. Mr. Gorman states that the average *Value Line* beta for the proxy group is currently  
8 0.88.<sup>133</sup> However, he states that the average beta of the proxy group has been  
9 between 0.60 and 0.80 prior to the COVID-19 pandemic, after which time they  
10 became elevated.<sup>134</sup> As such, Mr. Gorman concludes that the current betas for the  
11 proxy group are abnormally high and relies on a “normalized” historical average beta  
12 estimate of 0.73 for the proxy group, which reflects the average *Value Line* beta of  
13 the proxy group from 3Q/2014 through 1Q/2022.<sup>135</sup>

14 **Q. Does Mr. Gorman rely on the current average beta for the proxy group of 0.88**  
15 **in his CAPM analysis at all?**

16 A. No. Mr. Gorman relies solely on the historical average beta estimate for the proxy  
17 group of 0.73 in both his “Current Market Risk Premium” approach and “Normalized  
18 Market Risk Premium” approach to the CAPM analysis.

19 **Q. Has Mr. Gorman previously relied on the current average beta of the proxy**  
20 **group for his CAPM analysis?**

21 A. Yes. In his direct testimony in the North Shore Gas Company rate proceeding

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<sup>132</sup> *Id.*, projected 30-year Treasury bond as of June 2022 for 3Q/2023.

<sup>133</sup> AWEC-CUB/117, Gorman/1.

<sup>134</sup> AWEC-CUB/100, Gorman/52; AWEC-CUB/117, Gorman/2.

<sup>135</sup> AWEC-CUB/100, Gorman/53.

1 previously discussed, Mr. Gorman conducted a CAPM analysis just as he has done in  
2 this proceeding, and in that proceeding, he noted that the current betas were above the  
3 longer-term average, yet he nonetheless relied on the current betas for the proxy  
4 group for his CAPM analysis. In that testimony, Mr. Gorman states:

5 As shown on my CUB Exhibit 1.16, page 1, the average beta of  
6 my proxy group is 0.88. This means that my proxy group is less  
7 risky than the market as a whole. I also review the long-term trend  
8 of *Value Line* betas reported for the proxy group companies. As  
9 shown on CUB Exhibit 1.16, page 2, the proxy group's betas  
10 generally range between 0.63 and 0.85, or an average of  
11 approximately 0.73. Thus, the current beta estimates of around  
12 0.88 have recently increased and are now above the high end of  
13 the historical range. Nevertheless, I will use the current average  
14 utility beta in my CAPM analysis of approximately 0.88.<sup>136</sup>

15 Therefore, the historical average range of the beta estimates in that proceeding  
16 was similar to the historical average range in this proceeding, and in fact, the current  
17 average beta for the proxy group in the North Shore Gas proceeding was 0.88, or the  
18 same as the current average beta of the proxy group in this proceeding. Although the  
19 facts are consistent, in that prior proceeding, Mr. Gorman relied on the current beta of  
20 the proxy group for his CAPM analysis, yet in this proceeding, he has solely relied on  
21 the lower long-term historical average beta of the proxy group. Mr. Gorman fails to  
22 explain why, when faced with the same facts, he determined that it was appropriate to  
23 use the current beta in that prior recent proceeding, yet now has decided to disregard  
24 consideration of the current beta for his CAPM analysis.

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<sup>136</sup> *In the matter of North Shore Gas Company, Proposed increase in rates for gas distribution service (tariffs filed October 15, 2020)*, Ill. Commerce Comm'n, Docket No. 20-0810, CUB Exhibit 1.0, Direct Testimony and Exhibits of Michael P. Gorman at 58 (Feb. 11, 2021).



1                   **3.       Market Return / Market Risk Premium**

2   **Q.    Do you agree with the manner in which Mr. Gorman has calculated the market**  
3   **return for purposes of his CAPM analyses?**

4   A.    No, I have a number of concerns with Mr. Gorman’s calculation of his market return.  
5        As discussed, Mr. Gorman calculates what he terms a “forward-looking” estimate of  
6        the market return that reflects the long-term historical arithmetic average real return  
7        of the S&P 500 from 1926 through 2021 of 9.20 percent plus a projected inflation rate  
8        based on the CPI of 2.60 percent as reported by *Blue Chip Financial Forecasts* as of  
9        April 1, 2022.

10           Mr. Gorman’s use of historical market returns and the current risk-free rate  
11        mixes data for two separate periods and thereby ignores the fact that there is an  
12        inverse relationship between interest rates and the market risk premium (*i.e.*, as  
13        interest rates decrease, the market risk premium increases and vice versa).

14        Mr. Gorman’s application of a current or projected interest rate to a historical market  
15        return is arbitrary and inaccurate, as it violates the fundamental relationship between  
16        interest rates and the equity premium.

17   **Q.    Is there support in other jurisdictions for the use of a forward-looking market-**  
18   **risk premium in the CAPM analysis such as you have relied upon?**

19   A.    Yes. The Maine Public Utilities Commission (Maine PUC), and the Federal Energy  
20        Regulatory Commission (FERC) have also relied on the Constant Growth DCF model  
21        to estimate the market return. The Maine PUC has used the CAPM results as a check  
22        on the reasonableness of the DCF results and did not dispute the use of the forward-

1 looking market risk premium by the parties in their calculation of the CAPM.<sup>137</sup> In  
2 *Opinion No. 569-A*, the FERC continued to support the use of the Constant Growth  
3 DCF model to calculate the market return for the CAPM noting:

4 We also continue to find that the CAPM should use a one-step DCF for  
5 its risk premium. This is because the rationale for using a two-step DCF  
6 methodology for a specific group of utilities does not apply when  
7 conducting a DCF study of the dividend-paying companies in the S&P  
8 500, as the Commission found in *Opinion Nos. 531-B and 569*. A long-  
9 term component is unnecessary because of the regular updates to the  
10 S&P 500, which allows it to continue to grow at a short-term growth  
11 rate and because S&P 500 companies include stocks that are both new  
12 and mature, the latter of which have a moderating effect on the short-  
13 term growth rates.<sup>138</sup>

14 **Q. Mr. Gorman also states that he calculates a market risk premium of 6.30 percent**  
15 **based on the arithmetic average of the achieved total return on the S&P 500 less**  
16 **the total return on long-term Treasury bonds as noted in the 2022 SBBI**  
17 **Yearbook.<sup>139</sup> Do either of Mr. Gorman’s CAPM analyses rely on this**  
18 **6.30 percent market risk premium?**

19 A. No. Neither of Mr. Gorman’s CAPM analyses that he conducts rely on this market  
20 risk premium. Mr. Gorman does not explain why he discusses this in his testimony.

21 **Q. Mr. Gorman states that the primary issue that he has with your CAPM analysis**  
22 **is that you rely on a market return that is calculated from a single analytical**  
23 **approach. Is this criticism by Mr. Gorman valid?**

24 A. No, Mr. Gorman’s criticism is not valid. Mr. Gorman’s issue regarding my reliance  
25 on a single analytical method for determining an input to the CAPM analysis is

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<sup>137</sup> *In the matter of Emera Maine, Request for Approval of Proposed Rate Increase*, Maine Pub. Util. Comm’n, Docket No. 2017-00198, Order at 43 (June 28, 2018).

<sup>138</sup> Federal Energy Regulatory Commission, *Opinion No. 569-A*, at P 85 (footnotes omitted).

<sup>139</sup> AWEC-CUB/100, Gorman/54-44.

1 unfounded considering he has done the same thing in terms of his beta and market  
2 return estimates by also relying on a single analytical method. As discussed,  
3 Mr. Gorman disregards the current beta in favor of the long-term average beta for  
4 both of his forms of the CAPM, which as noted, is contradictory to his prior approach  
5 in the North Shore Gas proceeding to specifying the beta under similar circumstances.  
6 Further, Mr. Gorman has relied on one estimate of the market return, 12.04 percent  
7 (*i.e.*, the long-term historical arithmetic average real return of the S&P 500 from 1926  
8 through 2021 as reported by *Kroll* of 9.20 percent plus a projected inflation rate based  
9 on the CPI of 2.60 percent as reported by *Blue Chip Financial Forecasts* as of  
10 April 1, 2022).

11 **Q. Mr. Gorman also suggests that your CAPM is based on inflated market risk**  
12 **premiums.<sup>140</sup> How does your forward-looking market return compare to**  
13 **historical returns for Large Company Stocks?**

14 A. Consistent with the analysis presented in Figure 9 of my direct testimony, given the  
15 range of annual equity returns that have been observed over the past century, a  
16 current expected market return of 12.63 percent as reflected in Exhibit PAC/307 is  
17 not unreasonable. In 50 out of the past 96 years (or approximately 52 percent of the  
18 observations), the realized equity return was at least 12.63 percent or greater.  
19 Furthermore, as shown in Figure 21 below, my estimate of the market return of  
20 12.63 percent is well below the actual average market return for Large Company  
21 Stocks from 2009 to 2021 (*i.e.*, the period after the Great Recession of 2008/09  
22 through the most current data available) of 16.55 percent.

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<sup>140</sup> AWEC/CUB/100, Gorman/62.

1 **Figure 21: Total Return for Large Company Stocks – 2009-2021**<sup>141</sup>

<b>Large Company Stock</b>	
<b>Year</b>	<b>Total Return</b>
2009	26.46%
2010	15.06%
2011	2.11%
2012	16.00%
2013	32.39%
2014	13.69%
2015	1.38%
2016	11.96%
2017	21.83%
2018	-4.38%
2019	31.49%
2020	18.40%
2021	28.70%
Average	16.55%

2 **Q. Does Mr. Gorman suggest that your CAPM analysis should be revised?**

3 A. Yes, Mr. Gorman states that my analysis can be revised “to reflect a more reasonable  
4 estimate of the market risk premium,” and does so by subtracting my risk-free rates  
5 (*i.e.*, the current, near-term projected and long-term projected 30-year Treasury bond  
6 yields) from what Mr. Gorman’s claims is his average return on the market of  
7 11.37 percent.<sup>142</sup> Mr. Gorman then states by applying these “corrected” market risk  
8 premiums to my beta estimates produces CAPM results ranging from 8.85 percent to  
9 10.46 percent (mean) and 8.85 percent to 10.17 percent (median).<sup>143</sup>

10 **Q. Is there any basis to Mr. Gorman’s “revision” to your CAPM analysis?**

11 A. No. Mr. Gorman claims that he is “correcting” my analysis by using his market  
12 return of 11.37 percent; however, that is not Mr. Gorman’s market return.

<sup>141</sup> *Kroll*, Cost of Capital Navigator.

<sup>142</sup> AWEC/CUB/100, Gorman/69.

<sup>143</sup> *Id.*, at 70.

1 Mr. Gorman's market return is 12.04 percent. While I do not agree with  
2 Mr. Gorman's market return of 12.04 percent for the reasons discussed, his  
3 adjustment to my CAPM analysis is clearly not valid since he relies on data that he is  
4 not even using in his own analysis.

5 **4. CAPM Results**

6 **Q. If reasonable adjustments are made to Mr. Gorman's CAPM analysis to reflect**  
7 **updated data, do the results of his analyses change?**

8 A. Yes. As discussed, two adjustments that should reasonably be made to Mr. Gorman's  
9 CAPM analyses are: (i) updating the risk-free rate to reflect more current data than as  
10 of the end of April 2022 data on which Mr. Gorman relied; and (ii) reflecting the  
11 current betas of the proxy group.

12 **Q. What are the results of Mr. Gorman's CAPM analyses if these two updates are**  
13 **made to his CAPM analyses?**

14 A. I have updated Mr. Gorman's analysis for both of these changes individually, as well  
15 as collectively, and the results of these updates are reflected in Figure 22 as well as in  
16 Exhibit PAC/1404. As shown in Figure 22, when the current risk-free rate that  
17 Mr. Gorman relies on in his "Current Market Risk Premium" CAPM analysis is  
18 updated to the current 30-day Treasury yield as of June 15, 2022, his model result  
19 increases from 9.45 percent to 9.72 percent. Likewise, when the near-term projected  
20 30-year Treasury yield that Mr. Gorman relies on in his "Normalized Market Risk  
21 Premium" CAPM analysis is updated, his model result increases from 9.70 percent to  
22 9.78 percent.

1 **Figure 22: Adjusted Results of Mr. Gorman’s CAPM Analyses**

Description	Current Mkt Risk Premium	Normalized Mkt Risk Premium
As-Filed	9.45%	9.70%
<i>Update 1</i> : Updated Risk-Free Rate	9.72%	9.78%
<i>Update 2</i> : Updated Current Beta	10.88%	10.99%
<i>Both Updates</i> : Updated Risk-Free Rate & Current Beta	11.00%	11.03%
Difference b/t Gorman As-Filed and Both Updates	1.55%	1.33%

2 Similarly, as shown in Figure 22, when the current betas for the proxy group  
3 are used in Mr. Gorman’s CAPM analyses, the results of his “Current Market Risk  
4 Premium” and “Normalized Market Risk Premium” CAPM analyses would increase  
5 to 10.88 percent and 10.99 percent, respectively.

6 When both of these reasonable adjustments are made to Mr. Gorman’s CAPM  
7 analyses, his CAPM results increase substantially to 11.00 percent and 11.03 percent.

8 **D. Overall ROE Recommendation**

9 **Q. What is Mr. Gorman’s overall ROE recommendation for the Company in this**  
10 **proceeding?**

11 A. Based on the midpoint of the results of his three ROE estimation models, Mr. Gorman  
12 recommends an ROE of 9.25 percent.

13 **Q. You have discussed various issues with Mr. Gorman’s analyses and adjustments**  
14 **that should be reasonably made to those analyses. What is the midpoint of**  
15 **Mr. Gorman’s analyses once these adjustments are made to his ROE analyses?**

16 A. As shown in **Figure 23** below, the midpoint of the results of Mr. Gorman’s ROE  
17 analyses when reasonably adjusted would be 10.06 percent, or higher than the

1 Company’s requested ROE in this proceeding. This reflects removal of the results of  
 2 the Multi-Stage DCF analysis from consideration because they were below any  
 3 authorized utility ROE in the past 40 years, correcting the inconsistencies and  
 4 updating the data in the Bond Yield Plus Risk Premium analysis, and reflecting the  
 5 updated risk-free rate and betas in the CAPM analysis.

6 **Figure 23: Midpoint of Mr. Gorman’s Adjusted ROE Results**

ROE Model	ROE Results	Recommended ROE by Model	Overall Recommended ROE
Constant Gwth DCF (consensus gwth)	9.55% to 9.65%	9.10%	10.06%
Constant Gwth DCF ("sustainable" gwth)	8.34% to 8.45%		
Multi-Stage DCF	n/a		
Bond Yield Plus Risk Premium	10.45% to 10.69%	10.57%	
CAPM	11.00% to 11.03%	11.03%	
Company Requested ROE			9.80%

7 **Q. Does Mr. Gorman caveat his ROE recommendation for the Company in any**  
 8 **manner?**

9 A. Yes. While Mr. Gorman recommends an ROE of 9.25 percent based on the midpoint  
 10 of the results of his three ROE estimation models, he also states that, “[s]hould the  
 11 Commission adopt a lower equity ratio that is more in-line with the industry as well  
 12 as the proxy group,”<sup>144</sup> he concludes that an ROE of 9.20 percent is reasonable for the  
 13 Company.

<sup>144</sup> AWEC-CUB/100, Gorman/71.

1 **Q. Is there a basis for Mr. Gorman’s suggestion that the ROE should be lower by**  
2 **5 basis points if the Commission adopts a lower equity ratio for the Company**  
3 **than what it requested?**

4 A. No. If the Commission authorizes an equity ratio that is *lower* than what the  
5 Company has requested, there is no basis that the ROE should also be arbitrarily  
6 *lower* by 5 basis points. All else equal, a lower equity ratio would increase the  
7 Company’s leverage and thus directionally increase risk, which means that the ROE  
8 should be higher not lower as Mr. Gorman suggests.

9 **VII. RESPONSE TO WALMART WITNESS MR. KRONAUER**

10 **Q. Please summarize the ROE testimony of Mr. Kronauer.**

11 A. Mr. Kronauer does not conduct an ROE analysis and does not provide a specific ROE  
12 recommendation for PacifiCorp in this proceeding. Mr. Kronauer states that Walmart  
13 is concerned about the reasonableness of the Company’s requested ROE given the  
14 Company’s use of a future test year which reduces regulatory lag, and Mr. Kronauer’s  
15 analysis of recently authorized ROEs for other integrated electric utilities in Oregon  
16 and other jurisdictions across the U.S.<sup>145</sup> Mr. Kronauer urges the Commission to  
17 consider the effect of the proposed ROE on the Company’s revenue requirement and  
18 customer rates.

19 By way of evidence, Mr. Kronauer provides data from Regulatory Research  
20 Associates on authorized returns for electric utilities in other jurisdictions from 2019–  
21 2022. Specifically, Mr. Kronauer provides average returns in each year for all  
22 electric utilities and for integrated electric utility companies. Mr. Kronauer suggests

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<sup>145</sup> Walmart/100, Kronauer/6.



1 that recently authorized ROEs have been declining and thus the Company’s proposed  
2 ROE of 9.80 percent is “counter to broader electric industry trends”.<sup>146</sup> Further,  
3 Mr. Kronauer notes that the Company’s requested ROE of 9.80 percent, which is  
4 within the range of results presented in my direct testimony, is in the top third of  
5 authorized ROEs for vertically integrated electric utilities since 2019. While  
6 Mr. Kronauer reviewed authorized return data, he recognizes that the decisions of  
7 other state regulatory commissions are not binding on the Commission and that each  
8 commission considers the specific circumstance in each case in the determination of  
9 the proper ROE.<sup>147</sup>

10 **Q. What is your response to Mr. Kronauer’s testimony regarding authorized ROEs**  
11 **for other integrated electric utilities?**

12 A. I have several concerns with Mr. Kronauer’s analysis of authorized ROEs. First  
13 while Ms. Kronauer is correct to exclude distribution-only electric utilities, his  
14 sample of vertically integrated electric utilities incorrectly includes the authorized  
15 returns for companies that were determined as part of an annual formula filing and the  
16 authorized returns for companies operating in Arizona that relies on fair value rate  
17 base. As discussed in Section III, ROEs established pursuant to a formula should be  
18 excluded because the ROE is inconsistent with the approach that the Commission has  
19 typically considered in setting the ROE. Additionally, in Arizona, a return is awarded  
20 on the rate base increment above original cost; however, the commission in Arizona  
21 has recently reduced the ROE for companies to account for the return granted on the  
22 fair value increment. Therefore, recent returns in Arizona would not be considered

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<sup>146</sup> Walmart/100, Kronauer/9.

<sup>147</sup> Walmart/100, Kronauer/10.

1 market-based given the applied reduction and should be excluded. Excluding ROEs  
2 established pursuant to a formula and the authorized returns in Arizona would  
3 increase Mr. Kronauer's average authorized ROE since 2019 from 9.60 percent to  
4 9.65 percent, and result in a range of returns from 8.75 percent to 10.60 percent.  
5 Thus, the average authorized ROE of 9.65 percent would be 15 basis points greater  
6 than the Company's current authorized ROE of 9.50 percent. Further, while  
7 Mr. Kronauer appears to indicate that the Company's current authorized ROE of  
8 9.50 percent is reasonable based on his review of authorized ROEs in Oregon and  
9 across the U.S., this would imply that Mr. Kronauer believes that PacifiCorp has less  
10 risk than comparable vertically-integrated electric utilities. However, Mr. Kronauer  
11 has not evaluated the relative risk of PacifiCorp. Furthermore, Mr. Kronauer has not  
12 considered recent authorized ROEs in the context of current capital market  
13 conditions. As discussed in Section IV, interest rates have increased over the past  
14 few months and are expected to increase over the near-term as the Federal Reserve  
15 normalizes monetary policy; therefore, the cost of equity is expected to increase  
16 during the period that the Company's rate will be in effect. Finally, if the  
17 Commission finds recently authorized ROEs to be a useful benchmark in this  
18 proceeding, the Company's requested ROE of 9.80 percent is only slightly greater  
19 than the average authorized ROE of 9.65 percent since 2019 shown in Figure 2 in my  
20 reply testimony which is reasonable considering the Company's above average  
21 business risk and the expectation that interest rates will increase over the near-term.

1           **VIII.           RESPONSE TO AWEC WITNESS MR. MULLINS**

2   **Q.   Please summarize Mr. Mullins’s conclusions regarding the effect of the**  
3           **Company’s proposed changes to the TAM and the PCAM on the Company’s**  
4           **business risk and cost of equity.**

5   A.   Without any analysis to support his recommendation, Mr. Mullins suggests that the  
6           Company’s overall risk profile is reduced and the Company ROE should be reduced  
7           based on the Company’s proposed changes in the TAM and the PCAM.<sup>148</sup>

8   **Q.   What is your response?**

9   A.   The investor-required ROE in this proceeding is being determined based on a proxy  
10           group of risk-comparable companies. Therefore, the premise of Mr. Mullins’s  
11           argument is incorrect and the conclusion that follows is unsubstantiated. The relevant  
12           question in determining the risk mitigating effect of the Company’s proposed changes  
13           to the TAM and PCAM is not whether the Company will have less risk as a result of  
14           the implementation of the changes. Since the ROE is being developed based on data  
15           for a proxy group, the relevant comparison is the risk of the Company as compared to  
16           the proxy group overall.

17           Mr. Mullins has not conducted any analysis that compares the Company’s  
18           regulatory mechanisms to the regulatory mechanisms of the proxy group being used  
19           to develop the ROE to determine if a company has greater regulatory risk than the  
20           proxy group. Absent this comparison, there is no basis to conclude that PacifiCorp’s  
21           ROE should be reduced due to the Company’s proposed changes to the TAM and  
22           PCAM.

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<sup>148</sup> AWEC/100, Mullins/39-40.

1 **Q. Have you conducted any analysis of the relative risk of PacifiCorp and the proxy**  
2 **group companies?**

3 A. Yes. As shown in Figure 24 below and Exhibit PAC/310, 88.10 percent of the  
4 operating companies held by the proxy group are allowed to pass through fuel costs  
5 and purchased power costs directly to customers, without deadbands, sharing bands  
6 and earnings tests. PacifiCorp’s proposal still includes a deadband and earnings test;  
7 therefore, while the changes will move the Company’s PCAM closer to those  
8 approved for the proxy group, the changes still result in increased fuel cost recovery  
9 risk relative to the proxy group. Furthermore, as I discussed in my direct testimony, I  
10 concluded that PacifiCorp has greater regulatory risk than the proxy group companies  
11 due to the earnings sharing component of the PCAM, and the absence of a revenue  
12 decoupling mechanism.<sup>149</sup>

13 **Figure 24: Alternative Ratemaking Mechanism<sup>150</sup>**

Alternative Ratemaking Mechanism	Percentage of the Operating Subsidiaries in the Proxy Group
Fuel Cost Recovery w/o deadband	88.10%
Full/ Partial Forward Test Year	50.00%
Year-End Rate Base	45.24%
Non-Volumetric Rate Design (Revenue Decoupling, SFV Rate Design, and FRP)	55.95%
Capital Cost Recovery Mechanism	52.38%

<sup>149</sup> PAC/300, Bulkley/59-60.

<sup>150</sup> PAC/310

1           **IX.           RESPONSE TO KWUA/OFBF WITNESS MR. REED**

2   **Q.    Please summarize Mr. Reed's testimony regarding the ROE for PacifiCorp in**  
3   **this proceeding.**

4   A.   Mr. Reed does not perform any quantitative analyses of the appropriate ROE for  
5   PacifiCorp. Rather, he recommends that PacifiCorp's authorized ROE and capital  
6   structure be continued at the current level that was approved by the Commission in  
7   PacifiCorp's last rate case, docket UE 374.<sup>151</sup> Thus, Mr. Reed is recommending for  
8   the Company an ROE of 9.50 percent and a capital structure consisting of  
9   50.00 percent common equity, 49.99 percent long-term debt and 0.01 percent  
10   preferred equity.

11 **Q.    What is your response?**

12 A.   Mr. Reed's analysis is deficient in that it does not consider the significant changes in  
13   market conditions that affect the investor-required return since the Company's last  
14   rate proceeding. Without any consideration of these significant changes in  
15   macroeconomic conditions, or a quantitative analysis, Mr. Reed's recommendation  
16   should be disregarded.

17           As discussed in my direct testimony, the authorized ROE for a regulated  
18   utility such as PacifiCorp must meet the three legal standards outlined in the *Hope*  
19   and *Bluefield* decisions.<sup>152</sup> Those are: 1) sufficient to maintain the financial integrity  
20   of the utility; 2) comparable to the returns available to investors in companies with  
21   commensurate risk; and 3) adequate to support credit quality and access to capital on  
22   reasonable terms. The ROE analysis in my direct testimony for PacifiCorp was based

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<sup>151</sup> KWUA-OFBF/100, Reed/11.

<sup>152</sup> PAC/300, Bulkley/9.

1 on market data, which indicated that the reasonable range of returns for the Company  
2 was from 9.90 percent to 10.75 percent. The market expected range reflects the range  
3 of results for the proxy group companies, the relative risk of PacifiCorp as compared  
4 to the proxy group, and current capital market conditions. Considering the market  
5 expected range, the Company's proposed ROE of 9.80 percent ROE is conservative.

6 In summary, it is not reasonable to recommend the ROE that was approved in  
7 a prior case as Mr. Reed has because the ROE was based on prevailing market data at  
8 the time which may no longer be relevant in the current proceeding. The ROE in the  
9 current proceeding must be based on an analysis of current market data and the  
10 relative risk of PacifiCorp to the proxy group to ensure that the recommended ROE  
11 meets the legal standards outlined in *Hope* and *Bluefield*.

12 **X. SUMMARY AND RECOMMENDATION**

13 **Q. Please summarize your conclusions and recommendation.**

14 A. Nothing in the other ROE witnesses' testimony has caused me to change my  
15 recommended range of results or my conclusion that the Company's proposed ROE  
16 of 9.80 percent is reasonable. The results of the ROE estimation models that have  
17 been developed by the other ROE witnesses in this case have not considered current  
18 and prospective market conditions including the expectation that interest rates are  
19 expected to increase over the near-term in response to increased inflation and the  
20 Federal Reserve's normalization of monetary policy. Therefore, the  
21 recommendations of the other ROE witnesses are likely understating the cost of  
22 equity during the period that PacifiCorp's rates will be in effect. Furthermore,  
23 reasonable changes to Mr. Muldoon's and Mr. Gorman's analyses demonstrate that

1 their ROE model results would be supportive of my recommended range of returns of  
2 9.90 percent to 10.75 percent. Therefore, I continue to believe that the Company's  
3 proposed ROE of 9.80 percent is reasonable and appropriate. An authorized ROE at  
4 this level balances the interests of PacifiCorp's customers and shareholders and  
5 enables PacifiCorp to attract capital on reasonable terms and conditions.

6 **Q. What factors support the Company's proposed ROE of 9.80 percent?**

7 A. An authorized ROE of 9.80 is reasonable and appropriate for PacifiCorp because it:

- 8 1. Is supported by the analyses contained in my direct testimony;
- 9 2. Is consistent with current and prospective capital market conditions;
- 10 3. Is consistent with the range of ROE awards for integrated electric utilities in  
11 other state jurisdictions;
- 12 4. Is consistent with the updated results of the other ROE witnesses' ROE  
13 estimation models reflecting reasonable changes to the inputs and assumptions;
- 14 5. Considers the unique business and operating risks of PacifiCorp's electric  
15 operations in Oregon; and
- 16 6. Will support PacifiCorp's ability to attract capital to finance investments at  
17 reasonable rates, which will provide long-term benefits to ratepayers by  
18 limiting the long-term cost of capital.

19 **Q. What is your recommendation with respect to the capital structure?**

20 A. PacifiCorp's proposed capital structure consisting of 52.25 percent common equity,  
21 47.74 percent long-term debt and 0.01 percent preferred equity is reasonable relative  
22 to the operating utilities held by the proxy group companies. Therefore, I recommend  
23 the Commission adopt PacifiCorp's proposed capital structure.

1 **Q. Does this conclude your reply testimony?**

2 A. Yes, it does.



Docket No. UE 399  
Exhibit PAC/1401  
Witness: Ann E. Bulkley

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Ann E. Bulkley  
Business Segment Data for WEC Energy Group, Inc.

July 2022

BUSINESS SEGMENT DATA FOR WEC ENERGY GROUP, INC.

WEC Energy Group, Inc. - Revenue (\$000)

Year	Total	Wisconsin		Illinois		Other States		Non-Utility		Corporate and Other	Reconciling Eliminations	Notes	Percent Reg / Total	
		Electric	Natural Gas	Natural Gas	Natural Gas	Electric Transmission	Energy Infrastructure	Electric	Gas				Electric / Total	Gas / Total
2020	8,316,000	4,538,600	1,498,400	1,672,800	519,000	-	539,500	500	(452,800)	[1]	98.95%	54.58%	44.37%	
2019	7,241,700	4,274,000	1,199,500	1,321,900	384,100	-	508,500	2,200	(448,500)	[1]	99.14%	59.02%	40.12%	
2018	7,523,100	4,317,600	1,329,500	1,357,100	426,000	-	495,900	4,400	(407,400)	[1]	98.77%	57.39%	41.37%	
<b>3 yr. average</b>											<b>98.95%</b>	<b>57.00%</b>	<b>41.96%</b>	

Notes:

[1] Source: WEC - 2021 Form 10-K, pgs. 49, 53, 55, 57, 58, 135-136; and 2020 Form 10-K, pg. 46

Docket No. UE 399  
Exhibit PAC/1402  
Witness: Ann E. Bulkley

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Ann E. Bulkley

Adjustment to Muldoon's Constant Growth DCF Model;  
Adjustment to Muldoon's Hamada Equation;  
Adjustment to Muldoon's Multi-Stage DCF Model Y;  
Adjustment to Muldoon's CAPM Analysis;  
Adjustment to Muldoon's ROE Analysis

July 2022

MULDOON CONSTANT GROWTH DCF -- PAC PROXY GROUP -- PROJECTED EARNINGS AND DIVIDEND GROWTH RATES

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]
Value Line	Annual	Stock Price at	Stock Price at	Stock Price at	Average	Expected	Value Line	Value Line	Yahoo!	Zacks	Average	
Dividend	(2023)	5/1/2022	6/1/2022	7/1/2022	Stock Price	Dividend	Dividend	Earnings	Finance	Earnings	Growth Rate	ROE
Company						Yield	Growth	Growth	Earnings	Growth		
ALLETE, Inc.	\$2.70	\$58.24	\$62.32	\$60.42	\$60.33	4.48%	3.46%	6.00%	8.70%	8.70%	6.71%	11.19%
Alliant Energy Corporation	\$1.81	\$57.85	\$63.19	\$60.07	\$60.37	3.00%	5.99%	6.00%	6.00%	5.70%	5.92%	8.92%
Ameren Corporation	\$2.52	\$91.42	\$93.77	\$92.19	\$92.46	2.73%	7.22%	6.50%	6.46%	7.20%	6.85%	9.57%
American Electric Power Company, Inc.	\$3.35	\$97.36	\$102.04	\$97.95	\$99.12	3.38%	5.81%	6.50%	6.21%	6.20%	6.18%	9.56%
Avista Corporation	\$1.83	\$39.65	\$43.21	\$44.80	\$42.55	4.30%	4.00%	3.00%	5.80%	5.80%	4.65%	8.95%
CMS Energy Corporation	\$1.94	\$67.35	\$70.83	\$69.03	\$69.07	2.81%	5.87%	6.50%	8.48%	8.10%	7.24%	10.05%
Duke Energy Corporation	\$4.06	\$107.73	\$111.67	\$109.62	\$109.67	3.70%	2.17%	6.00%	5.91%	6.10%	5.05%	8.75%
Energy Corporation	\$4.30	\$117.03	\$120.18	\$115.30	\$117.50	3.66%	5.24%	4.00%	6.02%	6.10%	5.34%	9.00%
Evergy, Inc.	\$2.48	\$66.51	\$70.01	\$66.81	\$67.78	3.66%	6.82%	7.50%	4.95%	6.10%	6.34%	10.00%
IDACORP, Inc.	\$3.25	\$102.39	\$108.59	\$108.94	\$106.64	3.05%	6.64%	4.00%	4.40%	2.80%	4.46%	7.51%
NextEra Energy, Inc.	\$1.87	\$69.47	\$76.17	\$80.56	\$75.40	2.48%	10.19%	12.50%	8.85%	8.90%	10.11%	12.59%
NorthWestern Corporation	\$2.56	\$55.05	\$60.37	\$60.49	\$58.64	4.37%	2.03%	3.00%	4.50%	2.30%	2.96%	7.32%
Otter Tail Corporation	\$1.76	\$58.47	\$66.45	\$69.46	\$64.79	2.72%	6.83%	4.50%	9.00%	n/a	6.78%	9.49%
Portland General Electric Company	\$1.90	\$46.19	\$48.82	\$49.82	\$48.28	3.94%	6.20%	7.50%	3.30%	4.40%	5.35%	9.29%
Southern Company	\$2.78	\$72.54	\$75.55	\$73.14	\$73.74	3.77%	3.38%	6.50%	6.40%	4.00%	5.07%	8.84%
Xcel Energy Inc.	\$2.08	\$72.15	\$74.58	\$72.63	\$73.12	2.84%	6.40%	6.00%	7.08%	6.40%	6.47%	9.31%
MEAN						3.43%	5.52%	6.00%	6.38%	5.92%	5.97%	9.40%

Notes

- [1] Source: Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022
- [2] Source: Yahoo! Finance
- [3] Source: Yahoo! Finance
- [4] Source: Yahoo! Finance
- [5] Source: Yahoo! Finance
- [6] Equals [1] / [6]
- [7] Source: Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022
- [8] Source: Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022
- [9] Source: Yahoo! Finance
- [10] Source: Zacks
- [11] Equals Average ([7], [8], [9]), [10]
- [12] Equals [6] + [11]

HAMADA ADJUSTMENT - PAC PROXY GROUP - ADJUSTED CAPITAL STRUCTURE AND EQUITY RISK PREMIUM

Company	Ticker	Value Line			Value Line Beta	Value Line 2023 Tax Rate	2023 Unlevered Beta	2023 Relevered Beta - Equity at 52.25%	Equity Risk Premium	Hamada 2023 Adjustment - Equity at 52.25%
		[1] Cap Structure Percentages (2023) LT Debt	[2] Common Equity	[3] Preferred Stock						
ALLETE, Inc.	ALE	39.50	60.50	0.00	0.90	0.0%	0.54	1.14	7.85%	1.89%
Alliant Energy Corporation	LNT	54.00	46.00	0.00	0.80	4.0%	0.38	0.77	7.85%	0.23%
Ameren Corporation	AEE	53.50	46.00	0.50	0.80	12.0%	0.39	0.77	7.85%	0.22%
American Electric Power Company, Inc.	AEP	58.00	42.00	0.00	0.75	7.0%	0.33	0.66	7.85%	0.69%
Avista Corporation	AVA	50.00	50.00	0.00	0.95	15.0%	0.51	0.99	7.85%	0.32%
CMS Energy Corporation	CMS	63.50	35.50	1.00	0.75	11.0%	0.29	0.57	7.85%	1.45%
Duke Energy Corporation	DUK	58.50	40.00	1.50	0.85	9.0%	0.36	0.72	7.85%	1.04%
Energy Corporation	ETR	66.50	33.00	0.50	0.90	23.0%	0.35	0.65	7.85%	1.99%
Energy, Inc.	EVRG	51.50	48.50	0.00	0.90	9.0%	0.46	0.91	7.85%	0.11%
IDACORP, Inc.	IDA	48.50	51.50	0.00	0.80	13.0%	0.44	0.86	7.85%	0.46%
NextEra Energy, Inc.	NEE	56.50	43.50	0.00	0.90	11.0%	0.42	0.82	7.85%	0.60%
NorthWestern Corporation	NWE	49.50	50.50	0.00	0.95	3.0%	0.49	1.00	7.85%	0.42%
Otter Tail Corporation	OTTR	41.50	58.50	0.00	0.85	20.0%	0.54	1.02	7.85%	1.31%
Portland General Electric Company	POR	56.00	44.00	0.00	0.85	17.5%	0.41	0.79	7.85%	0.48%
Southern Company	SO	64.00	36.00	0.00	0.90	15.0%	0.36	0.69	7.85%	1.63%
Xcel Energy Inc.	XEL	58.00	42.00	0.00	0.80	0.0%	0.34	0.70	7.85%	0.76%
Mean			45.5%							0.85%

Notes

- [1] Source: Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022
- [2] Source: Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022
- [3] Equals 100% - [1] - [2]
- [4] Source: Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022
- [5] Source: Value Line Reports dated: April 22, 2022, May 13, 2022, and June 10, 2022
- [6] Equals  $[4] / (1 + (1 - [5]) \times (([1] + [3]) / [2]))$
- [7] Equals  $[6] \times (1 + (1 - [5]) \times (52.25\% / (1 - 52.25\%)))$
- [8] Source: Staff/105 Muldoon/1
- [9] Equals Absolute Value  $([8] \times ([7] - [4]))$

Stage 3 - Long-Term Annual Dividend and EPS Growth Rates			
CBO	4.00%	1	
Composite	4.62%	2	
BEA Nominal Historical	4.95%	3	
Bulkley Growth Rate	5.49%	4	

GDP GROWTH RATE INPUT	4
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**Average B.O.Y. & E.O.Y. Cash Flows**

Company	Average IRR	Terminal Value as % of NPV <sub>0-3</sub>
ALLETE, Inc.	10.0%	33.8%
Alliant Energy Corporation	8.9%	44.2%
Ameren Corporation	8.6%	46.3%
American Electric Power Company, I	9.3%	39.9%
Avista Corporation	9.9%	34.7%
CMS Energy Corporation	8.8%	47.4%
Duke Energy Corporation	9.0%	41.8%
Energy Corporation	9.6%	38.1%
Evergy, Inc.	9.9%	37.1%
IDACORP, Inc.	8.9%	40.6%
NextEra Energy, Inc.	10.1%	52.6%
NorthWestern Corporation	9.4%	35.6%
OpGen Corporation	9.7%	37.4%
Portland General Electric Company	9.8%	33.2%
Southern Company	9.5%	40.6%
Xcel Energy, Inc.	8.8%	45.7%
MEAN	9.25%	39.82%

E.O.Y. Cash Flows

[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]
Company	2019	2020	2021	2019-2021	2025-2027	Growth Rate (2019-21 - 2025-27)	GDP Growth Rate	IRR	Terminal Value as % of NPV <sub>inv</sub>	NPV @ IRR	Recent Price*	
ALLETE, Inc.	2.35	2.47	2.52	2.45	3.00	3.5%	5.49%	9.9%	34.7%	0.00	(60.33)	
Alliant Energy Corporation	3.33	3.35	3.23	3.30	4.75	6.2%	5.49%	8.9%	45.2%	0.00	(60.37)	
Ameren Corporation	1.92	2.00	2.04	2.04	3.10	5.9%	5.49%	8.7%	47.4%	0.00	(92.46)	
American Electric Power Company	3.35	3.50	3.64	3.56	5.25	6.7%	5.49%	9.2%	41.0%	(0.00)	(89.12)	
Avista Corporation	4.08	4.42	4.96	4.78	6.50	8.6%	5.49%	9.8%	35.6%	0.00	(42.55)	
CMS Energy Corporation	1.55	1.62	1.69	1.62	2.05	4.0%	5.49%	9.8%	48.4%	0.00	(69.07)	
Duke Energy Corporation	3.75	3.82	3.90	3.82	4.35	2.2%	5.49%	8.9%	42.7%	0.00	(109.67)	
Energy Corporation	5.07	5.07	5.07	5.07	6.50	5.8%	5.49%	9.5%	39.2%	0.00	(117.50)	
Evergy, Inc.	6.30	6.90	6.87	6.89	8.50	4.1%	5.49%	9.8%	38.2%	0.00	(67.78)	
IDACORP, Inc.	2.56	2.72	2.72	2.72	4.00	6.6%	5.49%	8.8%	41.7%	0.00	(106.64)	
NextEra Energy, Inc.	1.25	1.40	1.54	1.40	2.50	10.2%	5.49%	10.0%	53.7%	0.00	(75.40)	
NorthWestern Corporation	2.30	2.40	2.46	2.39	2.70	2.0%	5.49%	9.3%	36.4%	0.00	(66.64)	
Other Tail Corporation	1.30	1.46	1.56	1.48	2.00	6.8%	5.49%	7.3%	35.9%	(0.00)	(64.79)	
Portland General Electric Company	2.17	2.34	2.34	2.34	3.75	4.3%	5.49%	9.7%	34.3%	0.00	(48.28)	
Southern Company	2.46	2.54	2.62	2.54	3.10	3.4%	5.49%	9.4%	41.7%	0.00	(73.74)	
Excel Energy Inc.	1.62	1.72	1.83	1.72	2.50	6.4%	5.49%	8.7%	46.8%	0.00	(73.12)	
MEAN	2.64	2.79	2.80	2.80	4.00	6.1%	5.49%	9.15%	41.42%	0.00		

B.O.Y. Cash Flows

[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]
Company	2019	2020	2021	2019-2021	2025-2027	Growth Rate (2019-21 - 2025-27)	GDP Growth Rate	IRR	Terminal Value as % of NPV <sub>inv</sub>	NPV @ IRR	Recent Price*	
ALLETE, Inc.	2.35	2.47	2.52	2.45	3.00	3.5%	5.49%	10.1%	32.8%	0.00	(60.33)	
Alliant Energy Corporation	3.33	3.35	3.23	3.30	4.75	6.2%	5.49%	8.9%	43.1%	0.00	(60.37)	
Ameren Corporation	1.92	2.00	2.04	2.04	3.10	5.9%	5.49%	8.9%	45.2%	0.00	(92.46)	
American Electric Power Company	3.35	3.50	3.64	3.56	5.25	6.7%	5.49%	9.4%	38.9%	0.00	(89.12)	
Avista Corporation	4.08	4.42	4.96	4.49	6.50	8.6%	5.49%	10.0%	33.7%	0.00	(42.55)	
CMS Energy Corporation	2.97	3.05	3.11	3.05	4.00	2.8%	5.49%	8.9%	46.3%	0.00	(69.07)	
Duke Energy Corporation	3.75	3.82	3.90	3.82	4.35	2.2%	5.49%	9.1%	41.0%	(0.00)	(109.67)	
Energy Corporation	5.07	5.07	5.07	5.07	6.50	5.8%	5.49%	9.7%	37.1%	0.00	(117.50)	
Evergy, Inc.	6.30	6.90	6.87	6.89	8.50	4.1%	5.49%	10.1%	36.0%	0.00	(67.78)	
IDACORP, Inc.	2.79	2.72	2.72	2.72	4.00	6.6%	5.49%	9.0%	39.5%	0.00	(106.64)	
NextEra Energy, Inc.	1.25	1.40	1.54	1.40	2.50	10.2%	5.49%	10.2%	51.4%	0.00	(75.40)	
NorthWestern Corporation	2.30	2.40	2.46	2.39	2.70	2.0%	5.49%	9.5%	34.7%	0.00	(66.64)	
Other Tail Corporation	1.30	1.46	1.56	1.48	2.00	6.8%	5.49%	7.5%	33.9%	0.00	(64.79)	
Portland General Electric Company	2.17	2.34	2.34	2.34	3.75	4.3%	5.49%	10.0%	32.1%	0.00	(48.28)	
Southern Company	2.46	2.54	2.62	2.54	3.10	3.4%	5.49%	9.6%	39.9%	0.00	(73.74)	
Excel Energy Inc.	1.62	1.72	1.83	1.72	2.50	6.4%	5.49%	8.9%	44.7%	0.00	(73.12)	
MEAN	2.64	2.79	2.80	2.80	4.00	6.1%	5.49%	9.34%	39.40%	0.00		







Mr. Muldoon's Adjusted CAPM Results - Projected Risk-Free Rate and Forward-looking Market Return

Company	Ticker	Value Line Beta	CAPM ROE
ALLETE, Inc.	ALE	0.90	11.72%
Alliant Energy Corporation	LNT	0.80	10.80%
Ameren Corporation	AEE	0.80	10.80%
American Electric Power Company, Inc.	AEP	0.75	10.34%
Avista Corporation	AVA	0.95	12.17%
CMS Energy Corporation	CMS	0.75	10.34%
Duke Energy Corporation	DUK	0.85	11.26%
Entergy Corporation	ETR	0.90	11.72%
Energy, Inc.	EVERG	0.90	11.72%
IDACORP, Inc.	IDA	0.80	10.80%
NextEra Energy, Inc.	NEE	0.90	11.72%
NorthWestern Corporation	NWE	0.95	12.17%
Otter Tail Corporation	OTTR	0.85	11.26%
Portland General Electric Company	POR	0.85	11.26%
Southern Company	SO	0.90	11.72%
Xcel Energy Inc.	XEL	0.80	10.80%
MEAN			11.29%

CAPM Modeling Inputs

3.48%	Source: Blue Chip Financial Forecasts, Vol. 41, No. 6, June 1, 2022, at 2 (Near-term projected 30-year U.S. Treasury bond yield (Q3 2022 - Q3 2023))
12.63%	Source: Exhibit PAC/307
9.15%	Mkt Risk Premium (Market Return - Interest Rate)

Mr. Muldoon ROE Summary - Updated

Model Y: 3 Stage DCF - Dividend Growth with Terminal Value as Sales based upon EPS Growth and Terminal Stock Sale								
Y	CBO	4.00%	Composite	4.62%	Historical	4.95%	PAC	5.49%
Bulkley Proxy Group		8.09%	8.58%		8.83%		9.25%	

Model Y: 3 Stage DCF - Dividend & EPS Growth with Terminal Value as Stock Sale (Hamada Adjusted)								
Y	CBO	4.00%	Composite	4.62%	Historical	4.95%	PAC	5.49%
Bulkley Proxy Group		8.94%	9.42%		9.68%		10.10%	

Best Fit Range of Reasonable ROEs      9.68%      to      10.10%      ROE

Common Stock Flotation Costs Adjustment Shifts Range of Reasonable ROE's Upward by :      **12.5 bps**

   9.80%      to      10.22%      ROE

Staff Point ROE Recommendation:      Midpoint      10.0%      ROE      Testimony

Docket No. UE 399  
Exhibit PAC/1403  
Witness: Ann E. Bulkley

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Ann E. Bulkley  
Adjustments to Gorman's Risk Premium Analysis

July 2022

### Gorman As-Filed Bond Yield Plus Risk Premium Analysis

Description	Amount
(a)	(b)
<u>Treasury Bond Approach</u>	
Near-Term Projected 30-Year Treasury Bond Yield (as of Apr 1, 2022)	3.30%
Treasury Bond Risk Premium (avg 1986-2021)	5.70%
<b>Bond Yield Plus Risk Premium</b>	<b>9.00%</b>
 <u>Utility Bond Approach</u>	
A-Rated Utility Bond Yield (13 week avg thru April 11, 2022)	3.83%
5-Yr Rolling Avg Risk Premium (maximum)	5.90%
Gorman Weighting	75.00%
5-Yr Rolling Avg Risk Premium (minimum)	2.88%
Gorman Weighting	25.00%
Wgtd. Utility Bond Yield Risk Premium	5.15%
<b>Bond Yield Plus Risk Premium</b>	<b>8.98%</b>

**Gorman Adjusted Bond Yield Plus Risk Premium Analysis**  
**(75/25 Weighting for Treasury Bond Approach; and**  
**Most Recent Yields for Treasury Bond and Utility Bond Approaches)**

Description (a)	Amount (b)
<u>Treasury Bond Approach</u>	
Near-Term Projected 30-Year Treasury Bond Yield (as of Jun 1, 2022)	3.60%
5-Yr Rolling Avg Risk Premium (maximum)	7.09%
Adjusted Weighting	75.00%
5-Yr Rolling Avg Risk Premium (minimum)	4.25%
Adjusted Weighting	25.00%
Wgtd. Utility Bond Yield Risk Premium	6.38%
<b>Bond Yield Plus Risk Premium</b>	<b>9.98%</b>
<u>Utility Bond Approach</u>	
A-Rated Utility Bond Yield (13 week avg thru June 17, 2022)	4.55%
5-Yr Rolling Avg Risk Premium (maximum)	5.90%
Gorman Weighting	75.00%
5-Yr Rolling Avg Risk Premium (minimum)	2.88%
Gorman Weighting	25.00%
Wgtd. Utility Bond Yield Risk Premium	5.15%
<b>Bond Yield Plus Risk Premium</b>	<b>9.70%</b>

**Gorman Adjusted Bond Yield Plus Risk Premium Analysis**  
**(Maximum 5-Year Avg for Treasury Bond and Utility Bond Approaches; and**  
**Most Recent Yields for Treasury Bond and Utility Bond Approaches)**

Description (a)	Amount (b)
<u>Treasury Bond Approach</u>	
Near-Term Projected 30-Year Treasury Bond Yield (as of Jun 1, 2022)	3.60%
5-Yr Rolling Avg Risk Premium (maximum)	7.09%
Adjusted Weighting	100.00%
5-Yr Rolling Avg Risk Premium (minimum)	4.25%
Adjusted Weighting	0.00%
Wgtd. Utility Bond Yield Risk Premium	7.09%
<b>Bond Yield Plus Risk Premium</b>	<b>10.69%</b>
<u>Utility Bond Approach</u>	
A-Rated Utility Bond Yield (13 week avg thru June 17, 2022)	4.55%
5-Yr Rolling Avg Risk Premium (maximum)	5.90%
Adjusted Weighting	100.00%
5-Yr Rolling Avg Risk Premium (minimum)	2.88%
Adjusted Weighting	0.00%
Wgtd. Utility Bond Yield Risk Premium	5.90%
<b>Bond Yield Plus Risk Premium</b>	<b>10.45%</b>

Docket No. UE 399  
Exhibit PAC/1404  
Witness: Ann E. Bulkley

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Ann E. Bulkley  
Adjustments to Gorman's CAPM Analysis

July 2022



### Gorman As-Filed CAPM Analysis

Description	Notes	Current Mkt Risk Premium	Normalized Mkt Risk Premium
(a)	(b)	(c)	(d)
Risk Free Rate	[1]	2.37%	3.30%
Market Return			
Long-term historical avg. real return on S&P 500	[2]	9.20%	9.20%
Projected inflation	[3]	2.60%	2.60%
Market Return	[4]	12.04%	12.04%
Market Risk Premium	[5]	9.67%	8.74%
Beta	[6]	0.73	0.73
<b>CAPM Result</b>	[7]	<b>9.45%</b>	<b>9.70%</b>

- [1] Column (b): 30-year Treasury yield as of end of March 2022;  
 Column (c): near-term projected 30-year Treasury yield as reported by  
*Blue Chip Financial Forecasts*, April 1, 2022
- [2] Kroll; historical average from 1926-2021
- [3] Projected Consumer Price Index as reported by Blue Chip Financial  
 Forecasts, April 1, 2022.
- [4]  $((1+9.20%)*(1+2.60%))-1$
- [5] Market return - risk free rate
- [6] *Value Line* long-term average beta for proxy group
- [7] Risk-free rate + (market return \* beta)

**Gorman As-Adjusted CAPM Analysis  
(Reflects Updated Risk Free Rate Only)**

Description	Notes	Current Mkt Risk Premium	Normalized Mkt Risk Premium
(a)	(b)	(c)	(d)
Risk Free Rate	[1]	3.39%	3.60%
Market Return			
Long-term historical avg. real return on S&P 500	[2]	9.20%	9.20%
Projected inflation	[3]	2.60%	2.60%
Market Return	[4]	12.04%	12.04%
Market Risk Premium	[5]	8.65%	8.44%
Beta	[6]	0.73	0.73
<b>CAPM Result</b>	[7]	<b>9.72%</b>	<b>9.78%</b>

- [1] Column (b): 30-year Treasury yield as of **June 15, 2022**;  
Column (c): near-term projected 30-year Treasury yield as reported by  
*Blue Chip Financial Forecasts*, **June 1, 2022**
- [2] Kroll; historical average from 1926-2021
- [3] Projected Consumer Price Index as reported by Blue Chip Financial  
Forecasts, April 1, 2022.
- [4]  $((1+9.20%)*(1+2.60%))-1$
- [5] Market return - risk free rate
- [6] *Value Line* long-term average beta for proxy group
- [7] Risk-free rate + (market return \* beta)

**Gorman As-Adjusted CAPM Analysis  
(Reflects Updated Current Betas of Proxy Group Only)**

Description	Notes	Current Mkt Risk Premium	Normalized Mkt Risk Premium
(a)	(b)	(c)	(d)
Risk Free Rate	[1]	2.37%	3.30%
Market Return			
Long-term historical avg. real return on S&P 500	[2]	9.20%	9.20%
Projected inflation	[3]	2.60%	2.60%
Market Return	[4]	12.04%	12.04%
Market Risk Premium	[5]	9.67%	8.74%
Beta	[6]	0.88	0.88
<b>CAPM Result</b>	[7]	<b>10.88%</b>	<b>10.99%</b>

- [1] Column (b): 30-year Treasury yield as of end of March 2022;  
Column (c): near-term projected 30-year Treasury yield as reported by  
*Blue Chip Financial Forecasts*, April 1, 2022
- [2] Kroll; historical average from 1926-2021
- [3] Projected Consumer Price Index as reported by Blue Chip Financial  
Forecasts, April 1, 2022.
- [4]  $((1+9.20%)*(1+2.60%))-1$
- [5] Market return - risk free rate
- [6] *Value Line* **current** average beta for proxy group
- [7] Risk-free rate + (market return \* beta)

**Gorman As-Adjusted CAPM Analysis**  
**(Reflects Updated Risk Free Rate and Current Beta of Proxy Group)**

Description	Notes	Current Mkt Risk Premium	Normalized Mkt Risk Premium
(a)	(b)	(c)	(d)
Risk Free Rate	[1]	3.39%	3.60%
Market Return			
Long-term historical avg. real return on S&P 500	[2]	9.20%	9.20%
Projected inflation	[3]	2.60%	2.60%
Market Return	[4]	12.04%	12.04%
Market Risk Premium	[5]	8.65%	8.44%
Beta	[6]	0.88	0.88
<b>CAPM Result</b>	[7]	<b>11.00%</b>	<b>11.03%</b>

- [1] Column (b): 30-year Treasury yield as of **June 15, 2022**;  
Column (c): near-term projected 30-year Treasury yield as reported by  
*Blue Chip Financial Forecasts*, **June 1, 2022**
- [2] Kroll; historical average from 1926-2021
- [3] Projected Consumer Price Index as reported by Blue Chip Financial  
Forecasts, April 1, 2022.
- [4]  $((1+9.20%)*(1+2.60%))-1$
- [5] Market return - risk free rate
- [6] *Value Line* **current** average beta for proxy group
- [7] Risk-free rate + (market return \* beta)

**REDACTED**

Docket No. UE 399

Exhibit PAC/1500

Witness: Michael G. Wilding

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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**REDACTED**

Reply Testimony of Michael G. Wilding

July 2022

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1 **Q. Are you the same Michael G. Wilding who previously submitted direct testimony**  
2 **in this proceeding on behalf of PacifiCorp d/b/a Pacific Power (PacifiCorp or the**  
3 **Company)?**

4 A. Yes.

5 **I. PURPOSE AND SUMMARY OF TESTIMONY**

6 **Q. What is the purpose of your reply testimony in this proceeding?**

7 A. I respond to the opening testimony of Moya Enright, filed on behalf of Staff,  
8 William Gehrke, filed on behalf of the Oregon Citizens' Utility Board (CUB), and  
9 Bradley G. Mullins, on behalf of the Alliance of Western Energy Consumers  
10 (AWEC).

11 **Q. Please summarize your testimony.**

12 A. Through my testimony, I address the following issues:

- 13 • I explain that PacifiCorp agrees with Staff's recommendations regarding the  
14 rate year update and the inclusion of hydrological forecasts in the transition  
15 adjustment mechanism (TAM) proceeding.
- 16 • I provide feedback on Staff's proposed changes to the TAM Guidelines.  
17 Specifically, I provide some tweaks to Staff's edit on how corrections should  
18 be handled and request additional information from Staff on the specific  
19 workpapers/filing information that would be helpful to them that the Company  
20 can provide.
- 21 • I respond to Staff, AWEC, and CUB's arguments regarding the Power Cost  
22 Adjustment Mechanism (PCAM) and explain why these changes to the PCAM  
23 are necessary and appropriate. I discuss how the fundamental risk balance has  
24 shifted since implementation of the PCAM and how this has resulted in a  
25 systemic bias and has not resulted in the PCAM being revenue neutral.  
26 PacifiCorp has proposed modest changes that will help alleviate this issue.
- 27 • I address CUB and AWEC's arguments on the rate year update and the  
28 hydrological update and explain why these changes will result in more  
29 accurate net power costs (NPC) for customers.
- 30 • Finally, I respond to AWEC's proposed changes to the TAM guidelines and  
31 detail how these proposed changes would increase the administrative burden

1 on the Company and stakeholders while providing minimal benefits to the  
2 TAM.

3 **II. REPLY TO STAFF**

4 **A. PacifiCorp's proposed changes to the TAM**

5 **Q. Staff recommends that PacifiCorp be allowed to incorporate a rate year update**  
6 **into the TAM but raises concerns about the administrative burdens of this**  
7 **proposal.<sup>1</sup> How do you respond?**

8 A. PacifiCorp shares Staff's concerns about the administrative burden of the rate year  
9 update and would like to ensure it is as minimally burdensome as possible for both  
10 stakeholders and the Company. PacifiCorp agrees that limiting the changes in the  
11 rate year update to those described in PacifiCorp's direct testimony supports this  
12 goal.

13 **Q. How is the Company proposing to handle concurrent filings on March 1st in a**  
14 **combined GRC and TAM year?**

15 A. In light of the administrative issues of making multiple power cost filings on the same  
16 day, the Company is proposing to file the Rate-Year Update on April 1st in the years  
17 when the Company concurrently files a GRC and a TAM on March 1st. The rate-year  
18 update filing will be done on March 1st in all other years.

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<sup>1</sup> Staff/900, Enright/9.



1 **Q. Staff recommends approval of PacifiCorp’s proposal to include rate year hydro**  
2 **data for its forecast but requests additional information on the use of “Seasonal**  
3 **Outlooks for Temperature and Precipitation...for December if it’s warranted.”<sup>2</sup>**  
4 **Can you provide information on how this process would work?**

5 A. The National Weather Service (NWS) Climate Prediction Center (CPC) schedules the  
6 monthly release of long-lead seasonal outlooks for temperature and precipitation.

7 The long-lead seasonal outlooks forecast temperature and precipitation for the  
8 following month and forecasts at a rolling three-month time step out through the  
9 following 15 months. For example, the CPC’s most recent long-lead seasonal  
10 outlook released on June 16, 2022, forecasts temperature and precipitation for  
11 July 2022 and at rolling three-month time steps through July-September 2023.<sup>3</sup>

12 The long-lead outlooks identify in map form regions of the United States for which  
13 above/below normal temperature and precipitation are forecast, along with a  
14 categorization of probability for the above/below normal conditions.

15 PacifiCorp is proposing to use the temperature and precipitation outlooks in the  
16 November-released CPC long-lead seasonal outlook to inform the water supply  
17 forecast for the following December. The Company recognizes the likely role of  
18 subjectivity in evaluating whether adjustment for the following December’s water  
19 supply forecast is warranted. In making this evaluation, the Company expects to  
20 consider multiple factors, including, but not limited to:

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<sup>2</sup> Staff/900, Enright/10.

<sup>3</sup> *Three Month Outlook*, CLIMATE PREDICTION CENTER, NATIONAL WEATHER SERVICE, NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION, *available at* [https://www.cpc.ncep.noaa.gov/products/predictions/long\\_range/seasonal.php?lead=13](https://www.cpc.ncep.noaa.gov/products/predictions/long_range/seasonal.php?lead=13).

1 • The trend through November evident in the NWRFC 12-month water supply  
2 forecast

3 • Historic range in water supply for December

4 • Probability categorization of the above/below normal conditions forecast

5 The Company expects that written explanation will be included in the Final Update  
6 filing providing the basis for adjusting (or not) the December water supply forecast.

7 **Q. Staff additionally proposes that this change be allowed in the 2024 TAM subject**  
8 **to review in the 2024 and 2025 TAM.<sup>4</sup> Does PacifiCorp accept this**  
9 **recommendation?**

10 A. Yes, PacifiCorp supports this recommendation from Staff for the hydrological update  
11 to be provisional for the 2024 and 2025 TAM, with final approval of this change  
12 occurring in the 2025 TAM. Additionally, holding a workshop in mid-March 2024  
13 would allow parties to review the operation and data that has been used in the TAM  
14 and evaluate PacifiCorp’s proposal.

15 **Q. Staff would like a new edit to the TAM Guidelines that requires the Company to**  
16 **notify the Parties “within 5 business days of the correction or omission being**  
17 **identified by the Company. The Company will file corrected versions of any**  
18 **associated testimony, forecasts, workpapers, documents, and/or data responses**  
19 **within 10 business days of the correction or omission being identified.”<sup>5</sup> Is this**  
20 **edit to the TAM guidelines acceptable to PacifiCorp?**

21 A. This edit is generally acceptable. PacifiCorp understands that Staff is seeking better  
22 communication on the errors or omissions in the TAM filing and supports Staff’s goal

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<sup>4</sup> Staff/900, Enright/11.

<sup>5</sup> Staff/900, Enright/14.

1 here. However, PacifiCorp has a few minor tweaks to Staff's language. First,  
2 PacifiCorp is fine with updating any forecasts and workpapers, however filing revised  
3 testimony and updating any relevant data responses could be an extremely difficult  
4 and burdensome task. Therefore, to relieve the administrative burden on the  
5 Company, and with the TAM usually having five rounds of testimony and upwards of  
6 three hundred data requests (without counting subparts of questions), PacifiCorp feels  
7 that updating testimony and data responses is both too burdensome and unnecessary.

8 Additionally, it is very possible that updating the forecast and workpapers for  
9 certain errors that may have been identified could take longer than the ten business  
10 days identified by Staff. As a result, PacifiCorp has proposed language that states that  
11 if corrected forecasts and workpapers cannot be provided within the ten-business day  
12 timeframe, PacifiCorp would identify this limitation and provide an alternate timeline  
13 for providing the information.

14 **Q. Do you have revised language on Staff's proposed edit #1 to the TAM**  
15 **guidelines?**

16 **A.** Yes, I would propose the following revised language to Staff's proposed edit #1:

17 In any TAM proceeding, the Company has a continuing obligation  
18 to provide notice of any correction or omission promptly after the  
19 discovery of the error or new information. In addition, the Company  
20 will file a letter regarding any corrections or omissions to the  
21 components included in the Initial filing within 5 business days of  
22 the correction or omission being identified by the Company. The  
23 Company will file corrected versions of any associated forecasts,  
24 workpapers, or other documents within 10 business days of the  
25 correction or omission being identified. In the event that corrected  
26 versions of any associated forecasts, workpapers or other documents  
27 cannot be provided in 10 business days, the Company will identify  
28 such limitation, including the reason, in the letter and provide an  
29 alternate timeline for providing that information.  
30

1 **Q. Staff additionally would like an edit to the TAM Guidelines to require all**  
2 **“workpapers and all supporting documents underlying each of the Company’s**  
3 **models or adjustments[.]”<sup>6</sup> Does PacifiCorp understand Staff’s request?**

4 A. No, the request is not clear as PacifiCorp already provides all workpapers supporting  
5 any adjustments and any sensitivities that are performed in the initial TAM filing.

6 This includes over 375 spreadsheets, and data totaling about 4.25 gigabytes over the  
7 course of concurrent, five-day, fifteen day, and thirty-day workpapers. Additionally,  
8 through the step-log, PacifiCorp conducts a sensitivity on the impact of each and  
9 every adjustment that is proposed by the Company and provides the complete  
10 workpapers for those sensitivities. Staff only explains that they are required to issue  
11 data requests for “even the most basic data and models underlying the Company’s  
12 forecasts and testimony.”<sup>7</sup> However, Staff provides no specific examples, and  
13 PacifiCorp does provide workpapers and spreadsheets detailing all the information  
14 that is provided in the initial filing. If there is specific additional information that  
15 Staff would like to receive in the initial filing, PacifiCorp would appreciate if Staff  
16 could identify that information, so PacifiCorp can determine our ability to provide  
17 that information. PacifiCorp would like to be responsive to the requests of Staff and  
18 intervenors, but it is necessary for us to understand exactly what Staff is looking for.

19 In the alternative, PacifiCorp would propose holding a workshop after filing  
20 the 2024 TAM, where PacifiCorp could identify and discuss the structure of  
21 PacifiCorp’s workpapers.

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<sup>6</sup> Staff/900, Enright/14.

<sup>7</sup> Staff/900, Enright/15.

1 **B. Changes to the PCAM**

2 **Q. In PacifiCorp’s initial testimony, the Company addressed the Commission’s**  
3 **concern from the last general rate case that “PacifiCorp has not demonstrated a**  
4 **fundamental change in the risk balance between customers and the company**  
5 **that occurs with its power costs.”<sup>8</sup> Does Staff provide any rebuttal to the**  
6 **evidence that PacifiCorp has provided on that change in the risk balance?**

7 A. No, Staff simply dismisses the testimony and data provided by PacifiCorp by “stating  
8 the Company has not provided any tangible evidence to this effect.”<sup>9</sup> Staff goes on to  
9 suggest that PacifiCorp provide evidence in the form of multiple iterations of power  
10 forecasting runs or Monte Carlo simulations.<sup>10</sup> Simply dismissing and ignoring the  
11 evidence that PacifiCorp has provided to support the shifts in the power cost  
12 environment does not rebut the fact that those shifts are happening. As Figure 1 and  
13 Table 1 below illustrate, there is a trend in under-recovery of PacifiCorp’s incurred  
14 NPC costs to serve customers.

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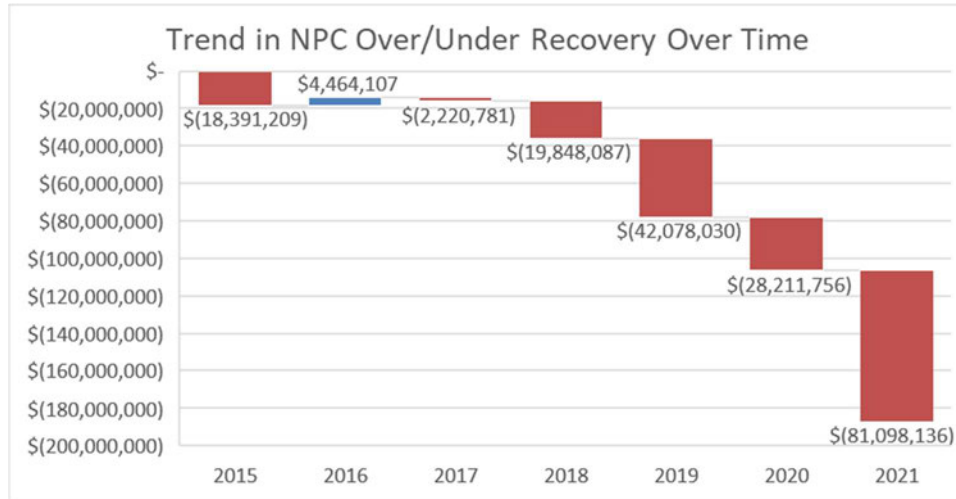
<sup>8</sup> *In the Matter of PacifiCorp d/b/a Pacific Power, Request for a General Rate Revision*, Docket No. UE 374, Order No. 20-473 at 129 (Dec. 18, 2020).

<sup>9</sup> Staff/900, Enright/21.

<sup>10</sup> *Id.*

1  
2

**FIGURE 1**  
**Oregon NPC Collected in Rates versus Actual NPC<sup>11</sup>**



3  
4

**TABLE 1**  
**Oregon NPC Collected in Rates versus Actual NPC<sup>12</sup>**

Year	NPC Collected Through Rates	Actual NPC	Over/(Under) Recovery of NPC (\$)	Over/(Under) Recovery of NPC (%)
2015	\$343,993,011	\$362,384,220	\$(18,391,209)	(5)%
2016	\$347,055,570	\$342,591,463	\$4,464,107	1%
2017	\$340,640,219	\$342,861,000	\$(2,220,781)	(1)%
2018	\$334,683,850	\$354,531,937	\$(19,848,087)	(6)%
2019	\$340,850,405	\$382,928,436	\$(42,078,030)	(11)%
2020	\$307,368,806	\$335,580,562	\$(28,211,756)	(8)%
2021	\$281,150,581	\$362,248,716	\$(81,098,136)	(22)%

5

*Note:* Beginning in 2017, PTCs have been included in the TAM and NPC.

<sup>11</sup> The calculation of 2016 actual NPC used for the analysis performed in this testimony does not include certain coal costs that were excluded in the TAM. The exclusion of these costs from actual NPC shows a small over-recovery of NPC in 2016. If these costs were included in actual NPC, it would show a small under-recovery in 2016.

<sup>12</sup> See footnote 11 above.

1 **Q. What is PacifiCorp’s interpretation of the risk balance between customers and**  
2 **the Company that the Commission makes reference to in the last general rate**  
3 **case?<sup>13</sup>**

4 A. The risk balance between customers and PacifiCorp is a measure of the distribution of  
5 power cost risk between PacifiCorp and customers that arises from the PCAM's  
6 deadbands, sharing bands, and earnings test structure.

7 **Q. From a qualitative perspective, what is the current distribution of risk between**  
8 **the customers and PacifiCorp**

9 A. The PCAM's structure ensures that the distribution of risk between the customers and  
10 PacifiCorp is always in the customer's favor.

11 **Q. Please elaborate on how the structure of the PCAM ensures that the distribution**  
12 **of risk results in a systemic bias against the Company and does not achieve**  
13 **revenue neutrality.**

14 A. The PCAM design, by its nature, guarantees that PacifiCorp will almost always  
15 accrue the risk of NPC under-recovery. That is to say, the nature of the PCAM will  
16 almost always guarantee an under-forecast of NPC.

17 Firstly, Parties are incentivized to advocate for changes in the TAM's NPC  
18 forecast that force an under-recovery at the edge of the \$30 million deadband so that  
19 customer rates are kept low, without triggering the PCAM. The drivers of this  
20 behavior are twofold. 1) There is no potential for customer outrage if the costs of  
21 PacifiCorp’s under-recovery are borne solely by the Company. 2) Related to the first,

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<sup>13</sup> *In the Matter of the Application of PacifiCorp d/b/a Pacific Power, Request for a General Rate Revision*, Docket UE 374, Order No. 20-473 at 129 (Dec. 18, 2020) (“PacifiCorp has not demonstrated a fundamental change in the risk balance between customers and the company that occurs with its power costs, and PacifiCorp has not shown that a redesign is necessary.”).

1 there is an incorrect and pervasive belief among Parties that PacifiCorp, by virtue of  
2 being owned by Berkshire Hathaway Inc., is immune from economic harm.<sup>14</sup>

3 Secondly and conversely, on first impression PacifiCorp would be  
4 incentivized to advocate for changes in the TAM's NPC forecast that force an  
5 over-recovery of power costs. However, competition for customers, public relations,  
6 and the Company's own corporate principles to drive down operating and  
7 maintenance costs would be adversely impacted by unrefunded over-recovery,  
8 PacifiCorp is therefore incentivized to advocate for changes in the TAM's NPC  
9 forecast that result in an accurate forecast of NPC, with neither under nor over-  
10 recovery.

11 Thirdly, with Parties incentivized for PacifiCorp to under-forecast NPC and  
12 with PacifiCorp incentivized to accurately forecast NPC, any settlement or litigation  
13 is guaranteed to result in an unfavorable compromise wherein neither Parties nor  
14 PacifiCorp achieve their incentive, but instead a balance between competing interests  
15 is struck and the Company under-recovers somewhere in the middle of the  
16 \$30 million deadband.

17 **Q. How do these incentives affect the risk balance between customers and the**  
18 **Company?**

19 A. The competing incentives which result in compromises that lead to persistent  
20 under-recoveries of NPC create a lopsided distribution of risk between the customers  
21 and PacifiCorp that is always in the customer's favor.

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<sup>14</sup> Staff/100, Muldoon/14.



1 **Q. What should be the distribution of risk between the customers and PacifiCorp?**

2 A. The distribution of risk should be one in which PacifiCorp is revenue neutral and  
3 neither customer nor PacifiCorp is systemically biased against from a power cost  
4 perspective.

5 **Q. Has the risk balance between the customers and the Company fundamentally**  
6 **changed since the PCAM's inception?**

7 A. Yes. As discussed in my direct testimony, when the PCAM was first implemented  
8 NPC was more controllable as a larger percentage of load was served by coal-fired  
9 resources where fuel costs could be controlled through long-term coal supply  
10 agreements. However, since that time, the following changes have occurred at  
11 PacifiCorp and in the west to fundamentally alter the balance of risk:

- 12 • The change in PacifiCorp's resource mix to favor renewable resources results  
13 in more intermittent generation;<sup>15</sup>
- 14 • Market prices across the region are reflecting the volatility inherent in the  
15 region's resource mix;<sup>16</sup>
- 16 • The load composition of PacifiCorp has shifted more towards residential and  
17 commercial load, which is more volatile than industrial load;<sup>17</sup>
- 18 • NPC is more difficult to forecast as a result of this increased volatility in market  
19 prices, the generation portfolio, and load;<sup>18</sup>
- 20 • Hedging power costs has become more complex because of the new levels of  
21 volatility observed due to the aforementioned factors.<sup>19</sup>

22 PacifiCorp's potential for revenue neutrality has always been systemically biased by  
23 the structure of the PCAM. However, as NPC have undisputedly become less

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<sup>15</sup> PAC/400, Wilding/13-17.

<sup>16</sup> PAC/400, Wilding/17-18.

<sup>17</sup> PAC/400, Wilding/18-20.

<sup>18</sup> PAC/400, Wilding/20-21.

<sup>19</sup> PAC/400, Wilding/21-22.

1 controllable and harder to forecast, the risk balance has shifted further in the  
2 customers' favor and is undeniably different than it was when the PCAM was  
3 designed.

4 **Q. In light of the PCAM's systemic bias against the Company's revenue neutrality,**  
5 **is a redesign of the PCAM necessary?**

6 A. Yes, but Parties have no incentive to eliminate the bias.

7 **Q. Staff contends that PacifiCorp's proposal destroys "ratepayer protections" in**  
8 **the PCAM instead of "resolving the recognized failings of its TAM forecast."<sup>20</sup>**

9 **How do you respond?**

10 A. First, "ratepayer protections" is a misnomer. The PCAM was intended to provide the  
11 Company with the opportunity to recover its prudently incurred NPC in a revenue  
12 neutral manner over a period of time.<sup>21</sup> Variances between the NPC forecast in the  
13 TAM and actual NPC are to be expected, and the PCAM was designed with the  
14 intention of customers and the Company sharing the forecast risk of the TAM. In  
15 other words, the expectation was that some years the TAM forecast would be higher  
16 than actuals and other years it would be lower than actuals, but over-time the  
17 over- and under-collections of NPC by the Company would even out. However, as  
18 seen in Figure 1 and Table 1 above the forecast risk has been overwhelmingly borne  
19 by the Company.

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<sup>20</sup> Staff/900, Enright/24.

<sup>21</sup> *In the Matter of PacifiCorp d/b/a Pacific Power, Request for a General Rate Revision*, Docket No. UE 246, Order No. 12-493 at 13 (Dec. 20, 2012).

1           Second, PacifiCorp has continually sought to increase the accuracy of the  
2 TAM forecast. However, the modeling improvements made by the Company in the  
3 TAM are almost always met with resistance from Staff and other intervenors.

4           Lastly, PacifiCorp is not proposing to destroy “ratepayer protections”. Rather,  
5 PacifiCorp is simply seeking nominal changes to the mechanism to ensure that it has  
6 a better chance to recover prudently incurred NPC. Parties will always have a chance  
7 to review PacifiCorp’s actual NPC through the PCAM and propose disallowances if  
8 they determine any of those costs are not prudent.

9 **Q. Staff has further determined that PacifiCorp’s claims are “merely the business**  
10 **risk of operating a utility in 2022. With a rate base of \$4.554 billion, the**  
11 **Company also has significantly higher capacity to absorb variations in power**  
12 **costs.”<sup>22</sup> How do you respond?**

13 A. As I noted above, the incentive structure of the PCAM is misaligned, and it is not  
14 normal business risk for the Company to continuously absorb reductions on prudently  
15 incurred NPC as intervenors continually try to reduce NPC in the TAM. Staff’s  
16 argument rests on the premise that PacifiCorp’s rate base is larger so then it is  
17 appropriate to reduce the Company’s ability to recover prudently incurred costs by  
18 increasing the deadbands of the PCAM to match rate base. The Company fails to see  
19 the logic in this argument. PacifiCorp’s proposal to revise the PCAM structure is a  
20 modest step to address the glaring inequity in the distribution of risk under the current  
21 PCAM.

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<sup>22</sup> Staff/900, Enright/24.

1 **Q. Staff additionally contends that the current PCAM structure has “outdated**  
2 **deadbands” that allow PacifiCorp to “supplement” its 2021 income by \$10.244**  
3 **million through 2023 rates.<sup>23</sup> How do you respond?**

4 A. Staff’s argument is absurd, PacifiCorp incurred \$80 million in NPC above the TAM  
5 forecast to serve Oregon customers in 2021, and because of the operation of the  
6 PCAM, PacifiCorp is being forced to forego \$30 million. These are actual costs  
7 incurred to serve customers, there is no “supplement” to PacifiCorp’s income, only a  
8 denial of actual costs.

9 **Q. Staff proposes symmetric deadbands of \$30 million for the PCAM.<sup>24</sup> How do you**  
10 **respond?**

11 A. Staff’s recommendation may appear reasonable, but is mostly useless in practice. As  
12 Figure 1 above depicts, the incentives and functioning of the TAM and the PCAM  
13 result in continuous under-recovery, and changing the asymmetric deadband to a  
14 symmetric deadband of \$30 million will likely have no impact on addressing the  
15 issues that PacifiCorp has identified or restoring the risk balance.

16 **Q. Staff additionally opposes PacifiCorp’s proposal to recover extraordinary costs**  
17 **in certain months outside of the established deadbands, sharing bands and**  
18 **earnings test.<sup>25</sup> How do you respond?**

19 A. Staff’s opposition reflects the double-standard that is being promoted by intervenors  
20 in PacifiCorp’s NPC cases. Staff proposed removing Qualifying Facility (QF) costs  
21 from the PCAM mechanism and for those costs to operate on a pass-through

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<sup>23</sup> Staff/900, Enright/23.

<sup>24</sup> Staff/900, Enright/25.

<sup>25</sup> Staff/900, Enright/22.

1 mechanism that operates outside the deadbands, sharing bands, and earnings test.  
 2 Staff has identified a single element of over-forecast and sought to remove it from the  
 3 operation of the PCAM. However, as PacifiCorp has noted in this year’s TAM  
 4 testimony, “when examined within the context of wholesale sales, other sources of  
 5 generation and within the overall context of NPC it becomes apparent that the QF  
 6 forecasts are relatively accurate and in least need of improvement.”<sup>26</sup> This is  
 7 identified in Confidential Table 2 below which shows the variation in other elements  
 8 of the PCAM.

9 **Confidential Table 2**

Difference between Forecast and Actuals (%)
[REDACTED]

10 **Q. What justification does Staff provide for its proposal for actual QF costs to be**  
 11 **recovered by the Company without being subject to the deadbands, sharing**  
 12 **bands, and earnings test in the PCAM?**

13 **A.** Staff points out that “QF costs are generally higher than self-generation and market  
 14 purchases” and that “Oregon-regulated electric utilities are required to buy power

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<sup>26</sup> *In the Matter of PacifiCorp d/b/a Pacific Power, 2023 Transition Adjustment Mechanism*, Docket No. UE 400, PAC/600, Mitchell/61 (Jun. 22, 2022).

1 from QFs at rates established by the Commission” therefore a “pass-through approach  
2 appropriately absolves the Company of any price or volumetric risk associated with  
3 its QF purchases.”<sup>27</sup>

4 **Q. Does PacifiCorp support Staff’s proposal on the treatment of QF costs in the**  
5 **PCAM?**

6 A. Yes. The Company believes that it is just and reasonable for customers to pay the  
7 prudent power costs incurred to serve load, and that all costs included in the TAM  
8 should true-up to actuals without application of the deadbands, sharing bands, and  
9 earnings test. However, for this QF proposal to work in practice, the methodology  
10 would need to be modified to fit PacifiCorp’s wider geographical footprint.

11 In the TAM, PacifiCorp would forecast QF generation using a four-year  
12 moving average of historical QF generation, where possible, while also including new  
13 QFs with CODs in the test year, after the application of the contract delay rate.

14 In the PCAM, the actual QF generation compared to the forecasted QF  
15 generation would be valued at the difference between the QFs’ contract price and the  
16 actual settled day-ahead power price at the trading hub most applicable to each  
17 individual QF. The resulting surplus or deficit would be passed through as either a  
18 charge or a refund to customers. The price for the applicable trading hub would be  
19 scaled to the hourly granularity consistent with the hourly scaling methodology  
20 applied to the OFPC in the TAM.

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<sup>27</sup> Staff/900, Enright/26-27, 29.

1 **Q. Are there other items from the TAM that would benefit from a similar PCAM**  
2 **treatment?**

3 A. Yes, wholesale sales revenue and the costs associated with renewable generation.

4 Wholesale sales volumes have historically been over-forecast by [REDACTED] and the  
5 associated wholesale sales revenue by [REDACTED]. The impact of the forecast error of  
6 wholesales sales far exceeds the forecast error associated with QF costs.

7 Additionally, because wholesale sales revenues cause NPC to decrease, this creates  
8 the incentive for parties to support a higher forecast of wholesale sales. This  
9 treatment of wholesale sales revenue would remove the misaligned incentive and  
10 correct the forecast error.

11 The costs associated with renewable generation should also garner the same  
12 treatment as QFs. Similar to how the Company is required to purchase QF output,  
13 Oregon law sets standards for renewable generation and ensures the recovery of all  
14 prudently incurred costs for complying with those requirements.<sup>28</sup>

### 15 III. REPLY TO AWEC AND CUB

16 A. **Changes to the TAM structure**

17 **Q. AWEC opposes PacifiCorp's Rate Year Update because it would "increase rate**  
18 **variability and increase uncertainty for customers."**<sup>29</sup> **CUB also opposes this**  
19 **update because it would "increase the frequency of TAM rate changes."**<sup>30</sup> **Do**  
20 **you agree?**

21 A. Not necessarily, while there may be increased rate variability in the operation of the

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<sup>28</sup> ORS 469A.120.

<sup>29</sup> AWEC/100, Mullins/28.

<sup>30</sup> CUB/200, Gehrke/2.

1 TAM as a result of the rate year update, the end-result will be a more accurate  
2 forecast for customers. As the Commission has noted in the past, the goal of the TAM  
3 “is to achieve an accurate forecast of PacifiCorp’s [NPC] for the upcoming year.”<sup>31</sup>

4 **Q. CUB additionally argues that this is an opportunity for “less regulatory scrutiny**  
5 **for power cost changes.”<sup>32</sup> Is this true?**

6 A. No, I think CUB may misunderstand PacifiCorp’s proposal. PacifiCorp is not  
7 proposing a whole new round of testimony and litigation with major changes to the  
8 TAM. As I noted above, PacifiCorp is seeking an administratively efficient rate year  
9 update that is very limited in scope to the same elements that would be updated in the  
10 indicative and final updates which are already a part of the TAM. Those updates  
11 already occur on an expedited basis and there is a process outlined in the TAM  
12 guidelines for contesting issues in those updates. Additionally, PacifiCorp has agreed  
13 to Staff’s proposals to ensure that this is an administratively efficient update.

14 **Q. AWEC additionally contends that this rate-year update would “balloon into an**  
15 **unwieldy process in which intervenors are litigating aspects of the coming**  
16 **year’s filing, at the same time as investigating the accuracy of the prior-year’s**  
17 **update during the mid-year update process.”<sup>33</sup> Do you agree?**

18 A. No. PacifiCorp has specifically designed the timing of the rate-year update so it  
19 should not conflict with the normal TAM schedule, which is to be filed April 1. The  
20 rate year update is designed to be resolved and going into rates on April 1.<sup>34</sup>

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<sup>31</sup> *In the matter of PacifiCorp, dba Pacific Power 2017 Transition Adjustment Mechanism*, Docket No. UE 307, Order No. 16-482 at 2-3 (Dec. 20, 2016).

<sup>32</sup> CUB/200, Gehrke/2.

<sup>33</sup> AWEC/100, Mullins/29.

<sup>34</sup> Unless the TAM is filed concurrently with a general rate case, the TAM will be filed April 1 as noted above.



1           Additionally, as I have repeatedly stated, PacifiCorp has designed the increased  
2           administrative effort to be as simple as possible.

3       **Q.   PacifiCorp has identified that a significant purpose behind the rate year update**  
4       **is the Western Resource Adequacy Program (WRAP) being developed through**  
5       **the Western Power Pool. CUB states that “any consideration of a rate year**  
6       **update for the impacts of the WRAP would be premature.”<sup>35</sup> How do you**  
7       **respond?**

8       A.   Implementing this program now fits well with the timing for the implementation of  
9       WRAP. PacifiCorp is currently participating in Phase 3A of WRAP, which is the  
10      non-binding phase, meaning the forward showing requirements will be set and  
11      participants will give best efforts to comply but there will not be a penalty for  
12      noncompliance. The first forward showing is anticipated to be for the  
13      2022-2023 winter season.

14      **Q.   Is the Company’s goal to minimize regulatory lag with the rate year or spring**  
15      **update as identified by CUB?<sup>36</sup>**

16      A.   No, as I stated in my direct testimony, the goal is to incorporate additional resources  
17      from the WRAP, and the latest information on forward prices, short term power and  
18      gas transactions, and hydrological conditions to provide the most accurate NPC for  
19      customers.

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<sup>35</sup> CUB/200, Gehrke/4.

<sup>36</sup> CUB/200, Gherke/5.

1 **Q. AWEC further contends that the purpose of the TAM is to calculate transition**  
2 **adjustments for direct access customers and PacifiCorp’s proposal would lead to**  
3 **a mismatch between rates for cost-of-service customers and direct access**  
4 **customers.<sup>37</sup> In AWEC’s view this necessitates a new direct access window. How**  
5 **do you respond?**

6 A. While AWEC is correct that one purpose of the TAM is to calculate transition  
7 adjustments, the other purpose is to calculate NPC for cost-of-service customers.

8 These two purposes are explicitly stated in the TAM Guidelines:

9 Pacific Power's Transition Adjustment Mechanism (TAM) is an  
10 annual filing with the objective to update the forecast net power  
11 costs to account for changes in market conditions, with the final  
12 forecast update close to the direct access window to capture costs  
13 associated with direct access, and to correctly identify the proper  
14 amount for the transition adjustment.<sup>38</sup>

15 PacifiCorp’s proposal is consistent with this purpose and the Commission’s  
16 continually stated goal of achieving a more accurate TAM forecast. Additionally, as I  
17 noted in my direct testimony, “[t]he purpose of the Rate-Year Update is to capture the  
18 acquisition of any resources or transactions to meet the Company’s resource  
19 adequacy requirements and set the TAM rates as accurately as possible. It is  
20 PacifiCorp’s understanding that Electric Service Suppliers will be subject to separate  
21 resource adequacy requirements under the latest proposals in the Commission’s  
22 resource adequacy proceedings.”<sup>39</sup> Specifically, the rate year update captures costs  
23 that are incurred to serve cost-of-service customers, and not direct access customers,

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<sup>37</sup> AWEC/100, Mullins/29.

<sup>38</sup> *In the Matter of PacifiCorp d/b/a Pacific Power, 2009 Transition Adjustment Mechanism, Schedule 200, Cost-Based Supply Service*, Docket No. UE 199, Order No. 09-274, Appendix A at 9 (Jul. 16, 2009).

<sup>39</sup> PAC/400, Wilding/6.

1 because direct access customers have already left the system. Therefore, the goal of  
2 this rate-year update is to capture costs that are uniquely applicable to cost-of-service  
3 customers and not direct access customers, so the fact that there is a mismatch in  
4 these costs is appropriate.

5 **Q. AWEC contends that it is not possible to develop a reasonable forecast of**  
6 **hydrologic conditions.<sup>40</sup> Is this true?**

7 A. No, as PacifiCorp has identified, there are reputable third-party forecasts that are  
8 available from the Northwest River Forecast Center (NWRFC), and from the National  
9 Oceanic and Atmospheric Administration (NOAA), which produces a rolling  
10 12-month hydrological forecast. These are forecasts that are used by Idaho Power in  
11 Oregon, and simply because AWEC is not familiar with that process does not detract  
12 from the fact that the Commission has approved their use in power cost  
13 proceedings.<sup>41</sup>

14 **Q. AWEC additionally contends that incorporating hydrological variables into the**  
15 **TAM forecast would depart from normalized NPC.<sup>42</sup> How do you respond?**

16 A. The TAM includes a number of elements that are not normalized out of necessity.  
17 These most notably include the Official Forward Price Curve (OFPC), future  
18 short-term firm power transactions, future natural gas physical transactions, future  
19 natural gas financial transactions, and certain components of the load forecast which  
20 incorporate expectations of future conditions such as new customer contracts, large

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<sup>40</sup> AWEC/100, Mullins/30.

<sup>41</sup> *In the Matter of Idaho Power Company, Application for Authority to Implement a Power Cost Adjustment Mechanism for Electric Service to Customers in the State of Oregon*, Docket No. UE 195, Order No. 08-238, Appendix A at 6 (Apr. 28, 2008).

<sup>42</sup> AWEC/100, Mullins/31.

1 customer schedules, macroeconomic drivers, etc. Using a non-normalized  
2 hydrological forecast just places hydro conditions into this same bucket of  
3 non-normalized inputs. This is not a radical departure from past practice, but a minor  
4 change to increase the accuracy of the TAM.

5 **Q. CUB states that this change is not needed because “hydro generation is expected**  
6 **to be a smaller portion of PacifiCorp’s installed electric capacity over time.”<sup>43</sup>**

7 **How do you respond?**

8 A. Comparing energy to capacity is misleading. For a meaningful comparison, CUB  
9 needs to examine PacifiCorp’s hydro generation as a portion of PacifiCorp’s total  
10 generation over time. For example, the retirement of a 100 megawatts (MW)  
11 coal-fired resource and the installation of a 200 MW wind resource could result in an  
12 *increase* to PacifiCorp’s installed electric capacity but a *decrease* to PacifiCorp’s  
13 total generation. Since a 100 MW coal-fired resource can produce  
14 100 megawatt hour (MWh) of generation across the year, but a 200 MW wind  
15 resource may only be expected to produce an average of 80 MWh of generation  
16 across the year based on prevailing wind conditions, one observes that in this example  
17 the installed capacity has increased but the total generation that serves load has  
18 decreased.

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<sup>43</sup> CUB/200, Gehrke/5.

1 **B. Changes to the PCAM**

2 **Q. CUB and AWEC’s testimony states that circumstances have not changed since**  
3 **PacifiCorp’s last general rate case and that PacifiCorp is simply rehashing old**  
4 **arguments.<sup>44</sup> How do you respond?**

5 A. PacifiCorp’s proposal in this proceeding is different from the proposal that the  
6 Company offered in the last general rate case. In PacifiCorp’s last general rate case,  
7 the Company proposed completely eliminating the deadbands, sharing bands, and  
8 earnings test in the PCAM. In this proceeding, PacifiCorp is now proposing to  
9 address the deficiencies in evidence that the Commission identified in the last general  
10 rate case and is proposing adjustments to those mechanisms without the elimination  
11 of those elements of the PCAM.

12 **Q. CUB further contends that PacifiCorp has continually made the same arguments**  
13 **regarding the increasing level of renewable resources in Oregon and in other**  
14 **jurisdictions.<sup>45</sup> How do you respond?**

15 A. Yes, PacifiCorp has always predicted that the increase in renewable generation would  
16 increasingly affect the variability and ability to appropriately forecast NPC. As shown  
17 in Figure 1, the increase in the PCAM balances correlates to these concerns and  
18 shows that the scope of the problem has been increasing over time.

19 Additionally, CUB has identified that PacifiCorp made many similar  
20 arguments in the 2020 Wyoming general rate case. However, CUB ignores the  
21 outcome of the 2020 Wyoming general rate case, where the Commission found that  
22 “[t]he Company presented persuasive evidence that it is taking steps to reduce

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<sup>44</sup> CUB/200, Gehrke/7; AWEC/100, Mullins/35.

<sup>45</sup> CUB/200, Gehrke/7-9.

1 forecasting and other NPC-related risks, which, while insufficient to refute the other  
2 parties' arguments against elimination, was sufficient to support a modest adjustment  
3 from a 70/30 sharing band to an 80/20 sharing band.”<sup>46</sup> The Wyoming Public Service  
4 Commission found the evidence presented by the Company persuasive enough to  
5 modify PacifiCorp’s ECAM mechanism in a modest way.

6 **Q. So, Wyoming’s NPC true-up mechanism does not have an earnings test,  
7 deadbands and only contains an 80/20 sharing band?**

8 A. Yes, and I would support changes to the Oregon PCAM to match the structure used  
9 by Wyoming as a significant improvement to the current structure.

10 **Q. CUB contends that PacifiCorp’s end goal around NPC is to have a 100 percent  
11 true up of actual NPC to forecasted NPC. Is this accurate?**

12 A. Yes, but it is not the nefarious outcome that is envisioned by CUB. In fact, 25 states  
13 of the 35 states with a similar utility regulatory structure have 100 percent true-up  
14 mechanisms with actual prudently incurred NPC including Utah and California.<sup>47</sup>  
15 California adjusts PacifiCorp’s forecast and true-up each year on a full pass-through  
16 basis. Additionally, as PacifiCorp has described above in response to Staff, the  
17 distribution of risk in the PCAM is systemically biased against the potential for the  
18 Company’s revenue neutrality.

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<sup>46</sup> *In the Matter of the Application of Rocky Mountain Power for Authority to Increase Its Retail Electric Service Rates*, Docket No. 20000-578-ER-20 (Record No. 15464), Order at ¶193 (July 15, 2021).

<sup>47</sup> *In the Matter of the Application of PacifiCorp d/b/a Pacific Power for a General Rate Increase*, Docket No. UE 374, PAC/600, Graves/43 (Feb. 14, 2020). The 35 states similarly situated to Oregon were identified by excluding those states that have unbundled generation from delivery services and/or that participate in an independent system operator (ISO) and within have deregulated merchant generation.

1 **Q. CUB additionally contends that PacifiCorp has benefitted from the clean energy**  
2 **transition because it is able to build transmission and new generation projects.<sup>48</sup>**

3 **How do you respond?**

4 A. CUB is creating a false dichotomy. Simply because rate base may increase,  
5 PacifiCorp should not be categorically denied the recovery of prudently incurred  
6 operations costs that are necessary to serve customers. PacifiCorp would point out  
7 that it is not good policy to automatically haircut utilities on the very real costs of  
8 integrating renewables into our system and across the WECC, which is exactly what  
9 the current structure of the PCAM does.

10 **Q. CUB states that PacifiCorp's IRP includes a number of dispatchable resources.<sup>49</sup>**  
11 **Will the existence of these dispatchable resources solve the issue of forecasting**  
12 **renewable generation?**

13 A. No. Dispatchable resources exist today but yet the persistent forecasting error that is  
14 caused by the trend of increasing penetration of Variable Energy Resources has not  
15 been solved. Furthermore, CUB's statement is misleading. The amount of  
16 dispatchable capacity, measured in terms of dispatchable hours, on the system today  
17 will decrease as thermal plants retire. Simply pointing out that PacifiCorp's IRP  
18 includes a number of dispatchable resources lacks sufficient context to inform a  
19 reasonable argument.

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<sup>48</sup> CUB/200, Gehrke/10.

<sup>49</sup> CUB/200, Gehrke/11.

1 **Q. AWEC contends that these changes described in the response above do not**  
2 **warrant a change to the structure of the PCAM.<sup>50</sup> How do you respond?**

3 A. AWEC contends that these changes are simply part of the normal business risk, but  
4 provides no evidence to support this conclusion, nor do they address PacifiCorp's  
5 evidence in direct testimony that these changes result in correspondingly unfavorable  
6 changes to PacifiCorp's business risk. In conjunction with this and in response to  
7 Staff, PacifiCorp has also detailed the prevailing inequity in the current risk balance.

8 **Q. AWEC alleges that PacifiCorp has not addressed the Commission's underlying**  
9 **rational for the earnings test design or explained why it is no longer applicable.<sup>51</sup>**  
10 **Why is it appropriate to change the earnings test?**

11 A. PacifiCorp's has provided evidence that the current structure of the PCAM no longer  
12 operates "in the long-term to balance the interests of the utility shareholder and  
13 ratepayer[.]"<sup>52</sup> Therefore, PacifiCorp's proposed changes are warranted. Maintaining  
14 the earnings test at the authorized return on equity still supports the goals of "no  
15 adjustments if the utility's overall earnings are reasonable" and revenue neutrality.<sup>53</sup>  
16 Therefore, PacifiCorp's proposal is consistent with the principles by which the  
17 PCAM has been designed.

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<sup>50</sup> AWEC/100, Mullins/37.

<sup>51</sup> AWEC/100, Mullins/38.

<sup>52</sup> Order No. 12-493 at 13.

<sup>53</sup> Order No. 12-493 at 13.



1 **Q. CUB asserts that PacifiCorp’s proposal to remove unusual events for treatment**  
2 **outside the deadbands, earnings test, and sharing bands is arbitrary and**  
3 **one-sided.<sup>54</sup> Do you agree?**

4 A. No. PacifiCorp’s change only allows the Company *to propose* that certain costs be  
5 treated outside the deadbands, sharing bands, and earnings test. If parties to the  
6 PCAM proceeding do not agree that PacifiCorp’s proposed treatment is appropriate,  
7 they have the ability to file testimony and advocate against the treatment proposed by  
8 PacifiCorp. CUB’s contention that this change is one-sided because PacifiCorp has  
9 additional insight into its own operations is also a fallacious argument, because it is  
10 true of every cost for which PacifiCorp seeks recovery. CUB’s arguments regarding  
11 PacifiCorp’s cost recovery being arbitrary and one-sided is true for every ratemaking  
12 proceeding in front of the Commission.

13 **Q. Is PacifiCorp’s proposal single-issue ratemaking?**

14 A. Yes, but recovery of NPC is already single-issue ratemaking. The Commission  
15 approves forecasts of these costs every year, and a true-up mechanism already exists.  
16 The Commission has already made the policy decision to treat NPC costs as single-  
17 issue ratemaking, PacifiCorp is now simply proposing to tweak how recovery of  
18 actual costs occurs.

19 **Q. AWEC points to the first principle of the PCAM in Oregon as evidence that the**  
20 **PCAM structure already incorporates an allowance for unusual events.<sup>55</sup> Do you**  
21 **agree?**

22 A. No. The first principle of a well-designed PCAM as articulated by the Commission is

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<sup>54</sup> CUB/200, Gehrke/11-12.

<sup>55</sup> AWEC/100, Mullins/38-39.

1 that “any adjustment under a PCAM should be limited to unusual events and capture  
2 power cost variances that exceed those considered normal business risk for the  
3 utility.”<sup>56</sup> However, PacifiCorp disagrees that the current PCAM is well-designed. In  
4 fact, I described the Enbridge Pipeline, which was an unusual event that exceeded the  
5 normal business risk for the utility, but which the PCAM failed to capture.<sup>57</sup> The  
6 change that is being proposed here will in fact better align the PCAM with the  
7 principles articulated by the Commission.

8 **Q. AWEC contends that if the Commission should adopt any of PacifiCorp’s**  
9 **changes to the PCAM, then it is appropriate to lower PacifiCorp’s proposed**  
10 **return on equity to account for the lower risk the utility is assuming.<sup>58</sup> Is this**  
11 **appropriate?**

12 A. No, as discussed further in the testimony of Company witness Ann Bulkley, this is  
13 not an appropriate recommendation.

14 **C. AWEC’s proposed changes to the TAM Guidelines**

15 **Q. AWEC has proposed a number of changes to the TAM Guidelines. Have you**  
16 **reviewed those changes?**

17 A. Yes, I have reviewed the four proposed changes from AWEC, and I recommend that  
18 the Commission reject all of them. While PacifiCorp generally supports changes to  
19 the TAM guidelines that improve efficiency and the ability of stakeholders to review  
20 our filings, AWEC’s proposed changes impose significant administrative burdens on

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<sup>56</sup> Order No. 12-493 at 13.

<sup>57</sup> PAC/400, Wilding/25-26.

<sup>58</sup> AWEC/100, Mullins/40.

1 the Company, and all Parties in the TAM proceedings, with only marginal gain and  
2 should therefore be rejected.

3 **Q. AWEC recommends a seven-day discovery window for the TAM.<sup>59</sup> Is this**  
4 **workable?**

5 A. No, PacifiCorp received upwards of three hundred data requests from the initial filing  
6 to Staff and intervenor's Direct filing in this year's TAM. Based on past experience,  
7 this is a fairly normal amount of data requests for a TAM filing. Moving to a  
8 seven-day turnaround for discovery upon the initial filing would present an untenable  
9 administrative burden on the Company. This is especially true because the data  
10 requests often require detailed and in-depth narrative explanations of very technical  
11 net power cost issues. PacifiCorp simply does not have the ability to respond to the  
12 volume of these requests on seven-day time period. As stated earlier, PacifiCorp is  
13 open to a workshop to discuss the TAM workpapers (after filing the 2024 TAM).  
14 This workshop could include Parties working together to propose changes to  
15 Attachment B of the TAM Guidelines, which details the workpapers to be provided.<sup>60</sup>  
16 This would allow Parties to better receive certain information that they are interested  
17 in reviewing before starting the data request process.

18 **Q. AWEC proposes moving the TAM filing date to March 1 instead of April 1 in**  
19 **years of stand-alone TAM filing.<sup>61</sup> Do you agree with this recommendation?**

20 A. No. First of all I disagree that the complexity and difficulty of analyzing the filing has  
21 increased as a result of the move to Aurora. Aurora is an industry standard model and

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<sup>59</sup> AWEC/100, Mullins/32-33.

<sup>60</sup> *In the Matter of PacifiCorp d/b/a Pacific Power, 2009 Transition Adjustment Mechanism, Schedule 200, Cost-Based Supply Service*, Docket No. UE 199, Order No. 09-274, Appendix A at 15-19(Jul. 16, 2009).

<sup>61</sup> AWEC/100, Mullins/33.

1 is not a PacifiCorp-specific model like GRID. Additionally, PacifiCorp has worked  
2 hard to keep the same structure and location to the workpapers for both GRID and  
3 Aurora to ensure that Parties can easily review the workpapers. PacifiCorp is aware of  
4 the longer run-times in Aurora for the model to solve, but those longer run-times cut  
5 both ways. It now takes PacifiCorp longer to conduct the modeling runs that are  
6 necessary to complete the TAM filing.

7 PacifiCorp can file on March 1 in general rate case years to ensure that  
8 customers have a synchronized rate effective date of January 1. However,  
9 accomplishing that requires a herculean effort on the part of the Company's net  
10 power cost team, and requiring such a significant effort every year is an untenable  
11 administrative burden.

12 **Q. AWEC also recommends using a base period that corresponds to the calendar**  
13 **year prior to the filing. Is this possible?**

14 A. No, this would delay the TAM's initial filing to July 1<sup>st</sup>. The totality of the base  
15 period is updated every 6 months, beginning at the end of Q2 and at the end of Q4,  
16 with each update taking 3 months to complete. The TAM's initial filing also takes  
17 3 months to complete, from start to finish, and requires a finalized base period as an  
18 input. To use a base period that corresponds to the calendar year prior to the filing,  
19 PacifiCorp would need to use the input data from the base period update that begins  
20 at the end of Q4. However, this base period update would not be completed until  
21 April 1<sup>st</sup>. Consequently, the TAM's initial filing would need to begin processing on  
22 April 1<sup>st</sup> and would therefore be complete on July 1<sup>st</sup> at which point the initial filing  
23 would be ready to be sent out to Parties.

1 **Q. AWEC contends that PacifiCorp’s investments in energy trading software and**  
2 **the Aurora model would make the necessary data available to complete this**  
3 **change.<sup>62</sup> Is this true?**

4 A. No. As an initial matter, PacifiCorp is unaware of which particular energy trading  
5 software AWEC is referring to. Regardless, across the entire suite of energy trading  
6 software that PacifiCorp has invested in, none of this software is related to any recent  
7 changes in the timing of the availability of the source data that inform the base period.  
8 Similarly, the NPC forecasting tool Aurora, has absolutely no impact on the base  
9 period’s source data. The Company fails to recognize how AWEC’s proposed  
10 changes to TAM guidelines relate to its usage of energy trading software.

11 **Q. AWEC additionally recommends that PacifiCorp be required to complete an**  
12 **October Update on October 10<sup>th</sup>.<sup>63</sup> Is this timing of this update feasible?**

13 A. No. The timing is simply untenable. PacifiCorp is able to complete the indicative and  
14 final TAM updates in November on expedited timelines because of extensive  
15 planning and pre-work during the month of October. Placing another update in  
16 October, one month prior to the indicative November update, is unnecessary and  
17 administratively unmanageable.

18 Additionally, such an update would be awkwardly timed in the procedural  
19 schedule of the TAM. It would occur after the record is closed while the Commission  
20 is considering the record and drafting a decision for the TAM. Therefore, it would not  
21 incorporate any Commission-ordered adjustments or changes like the indicative and  
22 final update.

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<sup>62</sup> *Id.*

<sup>63</sup> *Id.*

1 **Q. Would providing an update in October even provide additional insight as**  
2 **compared to the TAM indicative filing?**

3 A. No. The only input that would change is the OFPC. This OFPC would be of a  
4 vintage that is one month prior to the OFPC used in November and consequently  
5 provide minimal insight.

6 **Q. Does this conclude your reply testimony?**

7 A. Yes.

Docket No. UE 399  
Exhibit PAC/1600  
Witness: Allen Berreth

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Allen Berreth

July 2022

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1 **Q. Are you the same Allen Berreth that filed direct testimony on behalf of PacifiCorp**  
2 **d/b/a Pacific Power (PacifiCorp or the Company)?**

3 A. Yes.

4 **I. PURPOSE AND SUMMARY**

5 **Q. What is the purpose of your reply testimony in this case?**

6 A. I respond to the opening testimony of Mitch Moore and Steve Storm, filed on behalf of  
7 the Public Utility Commission of Oregon (Commission) Staff.

8 **Q. Please summarize your reply testimony.**

9 A. In my testimony, I respond to Staff's proposal for verification of the Company's capital  
10 spending on wildfire mitigation, demonstrate the accuracy of PacifiCorp's wildfire  
11 mitigation and vegetation management costs for Oregon, and explain the reasonableness  
12 of the Company's proposed changes to the operation of the Wildfire Mitigation and  
13 Vegetation Management mechanism (WMVM) during the current transition to a three-  
14 year trimming cycle.

15 **II. RESPONSE TO STAFF'S RECOMMENDATIONS AND ADJUSTMENTS**

16 **A. Wildfire Mitigation Capital Investments**

17 **Q. Does Staff propose any adjustment to the Company's wildfire mitigation capital**  
18 **investments?**

19 A. No. Staff agrees that the investments are consistent with the Company's Commission-  
20 approved Wildfire Protection Plan (WPP) and therefore Staff recommends no adjustment  
21 of the proposed capital investment of \$34.9 million.<sup>1</sup> Staff does recommend, however,

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<sup>1</sup> Staff/1300, Moore/3.

1 that the Company provide certification that the capital projects are complete and in-  
2 service by the rate effective date.<sup>2</sup>

3 **Q. Does the Company object to Staff's certification requirement?**

4 A. No. The Company recommends, however, that it submit a single certification verifying  
5 the final dollar amount for wildfire capital projects that have been placed in-service,  
6 rather than individual certifications for each project. This approach will streamline the  
7 compliance process.

8 **B. Wildfire Mitigation and Vegetation Management Expense**

9 **Q. Please summarize the Company's requested level of wildfire mitigation and**  
10 **vegetation management expense in this case.**

11 A. The Company is requesting a total of \$70.8 million, Oregon-allocated, in combined  
12 vegetation management and wildfire mitigation expense for 2023.

13 **Q. What is Staff's position on the proposed wildfire mitigation and vegetation**  
14 **management expense?**

15 A. Staff agrees that the test year expenditures are consistent with Commission guidance in  
16 the Company's last rate case and the Company's Commission-approved WPP.<sup>3</sup> But Staff  
17 still recommends a reduction of \$6.5 million.

18 **Q. What is the basis for Staff's disallowance?**

19 A. Staff compared the Oregon expense level to the total-company expense level and  
20 concluded that the Oregon share had increased as a percentage of the total-company

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<sup>2</sup> Staff/1300, Moore/3.

<sup>3</sup> Staff/1300, Moore/5.

1 relative to historical levels. Staff contends that the Company's Oregon costs should not  
2 be increasing at a faster rate than its costs in other jurisdictions.<sup>4</sup>

3 **Q. How did the Company determine its Oregon wildfire mitigation and vegetation**  
4 **management expense?**

5 A. The Company's expenses are based on a budget that identifies where and how the money  
6 will be spent. This enabled the Company to accurately determine the percentage of total  
7 2023 expenses that are assigned to Oregon.

8 **Q. Is Staff's adjustment reasonable?**

9 A. No. Most of the Company's wildfire mitigation and vegetation management expense is  
10 situs-assigned because it primarily relates to the distribution system, i.e., there is  
11 relatively little investment related to the transmission system, which would be system-  
12 allocated. Oregon's share is increasing because more of the Company's Oregon facilities  
13 are in forested, high consequence areas relative to other states, so Oregon has a greater  
14 need for increased wildfire mitigation investment.

15 **Q. Did Staff identify any specific costs it contends were incorrectly assigned to Oregon?**

16 A. No. Staff has not identified any specific expense that it believes should be assigned to  
17 the system or to another state. Instead, Staff simply looks at a three-year historical  
18 average of the Oregon expense level relative to the total-company and concludes that  
19 there should be no changes going forward, without providing any analysis on the actual  
20 projects that will be funded in 2023. Given the ongoing expansion of the Company's  
21 wildfire mitigation program in Oregon, historical comparisons of Oregon expense

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<sup>4</sup> Staff/1300, Moore/5-6.

1 relative to system expense are not a reasonable basis for accurately forecasting Oregon  
2 test year expense.

3 **Q. Has PacifiCorp made a proposal in its reply testimony that should obviate Staff's**  
4 **apparent concern that the test year expense is overstated?**

5 A. Yes. In her reply testimony, Ms. Joelle Steward agrees that PacifiCorp will track and  
6 report on its actual test year expenditures for wildfire mitigation and vegetation  
7 management and defer unspent dollars. For this reason, even if Staff's disallowance was  
8 analytically sound, it is unwarranted.

9 **C. Wildfire Mitigation and Vegetation Management Mechanism**

10 **Q. What is Staff's recommendation related to the WMVM?**

11 A. Staff recommends that until the Company has an approved Automatic Adjustment Clause  
12 (AAC), all wildfire mitigation and vegetation management expense be recovered through  
13 the WMVM.<sup>5</sup> Because Staff reduces the Company's Oregon-allocated expense level to  
14 \$64.2 million, Staff's recommendation would create a baseline of \$57.8 million, which  
15 represents 90 percent of the test year expenses. The remaining 10 percent (or  
16 \$6.4 million) would be held back and subject to the WMVM's earnings test.

17 **Q. Is Staff's recommendation reasonable?**

18 A. No. In her reply testimony, Ms. Steward explains why the Company's incremental WPP  
19 implementation costs should be collected through the Company's proposed AAC,  
20 Schedule 190, and why a 10 percent holdback is unreasonable.

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<sup>5</sup> Staff/1700, Storm/61-62.

1 **Q. In addition to excluding WPP-related costs, PacifiCorp proposed other refinements**  
2 **to the WMVM, including some that Staff itself proposed in PGE’s recent rate case,**  
3 **docket UE 394. Does Staff agree with the Company’s proposal to increase the**  
4 **number of violations used to determine the applicable earnings test for incremental**  
5 **wildfire mitigation and vegetation management expense to match the level Staff**  
6 **proposed for PGE?**

7 A. No. Staff supports no change to the existing violation levels for PacifiCorp, which are  
8 50 percent lower than those it proposed to apply to PGE.<sup>6</sup>

9 **Q. Why does Staff object to increasing the violation levels in the WMVM?**

10 A. Staff argues that the Company’s vegetation management performance has not improved  
11 and has actually degraded.<sup>7</sup>

12 **Q. How do you respond to Staff’s argument?**

13 A. The Company disagrees with Staff’s overly simplistic review of the Company’s  
14 vegetation management program and its position that the Company’s performance has  
15 declined. Beginning in 2022, the Company’s trimming work is moving from a four-year  
16 cycle to a three-year cycle. This means that it will take three years, through the end of  
17 2024, to show improvement because it is only after three years that the trimming  
18 operations will differ.

19 **Q. Should the Commission use PacifiCorp’s proposed higher violation threshold levels,**  
20 **at least during the three-year transition to its accelerated trimming cycle, beginning**  
21 **in 2022?**

22 A. Yes. To the extent that the WMVM is intended to incent better performance, the targets

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<sup>6</sup> Staff/1700, Storm/63.

<sup>7</sup> Staff/1700, Storm/63.

1 must be achievable. The violation levels now in the WMVM are not realistic or  
2 achievable targets during the transition to the three-year trimming cycle. To achieve the  
3 low level of violations included in the current WMVM would require the Company to  
4 spend in one year the total of a three-year cycle to ensure that at the end of one year, the  
5 system is fully transitioned. This would require significant added expense and staffing  
6 (which is currently unavailable).

7 **Q. In addition to PacifiCorp being in transition to a three-year trimming cycle, are**  
8 **there other factors impacting the Company's ability to achieve the low violation**  
9 **levels now in the WMVM?**

10 A. Yes. The current violation levels fail to consider deteriorating environmental conditions  
11 that are creating increased violations, notwithstanding the Company's improved efforts.  
12 More trees are drying out and becoming subject to greater infestation.

13 **Q. Is the Company open to revisiting the violation levels once it has fully transitioned**  
14 **to a three-year trimming cycle?**

15 A. Yes. Assuming the WMVM is renewed and remains in place at the conclusion of this  
16 transition (end of 2024), the Commission could reset the violation levels at a lower level  
17 to reflect PacifiCorp's new steady state.

18 **Q. Staff argues that the violations used in the WMVM's earning test should be based**  
19 **on probable violations identified by Commission Safety Staff even if the violation is**  
20 **never verified.<sup>8</sup> Do you agree?**

21 A. Yes, as long as PacifiCorp has a meaningful opportunity to challenge probable violations  
22 before they are applied in the WMVM. Contrary to Staff's implication, however,

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<sup>8</sup> Staff/1700, Storm/66.

1 PacifiCorp was not proposing that its wildfire mitigation and vegetation management  
2 expenses should be spent verifying the existence of actual clearance violations, rather  
3 than remedying those violations and, contrary to Staff's testimony, the proposed increase  
4 in wildfire mitigation and vegetation management spending has nothing to do with  
5 verifying probable violations.<sup>9</sup> As Staff noted, probable violations must be resolved, or  
6 they are carried forward so the Company will incur expense to investigate and resolve  
7 probable violations. There is no incremental expense to determine whether a probable  
8 violation is an actual violation because either way the Company must resolve the issue  
9 identified by Commission Safety Staff.

10 **Q. Staff also disagrees with the Company's proposal that Commission Safety Staff**  
11 **audit only those lines that have been trimmed within the cycle covered by the**  
12 **WMVM.<sup>10</sup> What is the basis for Staff's position?**

13 A. Staff testifies that such an audit would be of the Company's trimming program, not  
14 wildfire risk. But the use of clearance violations in the WMVM means that cost recovery  
15 is explicitly tied to the performance of the Company's trimming program, so auditing that  
16 program is what the WMVM requires.

17 **Q. Can you clarify PacifiCorp's position on the scope of Staff's audit during the three-**  
18 **year transition period?**

19 A. Yes. The Company is not recommending that Staff limit its audit to specified areas.  
20 Instead, the Company is recommending that, for purposes of applying the thresholds in  
21 the WMVM, only violations in trimmed areas, under the new 3-year cycle program, be

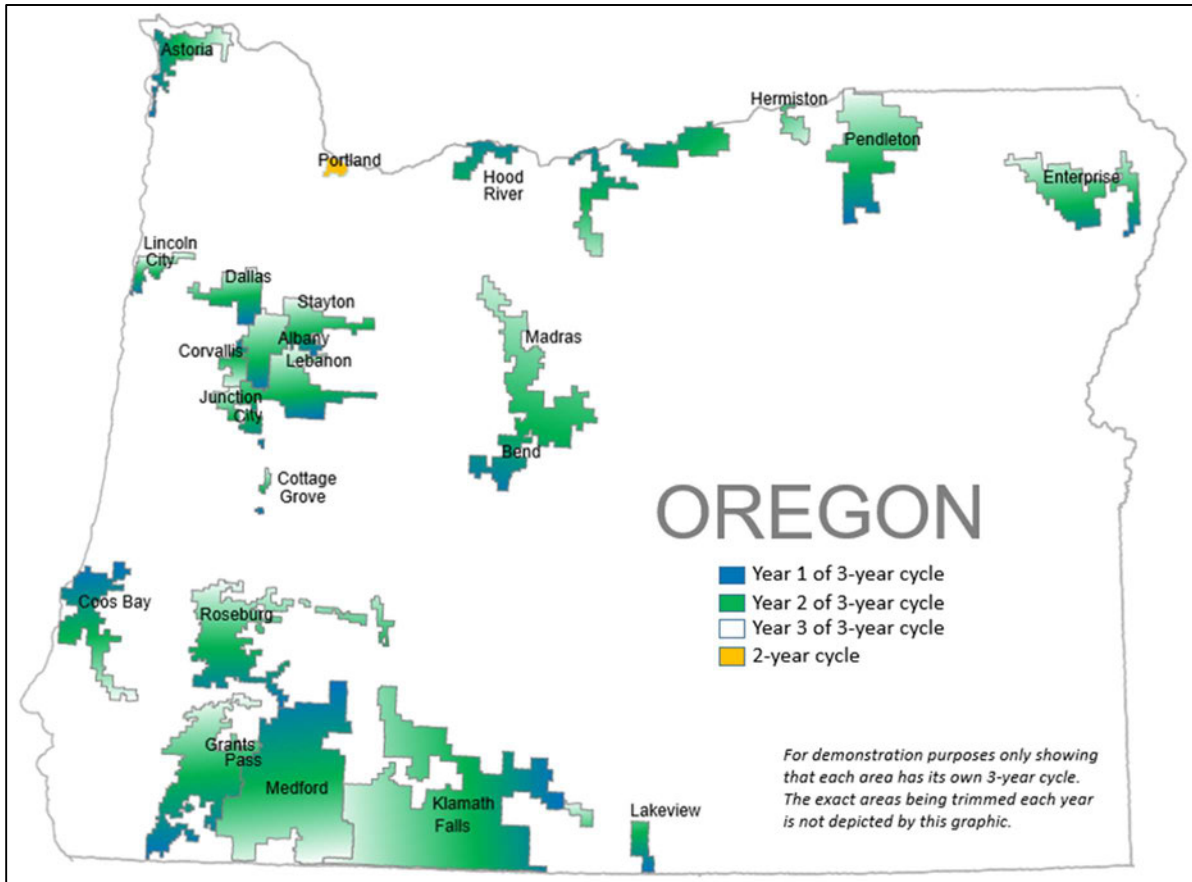
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<sup>9</sup> Staff/1700, Storm/69.

<sup>10</sup> Staff/1700, Storm/67.

1 counted. As depicted in Figure 1, for 2022, this is roughly one-third of PacifiCorp's  
2 Oregon system, in 2023 it will be two-thirds, and in 2024 it will be the entire system.

3 **Figure 1. Representation of the Oregon 3-year Vegetation Trimming Cycle**



4 **Q. Staff argues that lines that have not been trimmed for two years may be most in**  
5 **need of investigation by Commission Safety Staff.<sup>11</sup> Please respond.**

6 **A.** PacifiCorp recognizes the need for increased vegetation management spending (which it  
7 has proposed), as well as the need for an accelerated trimming cycle (reflected in the  
8 Company's transition to a three-year cycle). The Company also notes that this new  
9 program level of spend will take an entire cycle (three years) before the results will be

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<sup>11</sup> Staff/1700, Storm/69.



1 achieved everywhere on the system. Therefore, the mechanism in year one (with only  
2 one-third of the system on the new program) should look different than the mechanism in  
3 year three (when the entire system is on the new program). This is the basis for the  
4 Company's proposals to change the WMVM during the transition period; PacifiCorp is  
5 not proposing to ignore parts of its system in need of trimming or limit Staff's ability to  
6 audit the entire system.

7 **Q. Staff also disagrees with the Company's proposal to increase the baseline wildfire**  
8 **mitigation and vegetation management costs based on inflationary cost pressures**  
9 **because, according to Staff, such cost pressures are not entirely outside PacifiCorp's**  
10 **control.<sup>12</sup> How do you respond?**

11 A. The Company agrees that it can work to increase the efficiency of its operations in  
12 response to all types of cost pressures, including inflation. But the Company's efforts can  
13 only go so far. If increasing wildfire mitigation and vegetation management costs are  
14 subject to potential disallowance under the WMVM because the baseline amounts remain  
15 unchanged while the costs increase, the mechanism will not operate as intended and  
16 disincentivize incremental and prudent wildfire mitigation and vegetation management  
17 efforts.

18 **Q. Notwithstanding Staff's general opposition, does PacifiCorp continue to believe that**  
19 **a sharing mechanism would be more appropriate for the WMVM than the current**  
20 **earnings test thresholds?<sup>13</sup>**

21 A. Yes. Ms. Steward addresses this issue in her reply testimony.

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<sup>12</sup> Staff/1700, Storm/70.

<sup>13</sup> Staff/1700, Storm/73.

- 1 **Q. Does this conclude your reply testimony?**
- 2 **A. Yes.**

Docket No. UE 399  
Exhibit PAC/1700  
Witness: Matthew McVee

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Matthew McVee

July 2022

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1                                   **I. INTRODUCTION AND QUALIFICATIONS**

2   **Q. Please state your name, business address, and present position with PacifiCorp**  
3   **d/b/a Pacific Power (PacifiCorp or the Company).**

4   A. My name is Matthew McVee, and my business address is 825 NE Multnomah Street,  
5   Suite 2000, Portland, Oregon 97232. I am currently employed as Vice President,  
6   Regulatory Policy and Operations.

7   **Q. Please describe your education and professional experience.**

8   A. I have a Bachelor of Science Degree in Biology from Lewis and Clark College and a  
9   Juris Doctorate Degree from Lewis and Clark Law School. I have provided legal  
10   counsel to various clients in regulatory matters at both state regulatory commissions  
11   and the Federal Energy Regulatory Commission, and acted as administrative attorney  
12   to a commissioner at the Nevada Public Utilities Commission. I joined PacifiCorp in  
13   2005 as senior legal counsel for transmission. I became General Counsel for the  
14   Western Electricity Coordinating Council in 2008 and joined the law firm Troutman  
15   Sanders P.C. as a partner in 2010. I rejoined the PacifiCorp legal department in 2013.  
16   Before taking my current position in November 2021, I was Chief Regulatory  
17   Counsel for PacifiCorp. My current responsibilities include: managing regulatory  
18   relations with the California, Oregon, and Washington state regulatory commissions,  
19   staffs, and stakeholders; developing regulatory policy strategies for PacifiCorp; and  
20   managing PacifiCorp's regulatory discovery and filings group.

21   **Q. Have you testified in other regulatory proceedings?**

22   A. Yes. I have testified on various matters in California.

1 **Q. Are you adopting the direct testimony of Erik Anderson, Exhibit PAC/800?**

2 A. Yes.

3 **II. PURPOSE OF TESTIMONY**

4 **Q. What is the purpose of your reply testimony in this case?**

5 A. The purpose of my testimony is to respond to the opening testimony filed by the  
6 Public Utility Commission of Oregon (Commission) Staff and intervenors concerning  
7 the Company's proposed voluntary renewable energy tariff (VRET), which is  
8 proposed Schedule 273, Accelerated Commitment Tariff (ACT). Specifically, I  
9 respond to the testimonies of Staff witness Madison Bolton,<sup>1</sup> Oregon Citizens' Utility  
10 Board (CUB) witness William Gehrke,<sup>2</sup> Vitesse, LLC (Vitesse) witness Bradley  
11 Cebulko,<sup>3</sup> and Northwest and Intermountain Power Producers Coalition (NIPPC)  
12 witness Spencer Gray.<sup>4</sup> In my testimony, I will first address the common issues raised  
13 by parties by topic, then I will address individual issues raised by each party.

14 **Q. Please summarize the recommendations you make in your reply testimony.**

15 A. I recommend that the Commission approve the ACT as proposed by PacifiCorp in its  
16 direct filing, and direct the Company to file a deferral to track the administrative fee  
17 revenues for later crediting to cost-of-service customers. The Company recommends  
18 that the procurement cap remain at 175 average megawatts (aMW) at this time;  
19 however, it supports a case-by-case approach for new loads should the program be  
20 fully subscribed. The remaining proposed recommendations by Staff, CUB, Vitesse,

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<sup>1</sup> Staff/500, Bolton

<sup>2</sup> CUB/200, Gehrke

<sup>3</sup> Vitesse/100, Cebulko

<sup>4</sup> NIPPC/100, Gray

1 and NIPPC should be rejected at this time as unsupported, unnecessary, or needing  
2 additional review.

3 **III. VRET PROCUREMENT CAP**

4 **Q. What is the purpose of this section of your reply testimony?**

5 A. In this section of my testimony, I address proposals by CUB, NIPPC, and Vitesse  
6 regarding the procurement cap that should be approved for the Company's proposed  
7 ACT.

8 **Q. Please summarize the Staff and Intervenor proposals regarding the ACT**  
9 **procurement cap.**

10 A. CUB supports a procurement cap of 175 aMW as set forth in Condition 4 of the  
11 Commission's VRET design conditions approved in Order 16-251<sup>5</sup> and subsequently  
12 modified in Order 21-091<sup>6</sup> (VRET Design Conditions).<sup>7</sup> NIPPC also recommends  
13 that the procurement cap remain at 175 aMW.<sup>8</sup> Mr. Gray adds that if a separate cap is  
14 allowed, it should be applicable to customer-supplied Purchase Power Agreements  
15 (PPAs).<sup>9</sup> I address customer supplied option (CSO) later in my testimony. Finally,  
16 Vitesse proposes that the ACT be modified to allow a separate, 175 aMW cap for new  
17 incremental load from existing or new customers, which would require a modification  
18 of Condition 4.<sup>10</sup>

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<sup>5</sup> *In the Matter of Public Utility Commission of Oregon, Voluntary Renewable Energy Tariff for Nonresidential Customers*, Docket No. UM 1690, Order No. 16-251 (Jul. 5, 2016).

<sup>6</sup> *In the Matter of Portland General Electric Company, Investigation into Proposed Green Tariff*, Docket No. UM 1953, Order No. 21-091 (Mar. 29, 2021); Order No. 21-096 (Mar. 30, 2021), correcting Order No. 21-091.

<sup>7</sup> CUB/200, Gehrke/34.

<sup>8</sup> NIPPC/100, Gray/8-9.

<sup>9</sup> *Id.*

<sup>10</sup> Vitesse/100, Cebulko/19-21.

1 **Q. How do you respond to the various positions taken on the ACT's procurement**  
2 **cap?**

3 A. PacifiCorp believes that the 175 aMW cap is appropriate at this time for participation  
4 in the program, but strongly encourages addressing emerging issues such as new  
5 loads on a case-by-case basis. House Bill (HB) 2021 has created an opportunity to  
6 use the ACT to accelerate implementation of Oregon energy policy without increasing  
7 overall energy burden on the Company's more vulnerable customers. If PacifiCorp  
8 needs to add generation to serve new loads, it will do so only through resources that  
9 can meet the non-emitting or renewable energy compliance requirements of HB 2021.  
10 If new customers voluntarily want to take on the initial burden of the cost of the  
11 incremental renewable energy resource to serve its load, PacifiCorp believes the  
12 Commission should encourage that as an option to avoid overburdening vulnerable  
13 communities.

14 **Q. Does Vitesse witness Cebulko propose an alternate approach if his**  
15 **recommendation for a separate cap is not approved?**

16 A. Yes. He proposes that a prospective new load customer interested in participating in  
17 the ACT be allowed to seek a waiver on a case-by-case basis.<sup>11</sup> He also suggests that  
18 the Commission use the criteria set forth in Order 18-341, which allowed New Large  
19 Load Direct Access, to determine if the new load should be allowed to participate in  
20 ACT if it is fully subscribed.<sup>12</sup>

21 **Q. How do you respond?**

22 A. As discussed above, PacifiCorp supports a case-by-case approach for new loads and

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<sup>11</sup> *Id.* at 21

<sup>12</sup> *Id.* at 22.



1 believes this is a viable option to address cost shifting concerns. It is extremely  
2 difficult to anticipate all of the potential issues that could arise, and the analysis will  
3 be significantly improved when specific facts and circumstances can be reviewed in  
4 context. However, given the need to allocate risk solely to the utility, participating  
5 customers, and developers, the process has to allow for the development of a  
6 mutually agreeable solution, otherwise the Commission could be putting additional  
7 risk on the utility, without just compensation or consideration of knock-on effects that  
8 could adversely affect non-participating customers.

9 **Q. Even though it proposes the program cap remain at 175 aMW, NIPPC does not**  
10 **oppose an expedited mechanism by which PacifiCorp can increase the cap**  
11 **should program interest be in excess of 175 aMW provided that the same process**  
12 **is in place for the Company's direct access program.<sup>13</sup> How do you respond?**

13 A. I do not see this as a ripe issue at this time. As Mr. Gray admits, participation in  
14 PacifiCorp's direct access program has not reached the cap. Mr. Gray's concerns  
15 appear to relate to concerns over Portland General Electric Company's (PGE)  
16 agreement with QTS data systems, the same agreement that Mr. Gray later cites as an  
17 example that PacifiCorp should follow to allow a direct access customer to participate  
18 in the ACT program.

19 Additionally, I have some concerns with this recommendation because there  
20 are significant differences between the ACT program, where participants continue to  
21 pay their full cost-of-service rate plus the cost of participation, and direct access  
22 where the Commission is required to ensure that direct access does not cause

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<sup>13</sup> NIPPC/100, Gray/8-9.

1 unwarranted shifting of costs.<sup>14</sup> This issue is better addressed in the ongoing direct  
2 access investigation in docket UM 2024<sup>15</sup> and associated proceedings.<sup>16</sup>

3 **IV. CUSTOMER SUPPLY OPTION**

4 **Q. What is the purpose of this section of your reply testimony?**

5 A. In this section of my testimony, I address the testimony of Staff witness Bolton,  
6 Vitesse witness Cebulko, and NIPPC witness Gray, who propose that the Company  
7 include a CSO in the ACT.<sup>17</sup>

8 **Q. Does PacifiCorp agree that a CSO be included in the ACT at this time?**

9 A. No. While PacifiCorp is open to the continued evaluation of this as a potential  
10 option, at this time PacifiCorp has a number of concerns about how to address the  
11 specific risks associated with a CSO. PacifiCorp and PGE are different electric  
12 utilities with significantly different systems. On PacifiCorp's system, allowing the  
13 customer to choose the location of interconnection could lead to significant costs for  
14 network upgrades. Mandating the inclusion of a CSO when all risks must be borne  
15 by the utility, participants, and developers creates an unfair mandate for a voluntary  
16 program.

17 That being said, PacifiCorp is open to continued discussions and potentially  
18 allowing for a case-by-case analysis of a CSO. The risks associated with a CSO are  
19 harder to predict and control, and a one-size-fits-all approach should not be mandated.

20 During the development of the ACT program, PacifiCorp contemplated including a

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<sup>14</sup> ORS 757.607(1).

<sup>15</sup> *In the Matter of Alliance of Western Energy Consumers, Petition for Investigation Into Long-Term Direct Access Programs*, Docket No. UM 2024, filed June 10, 2019.

<sup>16</sup> e.g. *In the Matter of Rulemaking Regarding Direct Access Including 2021 HB 2021 Requirements*, Docket No. AR 651, filed Oct. 1, 2021.

<sup>17</sup> Staff/500, Bolton/9; Vitesse/200, Cebulko/26-29; and NIPPC/100, Gray/3, 8.

1 CSO, but was concerned that this created a higher risk of cost shifting among the  
2 Company, participants, and non-participating customers. Under a CSO, the  
3 participant and developer identify the location of the resource. This could lead to  
4 higher network upgrade costs, which are generally recovered from all users of  
5 PacifiCorp's transmission system, and therefore from non-participating customers.  
6 PacifiCorp should not be directed to include a blanket CSO when it cannot, at this  
7 time, identify how to address all potential risks associated with what could be a  
8 request to add a resource at any location on, or off, PacifiCorp's system.

9 **Q. Staff states that a CSO would “provide additional value to potentially interested**  
10 **customers.”<sup>18</sup> Do you agree that this is sufficient to address risk shifting**  
11 **concerns?**

12 A. No. A VRET cannot be designed simply to maximize value for interested customers.  
13 This could potentially shift costs to non-participating customers or force the utility to  
14 take on additional risk without the ability to adequately mitigate such risk. This could  
15 impact the utility's credit rating and costs of debt, which would indirectly impact non-  
16 participating customers. Simply stating that another utility has included a CSO in its  
17 VRET is not sufficient justification to mandate a similar mechanism in all VRETs.  
18 Additionally, PacifiCorp's ACT program relies on components of the PPA to mitigate  
19 risks to cost-of-service customers and the utility. Absent those protections,  
20 PacifiCorp cannot proceed with the program. Each utility has to be given the ability  
21 to identify its risk tolerance when inadequately mitigated risks can impact all  
22 customers' rates.

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<sup>18</sup> Staff/500, Bolton/9.

1 **Q. What is the basis for Vitesse’s recommendation that the Commission should**  
2 **modify the ACT to allow a customer to bring its own PPA?**

3 A. Mr. Cebulko asserts that PGE has a CSO option and that “customers are differently  
4 situated and may have unique opportunities that better meet their needs.”<sup>19</sup>

5 Mr. Cebulko adds that a CSO is appropriate in a voluntary program and that the ACT  
6 program structure protects cost-of-service customers against potential cost shifts.

7 Mr. Cebulko, however, does discuss some of the potential issues in his testimony,  
8 including transmission costs and the need for a request for proposals (RFP).

9 **Q. Are Mr. Cebulko’s arguments persuasive?**

10 A. No. Indeed, his testimony highlights some of the significant concerns. I agree with  
11 Mr. Cebulko that a CSO raises locational and project specific issues.<sup>20</sup> At this time,  
12 PacifiCorp cannot commit to an open CSO in the ACT program. The Company  
13 cannot analyze all of the potential impacts, so it simply adds too much risk.

14 PacifiCorp, however, is open to discussions with customers on a case-by-case basis,  
15 where PacifiCorp can analyze the particular project and costs, so that adequate  
16 mitigation measures to address risk and cost shifting can be addressed. The specific  
17 recommendations can then be brought before the Commission for review.

18 **Q. Does NIPPC also support the inclusion of a CSO?**

19 A. Yes. NIPPC witness Gray supports requiring PacifiCorp to include a CSO in the ACT  
20 program, and does not oppose an independent cap for that option.<sup>21</sup>

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<sup>19</sup> Vitesse/100, Cebulko/26.

<sup>20</sup> *Id.* at 28.

<sup>21</sup> NIPPC/100, Gray/8.

1 **Q. Does Mr. Gray provide a basis for this position relative to the risk to other**  
2 **customers or PacifiCorp, specifically?**

3 A. No. Mr. Gray simply points to PGE's Large Nonresidential Green Energy Affinity  
4 Rider (GEAR) program.

5 **V. ENERGY AND CAPACITY CREDIT**

6 **Q. What is the purpose of this section of your reply testimony?**

7 A. In this section of my testimony, I address the testimony of Staff witness Bolton and  
8 NIPPC witness Gray regarding the energy and capacity credit.

9 **Q. What are the proposals set forth by Staff and NIPPC?**

10 A. Staff witness Bolton proposes that Schedule 273 be modified to directly mention an  
11 energy and capacity floor or floating calculation designed to prevent the credit from  
12 exceeding a participant's cost.<sup>22</sup> Similarly, NIPPC witness Gray proposes that  
13 Schedule 273 be modified to clearly state that application of any energy and capacity  
14 credits will not result in the net reduction of costs to ACT program participants below  
15 the costs incurred by non-participating customers.<sup>23</sup>

16 **Q. How do you respond?**

17 A. PacifiCorp agrees that the credits should not exceed the participant's cost of  
18 participating in the ACT program. This is actually a key component to mitigate  
19 against creating securities compliance issues associated with participation in the  
20 program.

21 PacifiCorp also sees this as an unlikely scenario given the structure of the  
22 program. The first opportunity for ACT participants to procure resources under the

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<sup>22</sup> Staff/500, Bolton/6.

<sup>23</sup> NIPPC/100, Gray/4, 11.

1 program is expected to occur as part of PacifiCorp's 2022 All-Source Request for  
2 Proposals (2022AS RFP). The approved 2022AS RFP included language to allow for  
3 this eventuality:

4 *Following PacifiCorp's selection of resources for system customers*  
5 *and any additional resources required to meet specific state*  
6 *compliance obligations, PacifiCorp may conduct a secondary*  
7 *process to match renewable resource bids not chosen to the final*  
8 *shortlist with customers interested in voluntary renewable*  
9 *programs.*<sup>24</sup>

10 As a result, any resources whose value exceeds their cost will be procured on behalf  
11 of all customers, and thus will not be available for ACT participants. This will  
12 eliminate the potential for an ACT participant to receive a credit that exceeds their  
13 cost from a 2022AS RFP resource.

14 PacifiCorp has no objection to modifying Schedule 273 to make this more  
15 explicit, but would suggest that the Commission may find it appropriate to adjust the  
16 balance of risks and compensation among ACT program participants, non-  
17 participants, and the utility in specific circumstances, potentially using the credit  
18 value. Since the Commission would approve each Customer contract, PacifiCorp  
19 questions whether it is necessary to make the tariff more specific. This flexibility  
20 may provide an avenue for enhancing small-scale renewable generation in  
21 PacifiCorp's resource portfolio in compliance with state policy.

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<sup>24</sup> PacifiCorp's 2022 All-Source Request for Proposals, issued April 29, 2022. Section 1, pg. 2.

1           **VI. SUBSCRIBER MISMATCH FEE AND ADMINISTRATIVE FEE**

2   **Q. What is the purpose of this section of your direct testimony?**

3   A. In this section of my testimony, I address the testimony of Staff witness Bolton and  
4   CUB witness Gehrke regarding the subscriber mismatch fee and the administrative  
5   fee, respectively.

6   **Q. Regarding the subscriber mismatch fee, Staff witness Bolton requests an**  
7   **explanation of, or modification to, Schedule 273, regarding the prevention of**  
8   **accelerated cost recovery of a utility-owned resource without the participant**  
9   **receiving additional benefit.<sup>25</sup> How do you respond?**

10   A. Absent the subscriber mismatch fee, PacifiCorp would not be able to offer the ACT  
11   program due to the potential risk of undersubscription. This applies to all ACT  
12   program resources whether they are through a PPA or a Company-owned resource.  
13   PacifiCorp does not agree with Staff’s statement that the fee “would act as accelerated  
14   cost recovery ...without any reduction in overall costs to participants” in relation to  
15   Company-owned resources.<sup>26</sup> The subscriber mismatch fee ensures that other  
16   participants can continue to rely on the operation of the resource because the full cost  
17   of the resource has been committed by participants. Further, the subscriber mismatch  
18   fee is based on the net present value of the above market costs for the full duration of  
19   the contract, spread across the years to which the participants have subscribed. This  
20   takes into account the interest that will accrue over the life of the resource.  
21   Accordingly, it does not result in accelerated cost recovery because full recovery  
22   depends on the accrual of interest over the life of the resource.

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<sup>25</sup> Staff/500, Bolton/4.

<sup>26</sup> *Id.*

1 **Q. CUB witness Gehrke recommends that the revenues associated with the ACT's**  
2 **administrative fee be passed back to non-participating customers through**  
3 **PacifiCorp's annual Transition Adjustment Mechanism (TAM) proceeding.<sup>27</sup> Do**  
4 **you agree?**

5 A. I understand CUB's concern, but do not agree with the recommendation for two  
6 reasons. First, this creates a significant administrative burden and creates a risk of  
7 inaccurate cost tracking. Including the administrative fee in the TAM would require  
8 PacifiCorp to forecast participation and expenses, then any difference would flow  
9 through the Power Costs Adjustment Mechanism (PCAM). Absent a dollar-for-dollar  
10 sharing mechanism under the PCAM, it is likely that cost-of-service customers would  
11 either pay some of the costs to administer the ACT program (in the event of an under-  
12 forecast, creating a subsidy), or receive a credit without taking some of the risk (in the  
13 event of an over-forecast). Further, it would be inefficient to incorporate a forecast of  
14 costs and draft supporting testimony and documentation during each TAM. Second,  
15 administrative costs associated with the program are only tangentially associated with  
16 net power costs. We do not currently incorporate the costs associated with other  
17 customer programs or resource acquisitions in the TAM, only the ongoing PPA costs,  
18 fuel costs, market purchases, wheeling, and production tax credits.

19 **Q. Do you have an alternative recommendation to address CUB's concern?**

20 A. Yes. I believe the concerns would be more properly addressed through a deferral  
21 mechanism. A deferral ensures that administrative fee revenues are credited to cost-  
22 of-service customers. Timely crediting of this revenue to cost-of-service customers

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<sup>27</sup> CUB/200, Gehrke/35



1 can be addressed through either a subsequent general rate case, or separate  
2 amortization of the deferral between rate cases.

3 **Q. Would the credit apply to the cost-of-service rates paid by participating**  
4 **customers?**

5 A. Yes. The administrative fee revenue credit should be applied to all cost-of-service  
6 rates otherwise participating customers would be essentially paying twice for the  
7 administrative costs to implement the ACT program, while non-participating  
8 customers would receive a credit that is larger than their allocation of the original  
9 cost.

## 10 VII. COMPETITIVE BIDDING RULES

11 **Q. What is the purpose of this section of your reply testimony?**

12 A. In this section of my testimony, I address the testimony of Vitesse witness Cebulko  
13 and NIPPC witness Gray regarding the competitive bidding rules contained in Oregon  
14 Administrative Rules 860-089 and PacifiCorp's intent to secure resources for the  
15 ACT program by leveraging its existing procurement process initiated as a result of  
16 the 2021 Integrated Resource Plan, the 2022AS RFP.

17 **Q. What are the parties' positions?**

18 A. Vitesse witness Mr. Cebulko asserts that the Company can rely on the 2022AS RFP  
19 for selecting resources and it is not required to issue a second RFP for selecting ACT  
20 resources, which would be costly and add administrative burden without substantial  
21 benefit.<sup>28</sup> NIPPC witness Gray claims that the competitive bidding rules apply to the  
22 ACT and the Company can seek waivers as appropriate.<sup>29</sup>

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<sup>28</sup> Vitesse/100, Cebulko/25-26.

<sup>29</sup> NIPPC/100, Gray/3.

1 **Q. How do you respond to Vitesse witness Mr. Cebulko?**

2 A. I agree that the Company should be allowed to use the results of the 2022AS RFP to  
3 help identify resources for the ACT program. The ACT creates a voluntary renewable  
4 resource program, and expressions of customer interest received sufficiently in  
5 advance of the determination of the 2022AS RFP final shortlist can be used to  
6 identify suitable renewable resource bids. Because the 2022AS RFP has a bid  
7 validity date of November 21, 2023, negotiations with the developer and ACT  
8 participant and required Commission approvals would likely need to be completed  
9 prior to that date for analysis conducted in the RFP to be used directly. While the  
10 Company could continue to negotiate with developers and ACT program participants  
11 outside of the RFP process, changes to bid costs would be expected, as would  
12 changes in other modeling assumptions, like market prices and loads.

13 **Q. How do you respond to NIPPC witness Gray?**

14 A. PacifiCorp agrees that ACT program resources whose size and contract term make  
15 them subject to the competitive bidding rules would require compliance with those  
16 rules, including the option to seek a waiver or assert an exception. Given PacifiCorp  
17 is also proposing that the Commission approve ACT customer contracts, including  
18 rates and bill credits, PacifiCorp anticipates that any waiver requirements would be  
19 addressed at the same time.

1           **VIII. COMPLIANCE WITH VRET DESIGN CONDITION 7**

2   **Q. What is the purpose of this section of your reply testimony?**

3   A. In this section of my testimony, I address the testimony of CUB witness Gehrke and  
4   NIPPC witness Gray regarding PacifiCorp's compliance with Condition 7 of the  
5   VRET Design Conditions.

6   **Q. What are the parties' positions?**

7   A. CUB witness Gehrke argues that until Condition 7 of the Commission's VRET  
8   Design Conditions are met, no Company-owned resource should be used in the ACT  
9   program.<sup>30</sup> NIPPC witness Gray similarly claims that the Commission should  
10   reiterate the limitation on utility ownership of a VRET asset as the Company has not  
11   satisfied this condition.<sup>31</sup>

12   **Q. How do you respond?**

13   A. As Mr. Anderson stated in his direct testimony, PacifiCorp will bring a proposal of  
14   specific safeguards before the Commission for consideration before investing in any  
15   owned resource for the ACT program.<sup>32</sup> Accordingly, these arguments should not  
16   prevent approval of the ACT.

17   **Q. Do you have specific concerns over the positions raised in the testimony  
18   submitted by CUB and NIPPC regarding Condition 7?**

19   A. Yes. Condition 7 raises some significant concerns that require more detailed analysis  
20   than what was presented by either Mr. Gehrke or Mr. Gray. First of all, Condition 7 is  
21   a generic consideration that may or may not be applicable to a specific VRET

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<sup>30</sup> CUB/200, Gehrke/33-34.

<sup>31</sup> NIPPC/100, Gray/10-11.

<sup>32</sup> PacifiCorp/800, Anderson/18.

1 proposal. Condition 7’s requirement to share the return on a utility-owned VRET  
2 resource only applies if “ratepayer-funded assets [are] used to assist the voluntary  
3 renewable offering.”<sup>33</sup> PacifiCorp’s ACT requires that participants continue to pay  
4 their applicable cost-of-service rate. That means that participating customers are  
5 paying their fair share of PacifiCorp’s assets used for service and non-participating  
6 customers are held harmless. Mr. Gehrke does not assert that PacifiCorp’s proposed  
7 ACT violates Condition 8 (that all direct and indirect costs and risks are borne by the  
8 program participant, utility, and developer) and, otherwise, recommends approval of  
9 the program.<sup>34</sup>

10 Mr. Gray makes two arguments. First, Mr. Gray asserts that utility-ownership  
11 creates an incentive for the utility to favor its own projects over third-party  
12 alternatives. This argument is flawed because the requirement to follow the  
13 Commission’s competitive bidding rules mitigates against this concern. There is the  
14 potential that a utility-owned resource may be the best resource for the program and  
15 the process should not be skewed to eliminate those options at the expense of  
16 participating customers. Indeed, Condition 9 requires that the Commission ensure  
17 that these offerings are fair, just, and reasonable. If the most reasonable resource is a  
18 utility-owned resource, that should be an option.

19 Mr. Gray’s second issue is a concern that PacifiCorp will consider both PPAs  
20 and Company-owned assets as eligible renewable resources for the ACT program  
21 before approval of accounting protections. Given PacifiCorp’s commitment to seek

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<sup>33</sup> *In the Matter of Portland General Electric Company, Investigation into Proposed Green Tariff*, Docket No. UM 1953, Order No. 21-091 at 12 (Mar. 29, 2021); Order No. 21-096 (Mar. 30, 2021), correcting Order No. 21-091.

<sup>34</sup> CUB/200, Gehrke/29.

1 Commission approval of the appropriate protections for Company-owned ACT  
2 program resource, Mr. Gray's concern is misplaced. PacifiCorp should not be  
3 prohibited from trying to find the best resource for participating customers.

4 **Q. Do you have other concerns regarding the application of Condition 7 to a**  
5 **properly structured VRET?**

6 A. Yes. The arguments presented by CUB and NIPPC would essentially amount to a  
7 misalignment of costs and benefits because they do not assert that non-participating  
8 customers are incurring some cost to support the ACT program. Absent that showing,  
9 a sharing of a return on a Company-owned resource would transfer a benefit to non-  
10 participating customers without any of the risk. The only difference between a PPA  
11 and a utility-owned resource under the VRET is who gets the return on investment,  
12 and it seems fundamentally unfair to disadvantage the utility without a showing that  
13 other cost-of-service customers are subsidizing service under the VRET. Absent such  
14 a showing, there is simply no policy justification that would support a blanket  
15 confiscation of a return on an investment.

16 **IX. RESPONSE TO INDIVIDUAL PARTY ISSUES**

17 **Q. What is the purpose of this section of your reply testimony?**

18 A. In this section of my testimony, I will respond to issues raised by CUB witness  
19 Gehrke, Vitesse witness Cebulko, and NIPPC witness Gray.

20 **A. Response to CUB**

21 **Q. Does CUB support approval of the ACT?**

22 A. Yes, with certain conditions. CUB witness Gehrke's conditions include that (1) the  
23 ACT be capped at 175 aMW, (2) PacifiCorp not requesting a return on investment for

1 PPA projects used as resources under the ACT; and (3) the ACT cannot result in a net  
2 reduction in energy costs for a participant.<sup>35</sup>

3 **Q. Do you agree with Mr. Gehrke's conditions?**

4 A. Generally, yes. As Mr. Anderson stated in his direct testimony, the current cap  
5 identified in the Commission's revised VRET condition is sufficient to meet the  
6 current expected demand for participation in the ACT program. I agree with  
7 Mr. Gehrke that it is too early in the program to expand the cap. However, I am  
8 mindful that customers may not see it the same way and may fully support expansion  
9 of the program. Regardless, PacifiCorp agrees that the initial effort should be subject  
10 to the cap to ensure no cost shifting and to work through the early implementation  
11 and will bring any case-by-case considerations to the Commission for consideration.  
12 In the end, though, PacifiCorp continues to see the ACT program as an opportunity to  
13 mitigate some of the resource transition costs that would otherwise flow to customers  
14 represented by CUB. Regarding Mr. Gehrke's second recommended condition,  
15 PacifiCorp has not raised this issue and there is no need to address it. The potential  
16 for incorporating a return on a PPA for the utility is a broader policy issue that is  
17 beyond the scope of this proceeding. Finally, Mr. Gehrke supports PacifiCorp's ACT  
18 program component that participation cannot result in a net reduction in energy costs  
19 for a participant.

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<sup>35</sup> *Id.* at 34.

1           **B.       Response to Vitesse**

2           **Q.       Does Vitesse witness Cebulko provide an alternative to the Company’s proposal**  
3           **to fixing the volume at the time of signing of the PPA or resource investment**  
4           **decision for a Company-owned asset?**

5           A.       Yes. Vitesse witness Cebulko asserts that in most years, PacifiCorp will have  
6           additional energy and RECs, which it proposes to allocate to non-participating  
7           Oregon customers as a form of mitigating their risk and to ensure compliance with  
8           Condition 8.<sup>36</sup> Mr. Cebulko claims that the problem with PacifiCorp’s approach is  
9           that although the Company is assigning 100 percent of the costs of the program to the  
10          participants, it does not assign 100 percent of the benefits to the program  
11          participants.<sup>37</sup> Instead, he argues that assigning participants a percentage of the  
12          output of the facility would better mitigate risk to the non-participants and would also  
13          ensure that all benefits flow back to the participants.<sup>38</sup> As such, Vitesse witness  
14          Cebulko argues that the ACT should be modified to allow for certain customers to  
15          take variable annual delivery.<sup>39</sup>

16          **Q.       How do you respond?**

17          A.       PacifiCorp strongly recommends this not be an option at this time. PacifiCorp needs  
18          to more thoroughly review this option because it could create some additional issues  
19          related to securities regulation if the amount is not fixed at the time the customer  
20          commits to participation. I am not an expert on securities, but if there is any risk that

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<sup>36</sup> Vitesse/100, Cebulko/30.

<sup>37</sup> *Id.* at 31

<sup>38</sup> *Id.*

<sup>39</sup> *Id.* at 3, 31.

1 participation could raise securities compliance issues, PacifiCorp would not be able to  
2 offer the program without further analysis because of the additional compliance risk.

3 **Q. Do you agree that utility customers should get 100 percent of the benefits for 100**  
4 **percent of the utility's costs in rates, as claimed by Mr. Cebulko?**

5 A. It depends on the program and risks associated, generally, but PacifiCorp's ACT  
6 program is a voluntary program that must allocate risk solely among the utility,  
7 participant, and developer. PacifiCorp has designed the ACT program to include risk  
8 mitigation measures, one of which is the fixed renewable energy credit (REC)  
9 amount. In the event of under-delivery, PacifiCorp will procure unbundled RECs for  
10 participants, mitigating risk for participants. Mr. Cebulko's proposal for percentage  
11 allocation of output creates unmitigated risk to the Company. If a single entity is  
12 taking the entire output of a facility, the proposal may be workable, and PacifiCorp is  
13 willing to discuss specific options with customers if that will assist with the  
14 customer's goal and further state energy policy. As a recommendation to modify the  
15 entire ACT program, however, Vitesse's recommendation is unworkable.

16 **C. Response to NIPPC**

17 **Q. Does NIPPC witness Gray make a proposal regarding the purchase of**  
18 **unbundled RECs?**

19 A. Yes. NIPPC witness Gray alleges that the language in Section 4(a) of Schedule 273<sup>40</sup>  
20 is inconsistent with Condition 2 of the Commission's VRET Design Conditions.<sup>41</sup>

21 While acknowledging that the use of unbundled RECs may be needed in cases of

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<sup>40</sup> Schedule 273, Section 4(a) state in part: "In the event of yearly under generation from the renewable energy resource(s) facilitated through the contract, the Company will purchase renewable energy certificates (RECs) on the Customer's behalf to ensure the Customer's subscribed quantity of energy is covered."

<sup>41</sup> NIPPC/100, Gray/7.



1 truly unforeseen circumstances and unanticipated emergency disruptions, it should be  
2 expressly limited to force majeure situations.<sup>42</sup>

3 **Q. How do you respond?**

4 A. I disagree. This is a necessary component of a VRET, and consistent with what the  
5 Commission approved for PGE. Mr. Gray incorrectly states that “[i]t is worth noting  
6 that the other VRET program authorized within the state, PGE’s GEAR program,  
7 does not allow for any unbundled RECs as I understand it.”<sup>43</sup> PGE’s Schedule 55,  
8 Large Nonresidential Green Energy Affinity Rider (GEAR), general provision 3  
9 includes nearly identical language.

10 The Company shall procure Bundled Renewable Energy on the  
11 Subscribing Customer’s behalf – or through collaborative sourcing  
12 with a customer for the CSO – from a new renewable energy facility.  
13 *In the event of yearly under-generation from the renewable energy*  
14 *resource, the Company will purchase RECs on the Subscribing*  
15 *Customer’s behalf to ensure that the Customer’s subscribed amount*  
16 *is covered under this tariff.* In the event that the renewable energy  
17 supplier is no longer able to supply bundled renewable energy to the  
18 Subscribing Customer, the Company, at the election of the  
19 Subscribing Customer, shall make reasonable efforts to procure a  
20 new resource on behalf of the Subscribing Customer as soon as  
21 practicable with the cost of the renewable energy to the Subscribing  
22 Customer revised accordingly.<sup>44</sup>

23 This provision is important because it ensures that participating customers get the  
24 benefit of the bargain so any sustainability claims by the customer are verifiable and  
25 benefits of participation are identified when the decision to participate is made by the  
26 customer.

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<sup>42</sup> *Id.* at 4, 8.

<sup>43</sup> *Id.* at 8.

<sup>44</sup> PGE Schedule 55, Large Nonresidential Green Energy Affinity Rider (GEAR) (emphasis added).

1 **Q. Does NIPPC witness Gray argue that Schedule 273 should be clarified to allow**  
2 **customers that receive direct access for part of their service to purchase ACT**  
3 **service for part of their service?<sup>45</sup>**

4 A. Yes. Mr. Gray claims that PacifiCorp's treatment of direct access participants under  
5 ACT is discriminatory as there is nothing inconsistent with purchasing both direct  
6 access and ACT services and that PacifiCorp is creating an artificial barrier to  
7 competitive retail market.<sup>46</sup> Additionally, Mr. Gray asserts that the alleged  
8 discriminatory treatment is not justified by the Company's reasoning that it reduces  
9 the complexity of administering the tariff.<sup>47</sup>

10 **Q. How do you respond?**

11 A. I have two issues with this recommendation. First is the practical issue that a direct  
12 access customer has another avenue to accomplish this same goal and should not be  
13 allowed to take the relatively small space under the cap from interested cost-of-  
14 service customers. A direct access customer can simply take service from an Energy  
15 Service Supplier that commits to provide energy from renewable resources, with  
16 bundled RECs that will be retired by the energy service supplier on behalf of the  
17 direct access customer. Second, the protection against cost shifting is grounded in the  
18 participating customer continuing to pay its cost-of-service rate.

19 That being said, if Mr. Gray is simply concerned that participation in direct  
20 access for certain loads forecloses all of a customer's load (both loads on direct  
21 access and loads on cost-of-service rates) PacifiCorp would clarify that any cost-of-

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<sup>45</sup> NIPPC/100, Gray/4, 12-15.

<sup>46</sup> *Id.* at 13.

<sup>47</sup> *Id.* at 13-14.

1 service customer may seek to participate in the ACT program for its cost-of-service  
2 loads.

3 **Q. Mr. Gray points to PGE’s voluntary waiver of similar language in its GEAR**  
4 **program tariff.<sup>48</sup> Should PGE’s GEAR program implementation decisions**  
5 **determine PacifiCorp’s program requirements?**

6 A. No. PGE’s decision regarding QTS data systems was made after its review of the  
7 specific facts and circumstances associated with PGE and that customer. It is entirely  
8 inappropriate, and bad public policy, to use one utility’s factually specific business  
9 and regulatory decisions as the basis for a blanket requirement that would apply to  
10 another utility. Further, this raises procedural issues going forward by creating a  
11 regulatory environment where utilities would have to intervene in each other’s  
12 proceedings and challenge specific proposals to avoid the potential of a compromise  
13 position setting precedent.

14 **Q. NIPPC witness Gray claims that the eligibility threshold for the Company’s ACT**  
15 **should be equal to the threshold for its direct access program.<sup>49</sup> How do you**  
16 **respond?**

17 A. First, the PacifiCorp website referenced by Mr. Gray in his testimony<sup>50</sup> specially  
18 states that direct access is an option for both small businesses (those having demand  
19 less than 30 kilowatts (kW) for 12 out of the last 13 months) and large businesses  
20 (those with demand exceeding 30 kW at least twice in the last 13 months). Mr. Gray  
21 appears to solely be addressing the permanent opt-out direct access option under

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<sup>48</sup> *Id.* at 14.

<sup>49</sup> *Id.* at 4, 15-16.

<sup>50</sup> *Id.* at 16 (footnote 17).

1 PacifiCorp Schedule 296. That program, however, was limited by the Commission to  
2 large, sophisticated customers.<sup>51</sup> Accordingly, there is no basis for his assertion that  
3 the Commission should limit participation in the ACT program because there are still  
4 direct access options for non-residential customers exceeding 30 kW of demand.

5 **Q. Does this conclude your reply testimony?**

6 A. Yes.

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<sup>51</sup> *In the matter of Public Utility Commission of Oregon Investigation of Issues Relating to Direct Access*, Order No. 12-500 at 9, UM 1587 (Sec. 30, 2021) (“We acknowledge Pacific Power’s concerns that any program that allows customers to elect direct access permanently be tailored for each utility, be designed to protect other customers from cost-shifting, and be limited to large, sophisticated customers. In its tariff filing Pacific Power may tailor its program to fit its circumstances... We do not expand the class of eligible customers.”)

Docket No. UE 399  
Exhibit PAC/1800  
Witness: Kenneth L. Elder, Jr.

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Kenneth L. Elder, Jr.

July 2022

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1 **Q. Are you the same Kenneth L. Elder, Jr. who previously submitted direct**  
2 **testimony in this proceeding on behalf of PacifiCorp d/b/a Pacific Power**  
3 **(PacifiCorp or the Company)?**

4 A. Yes, I am.

5 **I. PURPOSE OF TESTIMONY**

6 **Q. What is the purpose of your reply testimony?**

7 A. My testimony responds to various issues raised about PacifiCorp's load forecast filed  
8 June 22, 2022, in the testimonies of Lloyd C. Reed, on behalf of the Klamath Water  
9 Users Association and the Oregon Farm Bureau Federation (KWUA-OFBF), and  
10 Bradley G. Mullins, on behalf of the Alliance of Western Energy Consumers  
11 (AWEC).

12 **A. Response to KWUA-OFBF**

13 **Q. Does KWUA-OFBF witness Mr. Reed<sup>1</sup> raise a concern regarding Schedule 41**  
14 **irrigation annual temperature normalized load for the Calendar Year 2023 Rate**  
15 **Period?**

16 A. Yes. Mr. Reed is concerned that the Company's test year forecast for Schedule 41 of  
17 265,565 megawatt hours (MWh) may be overstated.

18 **Q. How do you respond?**

19 A. In reviewing the load forecast for Schedule 41 to respond to Mr. Reed's testimony, I  
20 identified an anomaly in the data that impacted Schedule 41 load. The Company first  
21 creates the class level forecast for the irrigation class using regression modeling  
22 techniques that rely on multiple years of actual data and then apportions the class

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<sup>1</sup> KWUA-OFBF/100, Reed/12-13.

1 level sales to the individual rate schedules using the most recent rate schedule actual  
2 data (typically one or two years). Specifically, the irrigation class level sales are  
3 apportioned to rate Schedules 41, 48 and 23.

4 In modeling the irrigation class level data, the Company noted that 2020 was  
5 an anomalous year and corrected for it at the class level. However, at the rate  
6 schedule level, the anomaly disproportionately affected rate Schedule 48 loads  
7 forcing additional load into Schedule 41.

8 **Q. How does the Company propose to correct for this issue?**

9 A. The Company extended the number of years used to apportion the class level forecast  
10 to use rate schedule actual data over a four-year time frame (April 2017 to March  
11 2021), rather than the original one-year timeframe (April 2020 to March 2021).  
12 Using a monthly average over the preceding four years as the basis for irrigation rate  
13 schedule allocation results in an overall Schedule 41 test year forecast of  
14 234,973 MWh. This updated rate schedule forecast for the irrigation class was then  
15 used by the Company to update present revenues and the cost-of-service and rate  
16 design models, as discussed in the reply testimony of Robert M. Meredith.

17 **B. Response to AWEC**

18 **Q. Please respond to Mr. Mullins'<sup>2</sup> claim that Utah Demand-Side Management**  
19 **(DSM) programs already consider customer use for Utah DSM programs and an**  
20 **adjustment to loads used to calculate Utah's' dynamic load-based allocation**  
21 **factors is unnecessary.**

22 A. Mr. Mullins' claim is based on an incorrect understanding of how the Company treats

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<sup>2</sup> AWEC/100, Mullins/25.



1 DSM programs under the 2020 Protocol. The adjustments proposed by the Company  
2 for calculating Load-Based Dynamic Allocation Factors are for Class 1 DSM  
3 (Demand Response) programs. When the Company produces its peak forecasts,  
4 historical Class 1 DSM is added into the historical jurisdictional peak loads to  
5 produce an uncurtailed peak forecast. Therefore, the Company then adjusts the peak  
6 forecast downward to account for the Class 1 DSM programs when calculating  
7 jurisdictional allocation factors. Mr. Mullins' assertion erroneously assumes that the  
8 initial peak forecast includes curtailed generation consistent with the Class 1 DSM.  
9 Because Mr. Mullins has provided no evidence that the peak forecast incorrectly  
10 accounted for Utah DSM programs, this adjustment should be rejected.

11 **Q. Does this conclude your reply testimony?**

12 A. Yes.

**REDACTED**

Docket No. UE 399

Exhibit PAC/1900

Witness: James Owen

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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**REDACTED**

Reply Testimony of James Owen

July 2022

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1                                   **I.       INTRODUCTION AND SUMMARY**

2   **Q.     Please state your name, business address, and present position with PacifiCorp d/b/a**  
3       **Pacific Power (PacifiCorp or the Company).**

4   A.    My name is James Owen. My business address is 1407 West North Temple, Suite 210,  
5       Salt Lake City, Utah 84116. My title is Vice President of Environmental, Fuels, and  
6       Mining.

7   **Q.     Please describe your education and professional experience.**

8   A.    I have a Bachelor of Science Degree in Mining Engineering, a Master of Business  
9       Administration Degree, and a Juris Doctor of Law Degree, all from the University of  
10       Utah. I joined the Utah Department of Natural Resources – Division of Oil Gas and  
11       Mining in November 2008, and held positions of increasing responsibility within the  
12       agency, including responsibilities for environmental permitting, enforcement of  
13       environmental compliance, engineering design, oversight of mine reclamation bonding,  
14       environmental program management, and legislative and policy management. I joined  
15       PacifiCorp as Director of Environmental in February 2018. I have assumed positions of  
16       increasing responsibility since that time and currently serve as Vice President of  
17       Environmental, Fuels, and Mining. My current responsibilities encompass strategic  
18       planning, stakeholder engagement, regulatory support, support of major generation  
19       resource additions, direct oversight of fueling strategy, management of mining  
20       operations, and direct oversight of major environmental compliance projects.

1 **Q. Have you testified in other regulatory proceedings?**

2 A. Yes. I have provided testimony on behalf of the Company in proceedings before the  
3 Public Utility Commission of Oregon (Commission or OPUC) and the public utility  
4 commissions in Utah, Idaho, California, and Wyoming.

5 **Q. What is the purpose of your reply testimony in this case?**

6 A. I respond to the opening testimony of Moya Enright, filed on behalf of Commission Staff  
7 (Staff), and Bradley G. Mullins, filed on behalf of the Alliance of Western Energy  
8 Consumers (AWEC).

9 **Q. Please summarize your reply testimony.**

10 A. In my testimony, I demonstrate that:

- 11 • Staff's recommendation regarding updates to the Company's Coal Inventory  
12 Policies and Procedures is unnecessary and redundant because the Company  
13 already updates its fuel stock inventory policies annually;
- 14 • AWEC's assertion that the Company has imprudently managed the Trapper Mine  
15 is both incorrect and unsupported;
- 16 • AWEC's proposal to use the fuel stock forecast as of December 2022, instead of  
17 the 13-month period ending December 2023, is based on inaccurate statements—  
18 including that the forecast represents a cost increase—and would result in an  
19 unjustified mismatch with both the test period in this case and the test period in  
20 the 2023 Transition Adjustment Mechanism (TAM);
- 21 • The Company has updated its fuel stock forecast in this case to reflect the latest  
22 information from the 2023 TAM Reply Update. This update decreases the fuel

1 stock forecast by \$22.9 million to \$151.6 million, further undermining AWEC's  
2 position that the fuel stock forecast reflects an unreasonable cost increase; and

- 3 • AWEC's claim that the Rock Garden coal pile associated with the Hunter and  
4 Huntington plants is not currently used and useful is demonstrably wrong given  
5 the Company's current reliance on that coal pile to meet generation levels at those  
6 plants in 2022.
- 7 • Contrary to AWEC's claims, the costs included in PacifiCorp's environmental  
8 remediation regulatory assets are prudent and capture the reasonable and ongoing  
9 costs of providing electric service in an environmentally compliant manner.

## 10 II. RESPONSE TO STAFF'S RECOMMENDATION

11 **Q. Does Staff propose any adjustment to the Company's fuel stock forecast for the**  
12 **2023 test period?**

13 A. No. Staff reviewed the Company's fuel stock forecast and found it reasonable. Staff did  
14 raise the concern that as the Company retires multiple coal plants in the coming 10 years,  
15 the Company should reduce its fuel stock costs to fall in line with these changes.<sup>1</sup>

16 **Q. Please describe Staff's recommendation related to the Company's fuel stock**  
17 **policies.**

18 A. Staff recommends that during the 12 months leading up to the Company's next general  
19 rate case (Rate Case) filing, that the Company "be required to update its Coal Inventory  
20 Policies and Procedures."<sup>2</sup>

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<sup>1</sup> Staff/900, Enright/5.

<sup>2</sup> Staff/900, Enright/5.

1 **Q. Do you agree with Staff's recommendation?**

2 A. No. Staff's recommendation is unnecessary and redundant because the Company already  
3 updates its Coal Inventory Policies and Procedures on an annual basis to ensure the  
4 accuracy of its fuel stock forecast. Thus, during the 12-month period leading up to the  
5 next Rate Case, the Company would have already updated its Coal Inventory Policies and  
6 Procedures, regardless of Staff's recommendation. Staff's recommendation is therefore  
7 unwarranted.

8 **III. RESPONSE TO AWEC'S ADJUSTMENTS**

9 **A. Trapper Mine Prudence**

10 **Q. Please describe PacifiCorp's co-ownership of the Trapper Mine.**

11 A. The Trapper Mine is an affiliate captive mine owned by three of the five Craig plant  
12 owners, including PacifiCorp. PacifiCorp owns 29.14 percent of the mine. The Trapper  
13 Mine supplies coal to the Craig Power Plant (Craig).

14 **Q. Please describe PacifiCorp's role in the operation of the Trapper Mine.**

15 A. Although PacifiCorp is part-owner of the mine, it is not the mine operator, nor does it  
16 participate in the mine's day-to-day operations.

17 **Q. If PacifiCorp is not active in the operation of Trapper Mine, how does the Company  
18 ensure that it is prudently managed?**

19 A. PacifiCorp has employee representatives, including myself, who are members of the  
20 Trapper Mining, Inc. Board of Directors (Trapper Board or Board). The Trapper Board  
21 meets quarterly to review and provide direction to the Trapper Mine's executive  
22 leadership team for matters related to the operation and maintenance of the Trapper Mine.  
23 PacifiCorp's voting authority on the Board represents its ownership interest, and its

1 Board representatives vote and provide direction to ensure prudent management.  
2 PacifiCorp is well-positioned and equipped to provide direction to the Trapper Mine  
3 because of its own experience prudently managing and operating the Jim Bridger Mine.  
4 PacifiCorp staff also review annual budget information provided by the Trapper Mine  
5 and maintain on-going contact with Trapper Mine management to address any relevant  
6 issues that may arise.

7 **Q. AWEC asserts that the Company has failed to provide sufficient evidence that the**  
8 **Company is prudently managing the operations at the Trapper Mine.<sup>3</sup> How do you**  
9 **respond?**

10 A. I disagree with AWEC’s assertion, which contains no specific allegations of imprudence.  
11 The Trapper Mine is prudently managed, as evidenced by its reliable production and  
12 relatively low-cost coal. The current price of Trapper Mine coal is approximately  
13 █████ per ton cheaper than the current price of market alternatives for delivery during  
14 fourth quarter 2022 as published in recent coal pricing publications. The forecast average  
15 cost for generation for Craig Units 1 and 2 in 2023 is █████ and  
16 █████, respectively,<sup>4</sup> well below the average costs of PacifiCorp’s gas-fueled  
17 plants,<sup>5</sup> and at the low end of average coal plant costs. The production and cost of  
18 mining at the Trapper Mine are consistent with what could be expected for a prudently  
19 managed mine.

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<sup>3</sup> AWEC/100, Mullins/16.

<sup>4</sup> UE 400, PAC/600, Mitchell/92 (Confidential).

<sup>5</sup> UE 400, PAC/600, Mitchell/92 (Confidential).



1 **Q. Did PacifiCorp provide forecasted and historical financial data in this case to**  
2 **support the costs of the Trapper Mine?**

3 A. Yes. PacifiCorp provided the Trapper Mine rate base calculations in Exhibit PAC/1002,  
4 Cheung/200-202, financial statements for 2021, Trapper Board meeting minutes from  
5 2022, and the budget summary for 2022.

6 **Q. Was the level of information provided in this Rate Case consistent with the**  
7 **information provided in prior filings?**

8 A. Yes. The Trapper Mine has been in Oregon rates for many years. PacifiCorp provided a  
9 similar level of detail in this case as it did in prior rate cases, and the Trapper Mine's  
10 costs have always been deemed prudent. AWEC has not shown why the Commission  
11 should reopen this issue when there are no material changes in operation or costs at the  
12 Trapper Mine expected in the 2023 test period.

13 **Q. AWEC served several data requests (DRs) for additional information for the costs**  
14 **associated with Trapper Mine. Did PacifiCorp provide additional information in**  
15 **response to those DRs?**

16 A. Yes, PacifiCorp provided detailed cost information in response to these DRs, including a  
17 breakdown of income, cash flow, and final reclamation liability balances.<sup>6</sup> However, in  
18 one instance the Company was unable to provide the information AWEC requested  
19 because Trapper Mine does not maintain that information.<sup>7</sup>

---

<sup>6</sup> See AWEC/103, Mullins/9-18 (Confidential).

<sup>7</sup> AWEC/103, Mullins/14 (Confidential).

1 **Q. PacifiCorp was unable to provide information regarding the pits being mined and**  
2 **the date that mining began at each pit.<sup>8</sup> Please explain why this information is**  
3 **unnecessary to support the mine's prudent management.**

4 A. While data concerning the specific date when mining began at specific pits is  
5 informative, it is also trivial in this context. The fact that Trapper Mine does not have a  
6 report with this detailed information is not evidence that the mine is improperly managed.  
7 Reports from Trapper of the sequence of mining operations can be made available,  
8 however, at the time of AWEC's DR, the mine did not have the date operations began for  
9 each mining area and pit readily accessible. Ultimately, that data is of minimal  
10 significance because the most important factors relating to prudent management of a coal  
11 mine are the periodic and ongoing review of safe and reliable operations, sufficient coal  
12 production, and the economic / financial plans supporting that operation and production.

13 PacifiCorp and the other owners of the Trapper Mine empower the mine  
14 management team to engineer the best plans to achieve the least-cost, risk-adjusted coal  
15 supply to the Craig plant. Those plans are subject to Trapper Board oversight and  
16 review. As an owner of the mine with a minority share and Board representation,  
17 PacifiCorp has the opportunity and responsibility to review and provide direction,  
18 commensurate with its voting authority, regarding the annual budget and mining plans.  
19 However, that does not mean every operational aspect will be micro-managed. It is  
20 important to note that PacifiCorp does not experience the same level of operational  
21 control over the Trapper Mine as at the Bridger Mine where PacifiCorp is the operator  
22 and majority owner.

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<sup>8</sup> AWEC/100, Mullins/17.

1 **Q. AWEC recommends that the Commission should disallow 50 percent of the rate**  
2 **base and corresponding depreciation expenses at the Trapper Mine, “[g]iven**  
3 **PacifiCorp’s inability to provide concrete information demonstrating that the mine**  
4 **is being prudently managed.”<sup>9</sup> How do you respond?**

5 A. The recommended adjustment is arbitrary and completely unfounded. The Trapper Mine  
6 is a reliable, low-cost source of fuel for the Craig plant, and the mine has been reflected  
7 in rates for many years as a prudent investment. PacifiCorp has adequate and qualified  
8 resources dedicated to ensuring ongoing prudence. For example, I serve as a member of  
9 the Trapper Board which provides executive oversight of the Trapper Mine. The  
10 prudence of that oversight is directly informed by my experience providing prudent  
11 executive management of the Jim Bridger Mine. PacifiCorp has and will continue to  
12 dedicate adequate resources to represent PacifiCorp’s interest at Trapper. AWEC has not  
13 pointed to any major changes in Trapper Mine operation or costs that warrant  
14 reconsideration of the prudence of this investment. Therefore, no disallowance of these  
15 costs is appropriate.

16 **B. Fuel Stock Forecast**

17 **Q. Over what test period is the forecasted fuel stock balance calculated?**

18 A. As addressed in the reply testimony of Company witness Sherona L. Cheung, the fuel  
19 stock inventory in this case is based on a 13-month average, ending 2023, which matches  
20 the forecasted 2023 test year for this case and for the 2023 TAM, docket UE 400.

21 **Q. Is AWEC’s statement regarding the period over which the forecast test year is**  
22 **calculated accurate?**

---

<sup>9</sup> AWEC/100, Mullins/16.

1 A. No. AWEC states that PacifiCorp is requesting a fuel stock based “on a forecast of 13-  
2 month average balances over the year ending December 2022” and that “PacifiCorp’s  
3 inputs were based on the average fuel stock balances forecast over the 12-months ending  
4 December 2023.”<sup>10</sup> In fact, the fuel stock balance is based on a forecast of 13-month  
5 average balances, not 12 months, for the year ending December 2023, not 2022.

6 **Q. AWEC asserts that the forecast for fuel stock reflects a 16.4 percent increase.<sup>11</sup> Is  
7 this correct?**

8 A. No. The Company’s fuel stock balance in the initial filing was forecasted to *increase* by  
9 1.1 percent over the balance now in rates.<sup>12</sup> Furthermore, the Company has updated its  
10 fuel stock forecast in this update filing due to emerging supply issues that have had a  
11 significant impact on forecasted fuel stock balances. This update reduced the fuel stock  
12 forecast from \$174.6 million to \$151.6 million, which represents a decrease of  
13 12.1 percent when compared to the balance currently in rates.

14 **Q. AWEC further asserts that the fuel stock at the Hunter plant is forecasted to  
15 increase by 40.5 percent.<sup>13</sup> Is this an accurate statement?**

16 A. No, Hunter’s fuel stock balance in the initial filing was forecasted to increase by  
17 1.4 percent over the amount currently in rates. In addition, the reply forecast update  
18 reflects a decrease in the Hunter fuel stock balance of 65.5 percent versus the amount  
19 currently in rates. The increase in the Hunter fuel stock over the test period from  
20 December 2022 to December 2023 reflects efforts to get the balance closer to the target

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<sup>10</sup> AWEC/100, Mullins/17 (emphasis added).

<sup>11</sup> AWEC/100, Mullins/17-18.

<sup>12</sup> See UE-399, Initial Filing, Workpaper 8.15 – Miscellaneous Rate Base and UE-374, Initial Filing, Workpaper 8.6 – Miscellaneous Rate Base.

<sup>13</sup> AWEC/100, Mullins/18.

1 inventory level as supply shortages are eased.

2 **Q. PacifiCorp previously stated in a DR response that no updates were expected to be**  
3 **filed for fuel stock in this proceeding. Why is a fuel stock update now being**  
4 **provided?**

5 A. Since the time this DR response was provided there have been significant changes to the  
6 supply outlook and an update to fuel stock balances was deemed relevant. This update  
7 results in a decrease to fuel stock balances of \$22.9 million when compared to the initial  
8 filing.

9 **C. Rock Garden Coal Pile**

10 **Q. What coal resources provide fuel stock to the Hunter and Huntington plants?**

11 A. The Hunter and Huntington plants rely on fuel stock located at the plants. Additionally,  
12 these plants rely on the Rock Garden coal pile which is located approximately two miles  
13 from the Huntington plant and 20 miles from the Hunter plant.

14 **Q. What is the purpose of the Rock Garden coal pile?**

15 A. The sole purpose of the Rock Garden coal pile is to provide coal fuel stock to the  
16 Huntington and Hunter plants. The Company relies on the Rock Garden coal pile as a  
17 safety pile to mitigate risks in underground mining operations in Utah, and risks  
18 associated with potential supply interruption from third-party coal mines.

19 **Q. Has the Company included the Rock Garden coal pile in its revenue requirement in**  
20 **past Rate Case filings?**

21 A. Yes, the Rock Garden coal fuel stock costs were included in docket UE 374, the 2021  
22 Rate Case filing, and no party challenged these costs.

1 **Q. On the rate base balances for fuel stock provided in Cheung workpaper “8.15 –**  
2 **Miscellaneous Rate Base”, the Company lists Rock Garden in the same column as**  
3 **the Company’s plants. Please clarify why the Rock Garden pile is listed with the**  
4 **Company’s plants.**

5 A. While the Rock Garden is located in close proximity to the Huntington plant, it is not  
6 located on site at this plant. Since there is no plant where the Rock Garden balance can  
7 be included, a line was added in the workpaper in order to include the Rock Garden  
8 amount in the total-company balances. As previously mentioned, the Rock Garden  
9 stockpile serves as a safety pile for the Huntington and Hunter plants to reduce supply  
10 risks.

11 **Q. AWEC asserts that the Rock Garden pile is a “safety” pile, and therefore it is not**  
12 **currently used and useful.<sup>14</sup> Is this an accurate classification?**

13 A. No. While the Company classifies the Rock Garden pile as a “safety pile,” the Hunter  
14 and Huntington plants are actively utilizing the Rock Garden pile to reduce customer  
15 exposure to higher net power costs. In fact, the Rock Garden fuel stock is currently being  
16 transported to the Huntington plant to remedy balance shortages caused by high  
17 generation demand and supply constraints at both the Hunter and Huntington plants.  
18 These circumstances demonstrate that the Rock Garden safety pile provides valuable  
19 benefits to customers by providing additional flexibility to respond to supply risks.

20 **Q. AWEC recommends that the Rock Garden coal pile be removed from the revenue**  
21 **requirement and classified as plant held for future use.<sup>15</sup> Please respond.**

---

<sup>14</sup> AWEC/100, Mullins/18. AWEC/103, Mullins/26 (Confidential).

<sup>15</sup> AWEC/100, Mullins/18.

1 A. AWEC’s recommendation is contrary to basic ratemaking principles. The Rock Garden  
2 coal pile is currently being utilized by the Hunter and Huntington plants, and it is  
3 therefore used and useful. It would be inappropriate for the coal pile to be considered  
4 plant held for future use.

5 **Q. AWEC states that the fuel stock balances for the Hunter and Huntington plants are**  
6 **“some of the highest fuel stock balances of the entire fleet.”<sup>16</sup> Why is the Rock**  
7 **Garden pile currently used and useful if this is the case?**

8 A. If a complete supply disruption were to occur at the Hunter or Huntington plant, the fuel  
9 stock balance could be completely depleted in a matter of months. As mentioned above,  
10 the Rock Garden fuel stock provides important protection from the higher net power  
11 costs that would likely result in the event of an extended supply disruption.

12 **Q. Why does the Company need to utilize the Rock Garden fuel stock when the Hunter**  
13 **and Huntington plant coal stock is forecasted to decrease?**

14 A. Although the balance of the coal fuel stock for the Hunter and Huntington plants are  
15 projected to decrease, the Company will continue to rely on the Rock Garden coal pile to  
16 make up for any fuel stock delivery shortfalls.

17 **D. Environmental Regulatory Assets**

18 **Q. AWEC challenges the Company’s treatment of environmental remediation costs,**  
19 **claiming that these “types of costs appear, on their face, to be imprudent**  
20 **expenditures,” so including them in a regulatory asset without specific Commission**  
21 **approval is inappropriate.<sup>17</sup> How has the Company structured its response to this**  
22 **issue?**

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<sup>16</sup> AWEC/100, Mullins/19.

<sup>17</sup> AWEC/100, Mullins/9.

1 A. In Ms. Cheung's reply testimony, she responds to AWEC's challenge to the regulatory  
2 treatment of PacifiCorp's environmental remediation costs. I rebut AWEC's contention  
3 that these types of costs are facially imprudent.

4 **Q. Please describe the types of costs included in PacifiCorp's regulatory assets for  
5 environmental remediation costs.**

6 A. These include but are not limited to costs associated with ongoing maintenance,  
7 monitoring, sampling, assessment, evaluation, investigation, correction, treatment,  
8 stabilization, reclamation, and remediation of sites that have experienced environmental  
9 impacts, such as contamination. These sites range from industrial locations that were in  
10 operation as early as 1887 for which PacifiCorp has assumed responsibility, to facilities  
11 that PacifiCorp is currently operating. They are sites for which PacifiCorp has an  
12 obligation under state or federal environmental law to conduct corrective environmental  
13 remediation.

14 **Q. Have these costs been lawfully imposed by another government agency?**

15 A. Yes, and in many cases the environmental impacts are legacy impacts and occurred prior  
16 to the existence of applicable environmental regulation. In all cases the costs are to  
17 maintain compliance with state and federal environmental regulations, including but not  
18 limited to the state requirements, the Clean Water Act, the Resource Conservation and  
19 Recovery Act, the Comprehensive Environmental Response, Compensation, and Liability  
20 Act, and other applicable laws & regulations.

21 **Q. Are these costs associated with the prudent operation of the Company's facilities?**

22 A. Yes. The Company's operations are subject to extensive environmental regulation.  
23 These regulatory assets generally include the costs of environmental compliance and are



1 reasonable, necessary, and ongoing business expenditures. AWEC asserts that an  
2 assumption of PacifiCorp prudently operating its system will inherently also assume  
3 avoidance of all environmental failures, thus making past and ongoing environmental  
4 remediation costs “non-recurring in nature” and therefore non-recoverable through  
5 general rates.<sup>18</sup> This assertion is neither practical nor reflective of reality. It would be  
6 impractical to assume that a complex industrial entity like PacifiCorp could operate  
7 hundreds of facilities over an expansive service territory over decades of time without  
8 having any environmental failures. To be clear, PacifiCorp expends a significant amount  
9 of money and resources and makes great effort to avoid causing environmental impacts,  
10 and it maintains strict environmental compliance, but some impacts have occurred, and  
11 recurring correction of those impacts or future impacts can be expected to occur, however  
12 minimal. This does not equate to imprudence. State and federal laws are designed to  
13 minimize environmental impacts of industrial operations, but also anticipate the need for  
14 correction and are structured to require operators to retain ongoing responsibility for  
15 remediation when environmental impacts do occur. Requirements such as monitoring,  
16 sampling, and corrective actions are clearly recurring in nature. The environmental  
17 remediation costs represent PacifiCorp’s prudence in taking responsibility and  
18 maintaining compliance with laws that govern environmental remediation requirements.

19 **Q. AWEC points to a list of expenditures provided in response to AWEC DR 02 and**  
20 **specifically calls out the following costs as apparently imprudent: oil leaks at the**  
21 **Wyodak power plant, contaminated groundwater from a gasoline leak, remediation**

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<sup>18</sup> AWEC/100, Mullins/11.

1 **costs at Klamath Falls, and a leak of creosote into groundwater at an Idaho pole**  
2 **yard.<sup>19</sup> Are these costs imprudent as AWEC alleges?**

3 A. No. As stated above, it would be impractical to assume a complex entity like PacifiCorp  
4 could operate hundreds of facilities over an expansive service territory over decades, if  
5 not 100 or more years without having any need for environmental remediation. The  
6 scope of the examples cited by AWEC provides a great example demonstrating this  
7 concept. They include a power pole yard in Idaho which had legacy groundwater  
8 contamination impacts dating back to 1930, hydro facilities and dams in Oregon with  
9 legacy site contamination, and a coal-fired power plant in Wyoming that experienced  
10 leaks from fuel oil lines in 2010. It should be noted that two of the examples cited by  
11 AWEC are instances where PacifiCorp is remediating environmental impacts that  
12 occurred prior to the existence of the applicable environmental law. While such events  
13 are avoided wherever possible, they are an inherent part of providing electric utility  
14 services at the scale and breadth that PacifiCorp provides. Once they have occurred it is  
15 prudent for them to be mitigated and remediated. In each case cited by AWEC, the  
16 Company has taken responsibility for remediation of the environmental impacts, and  
17 maintains that they are reasonable, necessary, and part of ongoing business expenses.

18 **Q. AWEC also contends that the Company’s environmental remediation costs are not**  
19 **recurring and prudent, and instead represent “oil spills and other environmental**  
20 **failures” that should not be built into rates.<sup>20</sup> Please respond.**

21 A. As Ms. Cheung explains, the long-standing regulatory treatment of these costs captures  
22 the recurring but variable nature of these costs, while allowing PacifiCorp a fair

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<sup>19</sup> AWEC/100, Mullins/9.

<sup>20</sup> AWEC/100, Mullins/11.

1 opportunity for cost recovery. As I explain above, environmental remediation costs are  
2 an inherent cost in providing electric utility service and represent environmental  
3 stewardship, not environmental failure.

4 **Q. Does this conclude your reply testimony?**

5 A. Yes.

Docket No. UE 399  
Exhibit PAC/2000  
Witness: Sherona L. Cheung

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Sherona L. Cheung

July 2022

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**ATTACHED EXHIBITS**

Exhibit PAC/2001—Revenue Requirement Summary

Exhibit PAC/2002—Oregon Results of Operations – December 2023

Confidential Exhibit PAC/2003—Wage and Employee Benefits Escalators

Confidential Exhibit PAC/2004—Deferral Amortization Schedules

Exhibit PAC/2005—UE 147 Environmental Regulatory Asset Adjustment

Exhibit PAC/2006—December 2021 Regulatory Assets & Liabilities Schedule

Exhibit PAC/2007—PacifiCorp’s response to OPUC data request 362

1 **Q. Are you the same Sherona L. Cheung who submitted direct testimony in this**  
2 **case on behalf of PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company)?**

3 A. Yes.

4 **I. PURPOSE AND SUMMARY OF TESTIMONY**

5 **Q. What is the purpose of your reply testimony?**

6 A. The purpose of my testimony is to quantify the updates and revisions made to the  
7 Company's proposed revenue requirement in the current rate filing.

8 **Q. Please summarize your testimony.**

9 A. My testimony explains and supports the Company's revised overall revenue  
10 requirement increase of \$86.4 million in this general rate case (GRC), before the  
11 application of the limiting cap described below and in the reply testimony of  
12 Ms. Joelle R. Steward. This is an of increase of \$9.7 million from the amount  
13 requested in the Company's initial filing, excluding amounts requested in base  
14 revenue requirement for amortization of various deferral applications. As noted  
15 below, the Company's base rate increase request will be limited to \$76.7 million. My  
16 testimony discusses the revisions made to revenue requirement components in this  
17 modified revenue requirement, as well as addresses several proposals made by Staff  
18 of the Public Utility Commission of Oregon (Staff), and Alliance of Western Energy  
19 Consumers (AWEC).

20 **Q. Is the Company's revised requested price change set at the calculated revenue**  
21 **requirement in reply?**

22 A. No. The Company's revised overall revenue requirement in its reply filing is  
23 calculated to be \$86.4 million. However, as discussed in the reply testimony of

1 Company witness Ms. Steward, the Company is proposing to limit its increase to base  
2 revenue requirement at \$76.7 million. This amount represents the Company's direct  
3 filing request of \$84.4 million, less \$7.7 million for deferral amortizations that the  
4 Company is agreeing to move to separate rate schedules for amortization in the Test  
5 Period. It also does not include amortization of the  
6 COVID-19 deferral proposed by Staff, which is discussed further later in my  
7 testimony.

## 8 II. REVENUE REQUIREMENT

9 **Q. Please describe the calculation of the revised overall revenue increase.**

10 A. The Company's revised revenue increase of \$86.4 million is calculated using  
11 PacifiCorp's 2020 Inter-Jurisdictional Allocation Protocol (2020 Protocol) allocation  
12 methodology. As stated in my direct testimony, this rate filing was compiled using  
13 historical accounting information from the 12 months ended June 30, 2021 (Base  
14 Period), as a starting point. The historical information is then analyzed and adjusted  
15 to reflect known, measurable, anticipated changes, and to include previous Public  
16 Utility Commission of Oregon (Commission or OPUC)-ordered adjustments. Since  
17 the Company's initial filing, several changes have been made to modify the requested  
18 revenue increase. Exhibit PAC/2001 provides a summary of the Company's updated  
19 Oregon-allocated results of operations for the forecast period of the 12 months ending  
20 December 31, 2023 (Test Period). In support of the revised calculations, Exhibit  
21 PAC/2002 incorporates revisions and updates to certain adjustments and provides  
22 updated iterations of workpapers that were presented in Exhibit No. PAC/1002 but  
23 now support the Company's reply revenue requirement calculations.



1 **Q. Please provide an overview of the revisions made to the Company's revenue**  
2 **requirement in this proceeding.**

3 A. In addition to the adjustments reflected in the Company's initial filing, several  
4 revisions or updates have been made to revenue requirement in the Company's reply  
5 filing. Each revision or update is described in more detail later in this testimony.

6 Table 1 summarizes the impact of each change to the updated revenue requirement.

7 Because of these revisions and updates, the Company's revenue requirement  
8 allocation model also automatically synchronized two other adjustments to account  
9 for cascaded changes in Interest Expense and Cash Working Capital calculations.

10 **Q. Are there revisions made to the Company's revenue requirement calculations**  
11 **that are not reflected in discrete adjustments described in the sections below.**

12 A. Yes, in addition to revised adjustments, the Company also made three revisions to its  
13 Jurisdictional Allocation Model (JAM). The first of these revisions reflects a  
14 correction to the interest calculation that was identified by Staff witness  
15 Mr. John L. Fox in OPUC data request 157.

16 The second revision was an update to jurisdictional allocation factor inputs  
17 that was incorporated in the Company's concurrent Transition Adjustment  
18 Mechanism (TAM) filing, docket UE 400. Since its direct filing, the Company has  
19 become aware of a delay in the in-service date beyond 2023 for new dedicated solar  
20 generation facilities, previously expected to be placed online by the rate effective  
21 period of this case, associated with a specific customer that would have offset Utah's  
22 jurisdictional load in the calculation of allocation factors for the Test Period. For this  
23 reason, that anticipated generation offset previously included as a reduction to Utah's

1 jurisdictional load factors has now been removed. This update results in a net  
2 reduction in revenue requirement to Oregon customers, as quantified in Table 1  
3 below.

4 Finally, cost of debt embedded in the revenue requirement calculation in this  
5 reply filing has been updated to reflect 4.717 percent as recommended by  
6 Ms. Nikki L. Kobliha in her reply testimony. The impact of this update is also  
7 quantified in Table 1.

8 **TABLE 1—Reply Revenue Requirement Increase**

	GRC
<b>Revenue Requirement (FILED)</b>	\$ 84.4
<b>Corrections:</b>	
Interest Sync Correction	(1.3)
Remove AMI Replacement Amort.	(1.0)
Remove Clean Fuels Prog. Amort.	(1.3)
<b>Updates:</b>	
Cost of L/T Debt	7.0
Present Revenues Update	3.5
Escalation Factors	2.8
Pension Non-Service Exp.	1.8
TAM Revenue Sensitive	0.9
Wages & Benefits	0.7
Deferral Amort. to Tariff	(7.7)
Jurisdictional Loads Update	(2.1)
Fuel Stock Update	(0.5)
Remove Merwin In-Lieu	(0.4)
Ocat & Metro BIT	(0.3)
Other Updates	(0.1)
<b>Reply Revenue Requirement</b>	<b>\$ 86.4</b>
Reduction from Reply Rev. Req.	\$ (9.7)
<b>Requested Price Change (REPLY)</b>	<b>\$ 76.7</b>

1 **Q. Please describe Exhibit PAC/2002.**

2 A. Exhibit PAC/2002 is the Company's Oregon Results of Operations Report (Report),  
3 revised to incorporate changes and updates outlined in the table above. The Report is  
4 organized in a manner similar to Exhibit PAC/1002:

- 5 • Tab 1 (Summary) reflects the Oregon-allocated results based on the  
6 2020 Protocol.
- 7 • Tab 2 (Results of Operations) details the Company's overall reply revenue  
8 requirement by Federal Energy Regulatory Commission (FERC) account and 2020  
9 Protocol allocation factor.
- 10 • Tabs 3 through 8 and Tab R provide supporting documentation for adjustments that  
11 have been revised in the calculation of the Company's reply revenue requirement.  
12 New lead sheets are provided for those adjustments that are only being updated for  
13 allocation factor changes as a result of revisions made to the Company's revenue  
14 requirement calculation, and an update to jurisdiction load factors calculation  
15 discussed in my testimony.
- 16 • Tab 10 (Allocation Factors) reflects updates to allocation factors as a result of  
17 revisions made to the Company's revenue requirement in reply, primarily to the  
18 update to jurisdictional load factors calculation as described above, and plant-based  
19 allocation factors updated as a result of other revisions made.

1       **III. DESCRIPTION OF UPDATED & OTHER PROPOSED ADJUSTMENTS**

2       **A. TAB 3 - Revenues**

3       **Q. Has any party proposed revisions to the Company's filed revenues in this GRC?**

4       A. No, not directly. However, Klamath Water Users Association and Oregon Farm  
5       Bureau Federation (KWUA-OFBF) recommended changes within the irrigation class  
6       related to retail loads that necessitated an update to the Company's calculation of pro  
7       forma revenues in Adjustment 3.1, as submitted in my direct Exhibit PAC/1002. This  
8       change is explained in the reply testimony of Company witness Kenneth L. Elder Jr.  
9       A revised version of this adjustment is provided in my reply Exhibit PAC/2002. In  
10      addition to this change, the Company also identified that the paperless billing credit,  
11      approved in the Company's last general rate case (docket UE 374), was omitted from  
12      the initial calculation of pro forma revenues included in its direct filing. The updated  
13      Adjustment 3.1 now reflects this credit. For further details on the updates to pro  
14      forma revenues reflected in the Company's revenue requirement in reply, please refer  
15      to the reply testimony of Company witness Mr. Robert M. Meredith.

16      **B. TAB 4 – Operation & Maintenance (O&M) Expense**

17      **Q. What adjustments or revisions is the Company making in Tab 4, Operation &**  
18      **Maintenance Expense, for its reply filing?**

19      A. The Company has made revisions or updates to the following adjustments, discussed  
20      in more detail below in my testimony.

- 21      • Adjustment 4.2, Wage & Employee Benefits Adjustment
- 22      • Adjustment 4.3, Pension Non-Service Expense
- 23      • Adjustment 4.5, Insurance Expense

- 1 • Adjustment 4.6, Generation Overhaul Expense
- 2 • Adjustment 4.7, Revenue Sensitive Items & Uncollectible Expense
- 3 • Adjustment 4.10, O&M Expense Escalation

4 *Adjustment 4.2, Wage & Employee Benefits*

5 **Q. Please describe how the Company escalated wages and salaries for the Test**  
6 **Period.**

7 A. To arrive at Test Period level wages and salaries the Company first started with actual  
8 data from the Base Period. Union wages are escalated using contracted wage increase  
9 percentages per the collective bargaining agreements with the Company's unions.<sup>1</sup>  
10 Non-union wages are escalated using actual and anticipated average percentage  
11 increases. This resulted in an increase to O&M expense of \$5.6 million for base  
12 wages and salaries and \$1.2 million for overtime (including premium pay) on an  
13 Oregon-allocated basis in the Company's direct filing.

14 **Q. Is this methodology consistent with how the Test Period was prepared for other**  
15 **costs and expenses of the Company?**

16 A. Yes. In preparing this general rate case, the Company started with actual accounting  
17 data for the Base Period. This data was analyzed to determine if normalizing  
18 adjustments were warranted. The historical data was then adjusted to reflect known,  
19 measurable and anticipated events. In the case of wages and salaries, the Base Period  
20 data was escalated for actual, contracted and anticipated increases as described above.

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<sup>1</sup> Where union contracts have not yet been finalized for increases that would become effective within the Test Period, an estimated escalation percentage was applied. Actual increases for these unions were to be updated as more information becomes available during the pendency of this case.

1 **Q. Did any party have concerns or raise any issues associated with the methodology**  
2 **used by the Company to escalate Base Period wages and salaries to the Test**  
3 **Period level?**

4 A. No.

5 **Q. Although there were no issues or concerns raised regarding the Company's**  
6 **methodology to escalate wages and salaries, were there still proposed**  
7 **adjustments to these costs?**

8 A. Yes. Staff witness Ms. Heather Cohen recommends adjustments to labor expenses as  
9 follows:

- 10 • Wages and Salary (W&S) reduction of \$3.6 thousand in O&M expense and  
11 \$2.0 thousand in rate base
- 12 • Overtime reduction of \$644.0 thousand in O&M expense and  
13 \$350.0 thousand in rate base
- 14 • Annual incentive plan (AIP) and bonus reduction of \$1.4 million in O&M expense  
15 and \$775 thousand in rate base
- 16 • Capitalized incentives reduction of \$1.0 million in rate base; and
- 17 • As a flow-through impact of the adjustments above, small reductions for payroll taxes  
18 by \$14 thousand and depreciation expense by \$36 thousand

19 **Q. What is the basis for Ms. Cohen's proposed adjustments to wages and salaries?**

20 A. Ms. Cohen starts with the Company's actual wages and salaries data for calendar year  
21 2020. She then escalates this historical data to the Test Year using the All-Urban CPI  
22 for the U.S. Due to the complexity of the Company's multiple union contracts, she  
23 simplifies the union increases by using a weighted average based on full-time

1           equivalents (FTE) of contracted percentage increases. Ms. Cohen then applies a  
2           “sharing principle”, wherein Staff adjusts its forecasted amount to require the  
3           Company share 50 percent of the lesser of the difference between the model forecast  
4           and the amount the Company has included in its Test Year or a 10 percent band  
5           around Staff’s projections.<sup>2</sup>

6           **Q.    What is the outcome of Ms. Cohen’s analysis?**

7           A.    Based on Staff’s three-year W&S model, which analyzes W&S by categories,  
8           Ms. Cohen provides the following comparison of escalated system-wide wages and  
9           salaries based on the W&S model, and the Test Period payroll proposed by the  
10          Company in its direct filing:

11                           **TABLE 2 – Wages & Salary Projections: Staff vs. PacifiCorp Direct**

	<b>Officers</b>	<b>Exempt</b>	<b>Non-Exempt</b>	<b>Union</b>	<b>Total</b>
Staff W&S <sup>3</sup>	\$1,145,365	\$220,110,913	\$21,147,796	\$238,718,576	\$481,122,650
UE 399 Proposed	\$1,184,342	\$207,019,054	\$19,908,017	\$237,131,988	\$465,243,401
<i>Difference</i>	\$38,978	(\$13,091,859)	(\$1,239,779)	(\$1,586,588)	(\$15,870,249)

12                           As a whole, across all W&S categories, the Company’s proposed W&S levels  
13           are substantially lower than the projection estimates based on Staff’s W&S model. In  
14           total, the difference amounts to about \$15.9 million across the four categories on a  
15           system-wide basis, with the Company’s projections being lower overall.

16           **Q.    What is Staff’s recommended adjustment on Test Period wages and salaries?**

17           A.    Staff is recommending a W&S reduction to expense and rate base based on the  
18           \$39 thousand variance in the Officers W&S category where the Company’s Test  
19           Period projections was slightly higher than the projected outcomes of Staff’s W&S

<sup>2</sup> Staff/600, Cohen/5:2-6.

<sup>3</sup> “UE 399 Staff OT Exhibit 603 Cohen CONF Attach” workpaper.

1 model. There is, however, no adjustment recommended for the three other categories  
2 where the Company's Test Period projected W&S in its direct filing is substantially  
3 lower than the projections yielded by the three-year W&S model Staff produced.

4 **Q. Do you agree with Staff's recommended adjustment to wages and salaries?**

5 A. No. Staff's miniscule adjustment based on a \$39 thousand system-wide "excess" in  
6 one wage category is myopic and fails to acknowledge the bigger picture that, total  
7 system-wide W&S is \$15.9 million less in the Company's proposed Test Period  
8 expenses, than Staff's projections derived from the W&S model. To selectively  
9 propose only adjustments that reduce wages, without any corresponding adjustments  
10 or consideration for the categories where overall wages are higher is one-sided and  
11 imbalanced.

12 **Q. Do you agree with the simplification Ms. Cohen made to calculate the union**  
13 **wage increases?**

14 A. No. Ms. Cohen's methodology for calculating union wage increases did not take into  
15 account the timing of increases, nor did it take into account the varying size of each  
16 of the unions. Applying an average percentage for a calendar year to union wages  
17 was less accurate in calculating Test Year level of expenses in this category.

18 Ms. Cohen stated in her testimony that by applying this weighted-average  
19 methodology, the union salaries as escalated by Staff are within \$5 thousand of the  
20 Company's pro forma test year union wages for the nine unions.<sup>4</sup> This statement is  
21 incorrect, as the check analysis that Ms. Cohen prepared is based on amounts stated in  
22 thousands, and so the actual variance based on the application of a weighted-average

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<sup>4</sup> Staff/600, Cohen/9:4-8.



1 percentage on union wages, versus the Company's precise calculation of union wages  
2 based on contractual timing and increase percentages is in fact about \$5 million, and  
3 not \$5 thousand.

4 **Q. How is the Company's methodology for calculating wage increases more**  
5 **accurate?**

6 A. The Company starts with actual data for the Base Period and incorporated increases  
7 specific to each union group per the applicable contract. This methodology results in  
8 the correct percentage increases only being applied to the applicable wages at the  
9 appropriate time per the collective bargaining agreements. In contrast, Ms. Cohen  
10 applies a weighted-average of the contracted percentage increases and applied that  
11 average to the total union wages to arrive at the Test Period amount. While an easier  
12 calculation to make, it is less accurate in arriving at the appropriate level of union  
13 wages for the Test Period.

14 **Q. What concerns do you have with Ms. Cohen's escalation of non-union wages and**  
15 **salaries?**

16 A. As stated above, Ms. Cohen is starting with older historical data that does not match  
17 with the Base Period data used in the Company's filing. She then escalates this  
18 amount using the All-Urban CPI, rather than a wage inflator. The All-Urban CPI is a  
19 measure of inflation, the average change over time in the prices paid by consumers  
20 for goods and services.<sup>5</sup> The increase in wages and salaries should instead at least be  
21 compared to a wage index that incorporates the market conditions influencing wages  
22 and salaries.

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<sup>5</sup> *Consumer Price Index Frequently Asked Questions, Question 1*, UNITED STATES BUREAU OF LABOR STATISTICS, [https://www.bls.gov/cpi/questions-and-answers.htm#Question\\_1](https://www.bls.gov/cpi/questions-and-answers.htm#Question_1) (accessed July 15, 2022).

1 **Q. Does Staff have a proposal for overtime?**

2 A. Yes. Using the same three-year W&S model, Staff analyzed the Company's proposed  
3 Test Period overtime expense by comparing it to a corresponding escalation using  
4 Staff's W&S model. In total, Staff calculates a difference of approximately  
5 \$3.5 million in overtime, with the Company's pro forma amounts being higher. Staff  
6 recommends \$644.0 thousand reduction in expense, and \$350.0 thousand reduction to  
7 rate base on an Oregon-allocated basis related to overtime based on the W&S model  
8 analysis.

9 **Q. Does the Company agree with the proposed adjustment to Overtime?**

10 A. No. The Company notes that the overtime difference of \$3.5 million is still just about  
11 one-third of the (\$15.9 million) variance in wages calculated as the outcome of Staff's  
12 analysis of salaries using the three-year W&S model. The Company maintains that in  
13 aggregate, wages and overtime expenses projected into the Test Period are reasonable  
14 and well below the wages and overtime totals as projected by the three-year W&S  
15 model utilized by Staff.

16 Furthermore, of the \$3.5 million system-wide identified reduction to overtime,  
17 approximately \$3.3 million is attributable to union overtime. This means that the  
18 recommended reduction is disproportionately driven by union overtime, representing  
19 almost 94 percent of the total overtime expense reduction.

20 Union overtime is paid out based on negotiated union agreements and  
21 contracts. In Order 20-473, in the Company's 2021 GRC, the Commission concluded  
22 that the arms-length nature of the negotiations regarding union wages was sufficient

1 protection for customers.<sup>6</sup> Correspondingly, where the incremental overtime that  
2 Staff is recommending a reduction to is governed by negotiated union contracts, the  
3 Company maintains that its methodology relied upon to derive Test Period overtime  
4 is a more accurate, fair reflection of actual operational level of expense to be expected  
5 in the Test Period.

6 Lastly, as Ms. Cohen astutely recognized in her direct testimony, the  
7 Company's staffing levels are 3 percent lower than in the prior rate case.<sup>7</sup> The  
8 Company is experiencing an extended period of a challenging, competitive labor  
9 market in specialized electrical trade areas. This naturally leads to more overtime,  
10 especially in times of frequent natural and weather-related events that are out of the  
11 Company's control.

12 **Q. What adjustment is Staff proposing to incentives and bonuses?**

13 A. While the Company has already reduced its projected test year AIP by half, Staff  
14 argues that the projected test year expense still appears to be inflated, based on a  
15 comparison to a four-year historical average incentive amount. Staff recommends a  
16 further \$4.7 million system-wide reduction to test year AIP to bring test year AIP in  
17 line with the four-year average from 2018-2021. Further, Staff recommends a  
18 50 percent reduction to the Test Year bonuses in all categories, with an adjustment of  
19 approximately \$3.0 million on a system-wide basis. As per Staff's testimony, the  
20 incentives and bonus adjustments result in a \$1.4 million reduction to O&M expense,

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<sup>6</sup> *In the Matter of the Application of PacifiCorp d/b/a Pacific Power for a General Rate Revision*, Docket No. UE 374, Order No. 20-473 at 94 (Dec. 18, 2020).

<sup>7</sup> Staff/600, Cohen/11:7-10.

1 and \$775 thousand reduction to rate base on an Oregon-allocated basis, after  
2 capitalization, and jurisdictional allocation.

3 **Q. Was Staff’s historical average analysis on AIP performed correctly?**

4 A. Staff’s analysis on historical averages of AIP contains a couple of flaws. First,  
5 understandably due to the format the Company provided in the information in OPUC  
6 standard data request (SDR) 092, Staff’s analysis of AIP amounts is limited to the  
7 dollars recorded in the “Incentives” account. The reality is that a part of the  
8 Company’s annual AIP amounts are also recorded under the “Bonus” account. Not  
9 having considered that portion of the Company’s historical AIP that is recorded under  
10 the “Bonus” category means that the figures Staff referenced in their historical  
11 analysis are artificially low. Additionally, basing historical analysis only on the level  
12 of historical AIP dollars in past years in isolation can be misleading. The Company  
13 offers that, when reviewing AIP, the more appropriate metric would be the percentage  
14 of AIP dollars relative to total eligible wages. Correcting for the two methodological  
15 issues, the Company proposes an incremental reduction, over its direct filing, to AIP  
16 of approximately \$1.1 million, and a reduction to Bonus \$3.8 million on a  
17 system-wide basis, before capitalization.

18 **Q. Please describe in more detail how the Test Year incentives and bonus amounts**  
19 **are derived in the Company’s reply filing.**

20 A. The Company reviewed its AIP percentage relative to total eligible wages over five  
21 historical years from 2017 to 2021. Parsing out the portion of Bonus amounts that  
22 should be included as part of each year’s AIP amounts and adding it to the AIP  
23 recorded to Incentives (less Named Executive Officers (NEO) share), the Company

1 calculated the percentage of total AIP relative to exempt wages for each historical  
2 year. From there, the Company calculated the five-year historical average percentage  
3 of 14.81 percent and applied that to Test Period exempt wages to arrive at the total  
4 expected Test Year AIP (excluding officers) in 2023 of \$31.6 million on a  
5 system-wide basis. The Company then applied a 50 percent reduction to this  
6 calculated Test Period non-officer AIP, consistent with the Commission-ordered  
7 adjustment in docket UE 374, Order 20-473, to arrive at a total of \$15.8 million in  
8 Test Period AIP to be included in this case. This amount is \$1.1 million lower than  
9 the system-wide amount proposed in the Company's direct filing for AIP.

10 As for Bonuses, the Company performed a similar averaging calculation  
11 based on the recorded Bonus, reduced by the amounts that should be included as part  
12 of each year's AIP amounts, as described above. The remaining balance in this  
13 Bonus account reflects safety awards, hire-in bonuses, referral awards, training  
14 awards, and other amounts that do not fit the description of a "merit-based" incentive  
15 or bonus that would be subject to a 50 percent sharing provision. Based on a  
16 five-year average of Bonus amounts, excluding AIP, the average level of Bonus  
17 expense is approximately \$2.1 million on a system-wide basis. This amount is  
18 \$3.8 million lower than the corresponding amount included in the Company's direct  
19 filing for Bonuses.

20 **Q. Do you address Staff's proposed adjustment to capitalized officer incentives?**

21 A. Yes. This adjustment will be addressed in section Tab R, under Adjustment R\_6,  
22 Capitalized Officers' Incentives Adjustment.

1 **Q. Were there other labor-related adjustments proposed by Staff?**

2 A. Yes. Staff witness Ms. Julie Jent recommended updates to the Company's proposed  
3 dental and vision benefits expenses to bring the Test Period request down to levels  
4 more in line with national health inflation trends.<sup>8</sup> Staff argues that the Company's  
5 Test Year forecasts for vision and dental insurance are notably higher than estimates  
6 for inflation and expected increases in comparison with national trends and growth  
7 projections prepared by various health agencies and research institutes reviewed by  
8 Staff. Staff recommends projecting dental and vision insurance expenses by applying  
9 the Information Handling Services (IHS) Markit escalation index for FERC account  
10 926 (Employee Pension & Benefits), instead of setting Test Period expense forecasts  
11 based on actuarial projections.

12 **Q. How does the Company respond to Staff's proposed revisions to dental and**  
13 **vision expense?**

14 A. PacifiCorp does not agree with the reduction of the test year dental and vision  
15 expense. To switch to an escalation model using IHS Markit escalators is  
16 inconsistent with PacifiCorp's dental and vision plans, that are self-insured. The  
17 benefits trends applied in this case are calculated and provided by PacifiCorp's health  
18 and welfare consultant and actuary (Aon) and are based on actual claims paid by  
19 PacifiCorp. The dental trend as calculated by Aon for 2023 is 5.4 percent and the  
20 vision trend as calculated by Aon for 2023 is zero percent.

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<sup>8</sup> Staff/1200, Jent/17-18

1 **Q. Please summarize the revisions and updates to Adjustment 4.2, Wage and**  
2 **Employee Benefits made in the Company's reply filing?**

3 A. The Company revised Adjustment 4.2 to reflect updates to wage escalations for the  
4 latest available expected or contracted increase percentages for union and non-union  
5 wages. Furthermore, a mid-year market wage adjustment that occurred in  
6 May 2022 was also incorporated into the Test Period wage escalation calculation.

7 The Company updated AIP to reflect a five-year historical average level of  
8 exempt AIP, excluding officer incentives, reduced by 50 percent consistent with  
9 Order 20-473 in the Company's 2021 general rate case. Bonus amounts that are not  
10 merit-based are also included in the Test Period at a five-year historical average.

11 The Company also made a small update to Post Retirement Benefits to reflect  
12 the latest projections from actuarial reports. This update resulted in a reduction of  
13 approximately \$73 thousand to O&M expenses in this case.

14 Finally, the Company updated 401(k) expenses for a policy change  
15 implemented in May 2022 which is discussed in more detail below.

16 **Q. Please explain the wage and salaries changes.**

17 A. Due to the tight labor market and inflation, PacifiCorp is competing against  
18 neighboring utilities and employers that are offering starting compensation at a higher  
19 level. Accordingly, the Company made three adjustments in its reply filing  
20 regarding wages.

21 First, regarding non-union wages, the Company revised its expected annual  
22 increase percentage at the end of 2022 from 3.00 percent to 3.50 percent.

1           Second, the Company revised union wage increases to reflect latest updates to  
2           contracted wage increase percentages per the collective bargaining agreements with  
3           the Company's unions.<sup>9</sup>

4           Third, in order to attract and retain employees PacifiCorp implemented at the  
5           end of May 2022 a market pay adjustment mainly for the Portland area  
6           non-represented employees and other high-risk retention employees throughout the  
7           Company. The Company implemented this market adjustment based on time-in-job,  
8           current compa-ratio and job performance. The cost of this market pay adjustment is  
9           \$2.9 million, total-Company, on an annualized basis. The Company has incorporated  
10          this pay adjustment in its wage escalation calculation into the Test Period. The  
11          combined impact of these three revisions results in \$1.1 million increase in Test  
12          Period wages and salaries on an Oregon-allocated basis.

13   **Q.    What is the impact of the Company's revised incentives and bonuses in its reply**  
14   **filing?**

15   A.    The impact of AIP and bonus updates as described in sections above is a net decrease  
16   to expense of approximately \$900 thousand on an Oregon-allocated basis.

17   **Q.    Please explain the update to wages and 401k affected by changes implemented**  
18   **since the Company's direct filing.**

19   A.    In addition to the market pay adjustment described above, the Company enhanced its  
20   401(k) company matching percentage for non-represented employees from 65 percent  
21   on 6 percent of employee contributions to 100 percent on 6 percent of employee

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<sup>9</sup> Consistent with the Company's direct filing, where union contracts have not yet been finalized for increases that would become effective within the Test Period, an estimated escalation percentage was applied. Actual increases for these unions will to be updated as more information becomes available during the pendency of this case.



1 contributions. This policy revision is now reflected in the Company’s labor cost  
2 projections and resulted in an increase to expense of approximately \$508 thousand on  
3 an Oregon-allocated basis.

4 **Q. What is the overall impact of the updates to Adjustment 4.2 on this case?**

5 A. The overall impact of these updates and revisions, inclusive of necessary updates to  
6 payroll taxes, is a net increase of approximately \$680 thousand in  
7 Oregon-allocated expenses, which increases the revenue requirement in this case by  
8 \$711 thousand.

9 The Company notes that even with the updates in its reply filing, Test Period  
10 W&S in the Company’s projections remain well below the projected W&S levels as  
11 per Staff’s three-year W&S model in aggregate across all wage categories, by  
12 approximately \$11.1 million on a system-wide basis. This negative variance is also  
13 more than enough to offset the positive variance yielded in comparing Staff’s model  
14 and Company’s projections in the overtime category. As a whole, the Company’s  
15 projections in Test Period W&S, inclusive of overtime, continue to reflect a  
16 reasonable outcome, and is even more in-line with Staff’s total W&S projections with  
17 its reply update.

18 **TABLE 3 – Wages & Salary Projections: Staff vs. PacifiCorp Reply**

	<b>Officers</b>	<b>Exempt</b>	<b>Non-Exempt</b>	<b>Union</b>	<b>Total</b>
Staff W&S <sup>10</sup>	\$1,145,365	\$220,110,913	\$21,147,796	\$238,718,576	\$481,122,650
UE 399 Reply	\$1,212,415	\$210,896,862	\$20,154,976	\$237,772,953	\$470,037,206
<i>Difference</i>	<i>\$67,050</i>	<i>(\$9,214,051)</i>	<i>(\$992,820)</i>	<i>(\$945,623)</i>	<i>(\$11,085,443)</i>

<sup>10</sup> “UE 399 Staff OT Exhibit 603 Cohen CONF Attach” workpaper.

1 *Adjustment 4.3, Pension Non-Service Expense*

2 **Q. What changes has the Company made in Adjustment 4.3, Pension Non-Service**  
3 **Expense?**

4 A. The Company has updated pension non-service expenses to reflect projections based  
5 on the latest actuarial report from Aon. Please refer to the reply testimony of  
6 Ms. Koblaha for further discussion on pension related costs. The net impact of this  
7 updated adjustment is approximately \$1.8 million increase to revenue requirement on  
8 an Oregon-allocated basis.

9 *Adjustment 4.5, Insurance Expense*

10 **Q. Has the Company made any updates to Adjustment 4.5, Insurance Expense?**

11 A. Yes. As a result of updated allocation factors, accrual reserves have changed slightly  
12 from the amounts included in my direct testimony. The net impact of the update is a  
13 reduction of about \$4 thousand in revenue requirement.

14 **Q. Did Staff propose adjustments to the Company's Test Period non-medical**  
15 **insurance expense?**

16 A. Yes. Ms. Julie Jent outlines in her testimony three concerns she has with the  
17 Company's non-medical insurance expense. Two of the concerns are accompanied  
18 with adjustments which reduce the Company's revenue requirement request. The  
19 other concern discussed by Ms. Jent does not include an adjustment to the Company's  
20 revenue requirement request.

1 **Q. What is the first concern Ms. Jent notes with the Company’s non-medical**  
2 **insurance expense?**

3 A. Ms. Jent is concerned with the Company’s increasing property losses and suggests  
4 that it would be a more prudent business decision to “hold the line” or possibly  
5 increase the insured loss coverage with an outside insurance provider.

6 **Q. Is purchasing transmission and distribution property insurance with an outside**  
7 **provider a possibility for the Company?**

8 A. No. The Company is not able to purchase transmission and distribution property  
9 insurance in the market from a third-party insurer. This type of insurance does not  
10 exist.

11 **Q. What has the Company been doing for transmission and distribution property**  
12 **losses since insurance is not available as mentioned above?**

13 A. As mentioned in my direct testimony, when the Company’s captive insurance  
14 coverage with Berkshire Hathaway Energy Company (formerly known as  
15 MidAmerican Energy Holdings Company) expired in March 2011, the Company  
16 created a self-insurance reserve. In docket UE 217, the Company proposed  
17 establishing monthly accruals and associated reserve balances for self-insurance for  
18 transmission and distribution property losses, non-transmission and distribution  
19 property losses, and third-party liability insurance.

20 **Q. Was the self-insurance method the Company proposed for property losses**  
21 **approved in docket UE 217?**

22 A. Yes. This method was approved in Order 10-473.

1 **Q. Has the Company been using the approved self-insurance method for property**  
2 **losses?**

3 A. Yes. The Company has been using this method since 2011.

4 **Q. Please describe Ms. Jent's second concern with non-medical insurance, which is**  
5 **related to the property reserve the Company has been using since 2011?**

6 A. Ms. Jent's second concern with non-medical insurance relates to the property reserve  
7 balance that the Company has been using since 2011. This balance has accumulated  
8 to a debit position of \$20.9 million over ten years. Therefore, the Company has  
9 requested to begin amortization of this balance in the current proceeding. Ms. Jent  
10 recommends removing \$2.1 million amortization expense included in this rate case  
11 for the amortization of the property reserve balance.

12 **Q. What reasons does Ms. Jent provide for removing the \$2.1 million amortization?**

13 A. In support of her recommendation to remove the \$2.1 million from the GRC, Ms. Jent  
14 states that, "PAC failed to properly estimate uninsured loss reserves for several years  
15 and Staff does not believe the current estimate is accurate."<sup>11</sup>

16 **Q. Is the \$20.9 million debit balance in the property reserve account an "estimate",**  
17 **as Ms. Jent describes it?**

18 A. No. The \$20.9 million debit balance represents actual property damage amounts that  
19 were spent over and above the amounts that were approved to be accrued into the  
20 property reserve. This accumulated balance is not an estimate as Ms. Jent suggests,  
21 but rather, this balance reflects actual amounts spent, for which approved accrual  
22 levels from the Company's general rate cases have been insufficient to cover.

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<sup>11</sup> Staff/1200, Jent/25:7-9.

1 **Q. How has the Company developed the property accrual amounts?**

2 A. The property accrual amounts have been developed using the same method that was  
3 established back in docket UE 217. The monthly accrual is based on a 10-year  
4 average of actual property losses with each year escalated by the Consumer Price  
5 Index (CPI) to the Test Period.

6 **Q. Has the Company proposed an adjustment in this docket for approval to update  
7 the accrual amount?**

8 A. Yes. The Company has proposed to update the annual accrual amount from  
9 \$8.6 million as approved in docket UE 374 to \$10.9 million on an Oregon-allocated  
10 basis.

11 **Q. In the stipulation in docket UE 217, was any guidance provided regarding  
12 property costs in excess of the self-insured reserve balances?**

13 A. Yes. The Stipulation and order in docket UE 217 stated that, “[t]he Parties agree that  
14 PacifiCorp may file deferrals for property and liability costs in excess of the  
15 self-insured reserve balances, and that each deferral request will be evaluated  
16 individually on its merits.”<sup>12</sup>

17 **Q. Has the Company filed a deferral request for the excess property costs?**

18 A. No, the Company has not filed a deferral request. The Company is instead proposing  
19 to amortize accumulated property reserve balance over 10 years to begin lowering the  
20 balance that Oregon customers owe for property insurance expenses incurred that  
21 were not covered by the level of accrual in rates over the past 10 years.

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<sup>12</sup> *In the Matter of PacifiCorp d/b/a Pacific Power, Request for a General Rate Revision*, Docket No. UE-217, Order No. 10-473 at 6 (Dec. 14, 2010).

1 **Q. What is the reserve balance as of June 2022?**

2 A. The property reserve balance has grown from \$20.9 million at June 2021 to  
3 \$26.1 million at June 2022.

4 **Q. Are there other options that could be utilized to bring the property reserve  
5 balance down?**

6 A. Yes. One option would be to amortize the balance over a time period different than  
7 the 10 years proposed in the Company's direct filing. Another option is that the  
8 Company could change how the monthly accrual average is calculated to shorten the  
9 number of years being averaged to increase the level of on-going accruals. If the  
10 Company shortened the average to three or five years in this general rate case, instead  
11 of the 10 years currently being used, it would increase the annual accrual average and  
12 could hope to help to bring the balance down over time.

13 **Q. What is the third recommendation Ms. Jent proposes regarding non-medical  
14 insurance expense?**

15 A. Ms. Jent proposes an adjustment to include \$550 thousand for a "no claim bonus" for  
16 the Test Period.

17 **Q. Does the Company accept this adjustment?**

18 A. No, the Company does not accept this adjustment. Ms. Jent incorrectly assumes that  
19 the Company has not included a low claims bonus amount because there is no  
20 incremental adjustment incorporated in this case; however, because the low claims  
21 bonus amount was recorded in the Base Period data, and the Company has not  
22 included an incremental adjustment to remove this amount, the Company has in effect  
23 left the low claims bonus level as was recorded during the Base Period. Therefore,

1 the Company is already reflecting \$514,589 on a total-Company basis for the low  
2 claim's bonus in the Test Period. Ms. Jent's proposed adjustment would incorrectly  
3 double-count the low claims bonus.

4 **Q. Did the Company treat the low claims bonus the same in this case as the last**  
5 **general rate case, docket UE 374?**

6 A. Yes. In docket UE-374 the Company also left the low claims bonus level as what  
7 was recorded in the Base Period. In that case the low claims bonus of  
8 \$587,195 on a total-Company basis was higher than the \$550,000, total-Company,  
9 test year projection. In both cases, the Company did not adjust low claims bonus  
10 amount to reflect projections, as these amounts can vary.

11 **Q. Have other parties raised issues with regards to injuries and damages liability?**

12 A. Yes. AWEC proposes to remove a portion of liability insurance premiums, as AWEC  
13 suggests that California wildfire premiums were a source of the increase in liability  
14 insurance. AWEC asserts that requiring Oregon customers to pay for the cost of  
15 these policies is not reasonable, as they do not benefit from these policies.

16 **Q. Does the Company accept this adjustment?**

17 A. No. The Company does not accept this adjustment. In its surrebuttal testimony in the  
18 last GRC (docket UE 374), Company witness Ms. Shelley E. McCoy addressed the  
19 costs of insurance premiums related to California wildfires in her surrebuttal  
20 testimony, explaining that, "[t]he increase is due to the Company's loss history...and  
21 the California wildfire exposure. One of the insurers believes they have not funded  
22 the California wildfire exposure adequately over the years and is looking for a  
23 minimum amount to continue offering it. These policies cover claims in any state,

1 including for wildfires started in California, and are allocated to all states as the  
2 policies cover system-allocated assets.”<sup>13</sup> The allocation methodology of this policy is  
3 consistent with other liability insurance policies.

4 **Q. Were the California wildfire policies approved for inclusion in the last general  
5 rate case, docket UE 374?**

6 A. Yes. The Company’s insurance premiums in docket UE 374, which included  
7 California wildfire policies, were approved for inclusion in Order 20-473.  
8 Specifically, in the order the Commission acknowledged the Company’s explanation  
9 of premium increases being driven by California wildfire exposure, and states further  
10 that, “We note the cost of the Delta Fire damaged facilities is also system-allocated,  
11 illustrating the impact of California wildfire risk on Oregon customers. We find that  
12 PacifiCorp has demonstrated that its proposed level of expense for insurance is  
13 reasonable...”<sup>14</sup>

14 ***Adjustment 4.6, Generation Overhaul Expense***

15 **Q. What changes has the Company made in Adjustment 4.6, Generation Overhaul  
16 Expense?**

17 A. This adjustment was updated to reflect the latest version of IHS Markit escalators  
18 published in May 2022.

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<sup>13</sup>*In the Matter of PacifiCorp d/b/a Pacific Power, Request for a General Rate Revision, Docket No. UE 374, Exhibit PAC/4400, McCoy/36:13-17 (Aug. 14, 2020).*

<sup>14</sup> Order No. 20-473 at 108.



1 *Adjustment 4.7, Revenue-Sensitive Items & Uncollectibles*

2 **Q. Were changes to revenue-sensitive items proposed by Parties in this case?**

3 A. Yes. As noted in my direct testimony, the Company submitted its direct filing with  
4 an outdated OPUC fee percentage, as the latest update was released too close to the  
5 Company's required filing date for the update to be made. As stated in my direct  
6 testimony, and recommended by Staff witness Mr. John L. Fox, the Company has  
7 updated the OPUC fee to reflect in its revenue requirement calculation the latest  
8 approved fee percentage of 0.43 percent, as approved by Commission Order  
9 22-062, issued February 24, 2022.

10 **Q. Were there other adjustments proposed to revenue-sensitive items and**  
11 **uncollectible expenses in this case?**

12 A. Yes. Staff witness Mr. Brian Fjeldheim states that PacifiCorp's uncollectible rate of  
13 0.500 percent in this case is significantly higher when compared to historical data and  
14 other regulated Oregon utilities. Staff recommends PacifiCorp use the uncollectible  
15 rate of 0.336 percent established in the Company's previous rate case  
16 (docket UE 374) that predates the onset of COVID-19. Staff further asserts that  
17 Staff's recommendation is based upon PacifiCorp's implementation of a temporary  
18 arrearage management plan (AMP) for COVID-19 in the Base Year that is anticipated  
19 to ramp down in the Test Year. Accordingly, Staff's recommendation follows similar  
20 outcomes of NW Natural's most recent rate case (docket UG 435), where NW  
21 Natural agreed to continue applying the uncollectible account factor from their prior  
22 rate case (docket UG 388), thereby excluding the impact of a once in a century global  
23 pandemic on uncollectible account data in the Test Year.

1 **Q. Does the Company agree with Staff’s recommendation?**

2 A. No. Uncollectible rates are unique to each individual utility based on a myriad of  
 3 circumstances. While it may be reasonable for NW Natural to use its uncollectible  
 4 factor from its prior general rate case as a proxy for calculating uncollectible expense  
 5 absent COVID-19 impacts, the same is not true for PacifiCorp. The Company  
 6 analyzed uncollectible expenses deferred in the base period and based on  
 7 uncollectible expenses and general business revenues as filed in the Company’s direct  
 8 filing, if these COVID-19 related amounts were normalized out of test year  
 9 uncollectible expense, the Company’s uncollectible rate in this case would only  
 10 decrease slightly from 0.500 percent to 0.455 percent. Furthermore, reviewing the  
 11 Company’s three most recent previous general rate cases, the Company’s approved  
 12 uncollectible rates were as follows:

13 **TABLE 4 – PacifiCorp Approved Uncollectible Rates**

Docket UE 217 (2011 GRC)	Docket UE 246 (2013 GRC)	Docket UE 263 (2014 GRC)
0.618%	0.493%	0.525%

14 As demonstrated in Table 4 above, the Company’s historical uncollectible rate has  
 15 trended closely at around 0.500 percent. The uncollectible rate approved in  
 16 UE 374 was anomalously low, as the base period of that general rate case was  
 17 12 months ended June 2019, and the overall economy was strong. Therefore,  
 18 reverting the Company’s uncollectible expense in this case to 0.336 percent as  
 19 approved in the last case is an unreasonable recommendation, as it results in an

1 uncollectible rate that significantly deviates from the Company's demonstrated  
2 uncollectible rate over the past decade.

3 ***Adjustment 4.10, O&M Expense Escalation***

4 **Q. Has the Company updated the escalation factors used to escalate non-labor costs**  
5 **from the Base Period to the Test Period in this case?**

6 A. Yes. When the Company prepared this general rate case, it used the most current  
7 escalation factors from IHS Markit (formerly IHS Global Insights), which were from  
8 January 2022. These industry-specific inflation factors resulted in an increase to  
9 Oregon-allocated O&M expenses (FERC Accounts 500 – 935, excluding net power  
10 costs included in the Company's TAM) of \$8.0 million. In this reply filing the  
11 Company has updated the escalation factors to IHS Markit's First Quarter 2022  
12 Forecast issued in April 2022. This update increases the escalation to  
13 Oregon-allocated O&M expense by \$2.7 million, which is in alignment with Staff's  
14 recommend escalation adjustment using the All-Urban CPI (CPI-U), which would  
15 have increased Oregon-allocated O&M by \$2.8 million on an Oregon-allocated  
16 basis.<sup>15</sup>

17 **Q. The Company has used escalation factors from IHS Markit. Has Staff**  
18 **recommended the use of a different escalation factor?**

19 A. Yes. Staff recommends using the CPI-U from the State of Oregon Office of  
20 Economic Analysis June 2022 report, a generic measure of inflation.

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<sup>15</sup> Staff/200, Fox/34:14-15.

1 **Q. Does the Company agree with the usage of CPI-U for non-labor cost escalation**  
2 **over IHS Markit indices?**

3 A. Despite Staff's recommendation to use CPI-U for non-labor escalation yielding a  
4 higher Test Period O&M amount adjustment, the Company continues to maintain that  
5 IHS Markit escalation indices are superior and more appropriate escalation factors for  
6 non-labor expense escalation purposes in this case.

7 **Q. How are the escalation factors from IHS Markit more appropriate than the**  
8 **All-Urban CPI recommended by Staff?**

9 A. First and foremost, non-labor O&M escalation by use of IHS Markit escalation  
10 indices was approved in the Company's last GRC in Order 20-473. Where the  
11 All-Urban CPI is one generic inflation factor, the escalation percentages provided by  
12 IHS Markit are industry specific. In its order in the Company's last GRC, the  
13 Commission stated that Staff did not address why use of All-Urban CPI index was  
14 more appropriate than these industry-specific indices. Accordingly, the Commission  
15 declined to adopt Staff's recommendation.<sup>16</sup>

16 **Q. Has Staff provided further evidence supporting the use of CPI-U indices?**

17 A. Staff argues that CPI rates are more transparent and have a long history. CPI-U is a  
18 publicly available source that can be verified, but proprietary sources such as IHS  
19 Markit indices cannot be analyzed and directly compared to the components of the  
20 widely used CPI rate. Secondly, Staff supports having consistency across the six  
21 investor-owned utilities regarding escalation.

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<sup>16</sup> *In the Matter of PacifiCorp, d/b/a Pacific Power, Request for a General Rate Revision*, Docket No. UE 374, Order No. 20-473 at 111 (Dec. 13, 2020).

1 **Q. How does the Company respond?**

2 A. Public accessibility and comparability does not necessitate greater accuracy and  
3 appropriateness. The IHS Markit indices are developed based on detailed information  
4 contained in FERC's Uniform System of Accounts for major electric utilities. IHS  
5 Markit forecasts electric utility O&M cost indices at the FERC Account level. This  
6 level of detail allows electric utilities to escalate very specific costs by appropriate  
7 measures. These forecasts are based on a uniform set of assumptions about how the  
8 U.S. economy will perform and therefore reflects common industry  
9 inter-relationships. The level of detail provided and industry-specific analysis  
10 incorporated in the IHS Markit indices result in more encompassing escalation factors  
11 versus a single generic inflation factor. The Company continues to view these  
12 industry-specific factors as the superior escalation forecast for a utility, which is a  
13 specialized industry.

14 ***Other Proposed O&M Adjustments***

15 **Q. Has any party proposed adjustments to meals & entertainment expenses?**

16 A. Yes. Staff witness Mr. Paul Rossow is proposing an incremental adjustment for  
17 meals and entertainment. Staff's proposed adjustment of \$25,728 is taken directly  
18 from the Company's December 2021 Results of Operations (ROO) report filed in  
19 April 2022, as provided in the Company's response to OPUC data request 390. This  
20 adjustment from the December 2021 ROO represents the calculated adjustment to  
21 meals and entertainment based on the reporting period of 12 months ended December  
22 2021. From there, Mr. Rossow escalates this adjustment using the All-Urban CPI

1 index to arrive at a total reduction of \$28,191 to meals and entertainment expenses on  
2 an Oregon-allocated basis.

3 **Q. Does the Company agree with Mr. Rossow's proposed adjustment?**

4 A. No. To understand why, it is necessary to understand how the Company's meal and  
5 entertainment adjustments are derived. For each reporting period, the Company  
6 performs an audit on base year recorded expense for meals and entertainment. This  
7 audit examines the amounts recorded to the meals and entertainment account to  
8 address whether each expense item recorded is subject to the 50 percent disallowance  
9 as per Order 20-473 in the Company's 2021 GRC. Each reporting period then results  
10 in an adjustment uniquely matched to the data recorded in that specific reporting  
11 period. By superimposing an adjustment from the Company's December 2021 ROO,  
12 which was prepared using base period data for the 12 months ended December 2021,  
13 Mr. Rossow's adjustment creates a duplicative adjustment of the disallowed items  
14 incurred in the months of January 2021 – June 2021 and seeks to remove costs from  
15 July 2021 – December 2021 that is not included in the Base Period data in this case.

16 **Q. Did the Company already include an adjustment for meals and entertainment  
17 expenses to reflect a 50 percent disallowance as per the previous GRC order?**

18 A. Yes. As stated in Mr. Rossow's testimony, PacifiCorp has already included an  
19 adjustment for these O&M non-labor expenses and removes 50 percent of these costs  
20 from each expense category resulting in a total-Company removal of \$61,751, and an  
21 Oregon-allocated removal of \$20,671.<sup>17</sup> This adjustment is included in my direct

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<sup>17</sup> Staff/1500, Rossow/8:15-18.

1 testimony, in Exhibit PAC/1002, Cheung/107-108, Adjustment 4.9 – Meals and  
2 Entertainment Adjustment.

3 **Q. What is the Company’s response to Mr. Rossow’s proposal on meals and**  
4 **entertainment?**

5 A. The Company recommends that the Commission reject Mr. Rossow’s proposal to  
6 further reduce test year meals and entertainment expense in this case by an additional  
7 \$28,191, as it is duplicative and simultaneously attempts to remove other costs that  
8 are not reflected in the Company’s Base Period results used in this case.

9 Mr. Rossow’s attempt to apply an adjustment derived based on expense data from the  
10 12 months ended December 2021 on top of the Test Period results in this case is  
11 misaligned and inappropriate.

12 **Q. Did Mr. Rossow recommend any other adjustments to non-labor O&M**  
13 **expenses?**

14 A. Yes. Mr. Rossow has also recommended a reduction to memberships and  
15 subscriptions in the amount of \$185,528 on an Oregon-allocated basis.

16 **Q. How was the proposed adjustment derived?**

17 A. Mr. Rossow appears to have relied again upon the Company’s response to OPUC data  
18 request 391, wherein the adjustment to memberships and subscriptions from the  
19 Company’s December 2021 ROO filing was provided. He took the net adjustment of  
20 \$169,313, on an Oregon-allocated basis, which removed expenses in excess of  
21 Commission policy allowances as stated in the Commission order in docket UE-94,  
22 for the reporting period 12 months ended December 2021, and applied the CPI-U

1 index to arrive at an escalated adjustment of \$185,528 to be removed from Test  
2 Period O&M expenses in this case.

3 **Q. Do you agree with Mr. Rossow's adjustment?**

4 A. No. Similar to the methodology by which meals and entertainment adjustments are  
5 calculated, memberships and subscriptions adjustments are derived in the exact same  
6 manner, where each reporting period's adjustment is uniquely calculated based on a  
7 review of the corresponding actual expenses recorded in that specific base period.  
8 Again, Mr. Rossow is proposing to superimpose an incremental adjustment that  
9 results in duplicate removal of disallowances from January 2021 – June 2021, and  
10 also seeks to remove expenses from July 2021 – December 2021 that is not part of the  
11 Base Period data on which this rate case was built upon.

12 **Q. Has the Company already reflected an appropriate adjustment for memberships  
13 and subscription disallowances that matches the removal of expense to the Base  
14 Period data included in this case?**

15 A. Yes. An adjustment for this expense item is included in my direct testimony,  
16 Exhibit PAC/1002, Cheung/104-106, Adjustment 4.8 – Memberships and  
17 Subscriptions.

18 **Q. Please describe Staff's adjustment to Customer Accounts expenses.**

19 A. Staff witness Mr. Fjeldheim recommends a \$3.3 million reduction to the Customer  
20 Accounts expense (FERC Accounts 901-905, excluding FERC Account 904) based on  
21 data provided in response to Staff SDR 057 and 058.

22 **Q. How did Mr. Fjeldheim project the Test Period reduction in these accounts?**

23 A. Mr. Fjeldheim compared FERC account 901-903 & 905 balances on an



1 Oregon-allocated basis for non-labor totals, provided in SDR 057 of \$1.3 million and  
2 SDR 058 of \$5.9 million. He then applies what he refers to as a “proxy factor” to the  
3 amounts listed in SDR 058-2 of -4.5 percent, -46.3 percent and -86.7 percent to  
4 balances in FERC accounts 901-903 & 905 to pro-rate down the Test Period balance  
5 as reported in SDR 058 to match SDR 057 subtotal of \$1.3 million. Mr. Fjeldheim  
6 then applied a CPI-U escalation factor to the pro-rated down balances to determine  
7 his recommendation for the appropriate level of customer accounts expense in the  
8 Test Period, and then calculated the required adjustment from the Company’s  
9 proposed level of expenses to result at Staff’s proposed Test Period expense levels.

10 **Q. Did you review Mr. Fjeldheims’ comparison of the Customer Accounts expenses**  
11 **data provided in SDR 057 and 058?**

12 A. Yes. In reviewing Mr. Fjeldheim’s comparison of these accounts a discrepancy was  
13 discovered in the data provided in SDR 057 for FERC account 903. While the  
14 Company has made a good faith effort to provide all of the non-labor accounting data  
15 for the Base Period in SDR 057, some accounts for contractor labor were mistakenly  
16 left out of the response. One account in particular in the FERC account 903 base  
17 period expense totaled \$3.4 million on an Oregon-allocated basis, explaining the large  
18 difference that Mr. Fjeldheim noted. The Company is preparing a revised response to  
19 SDR 057 to include these missing accounts and will submit it shortly.

20 **Q. With this correction, will the data provided in SDR 057 match the non-labor**  
21 **amounts provided in SDR 058(b)?**

22 A. No. As the Company explained in response to OPUC data request 534, test year  
23 amounts in PacifiCorp’s GRC are prepared at the FERC account level on a

1 total-Company basis and do not include a detailed break-down between labor and  
2 non-labor expenses. The exceptions are specific adjustments prepared to escalate  
3 labor costs from the base year, Adjustment 4.2 (Wages and Employee Benefits  
4 Adjustment), and Adjustment 4.3 (Pension Related Non-Service Expense). The  
5 Wages and Employee Benefits Adjustment is then spread across FERC accounts  
6 utilizing the “Distribution of Salaries and Wages” page from the Company’s FERC  
7 Form 1.

8 To prepare the Test Year portion of SDR 058(b), the test year amounts from  
9 these two labor adjustments are removed from total test year FERC account balances  
10 to provide the requested non-labor amounts. For better comparability between the  
11 test year and the historical periods included with the Company’s response to SDR  
12 058(b), the Company prepared the historical period amounts in a similar manner  
13 utilizing these same adjustments from the corresponding Oregon’s ROO filing from  
14 previous years.

15 This split between labor and non-labor in preparation of the response to SDR  
16 58(b) is also consistent with how amounts are escalated from the Base Period to the  
17 test year in PacifiCorp’s rate case. The labor amounts included in the two labor  
18 adjustments are escalated specific to union contracts, actual and expected salary  
19 increases, actuarial projections, etc. These labor amounts are then removed from the  
20 total O&M accounts and the net expense is escalated using the IHS Markit indices as  
21 described in Adjustment 4.10 above, ensuring the costs are not duplicated in the  
22 escalation of O&M from the Base Period to the Test Year.

1           The Company’s response to SDR 057 reflects transaction level detail as  
2 recorded in the Company’s accounting records based on general ledger (G/L) account  
3 detail. Because the Wages and Employee Benefits Adjustment is an approximate  
4 distribution of labor costs across FERC accounts, the amounts provided in SDR 058  
5 for the base period will not match exactly for any FERC account that includes labor  
6 costs.

7 **Q. Did Mr. Fjeldheim propose any other adjustments based on O&M expenses?**

8 A. Staff is proposing a reduction to test year rate base of \$2.9 million, under the  
9 assumption that these amounts represent legal expense that has been capitalized.

10 **Q. What is Staff basing their assumption on that the amounts proposed to be  
11 removed are capitalized legal expenses?**

12 A. The Company provided a transactional listing of legal expenses in response to OPUC  
13 data request 349. Staff is broadly assuming that 440 transactions line items without a  
14 description in the “Text” field, showing a negative dollar amount, represent instances  
15 where the Company transfers operating expenses associated with capital projects  
16 from an operating expense FERC account to capital or plant FERC account. Staff  
17 cites the Company’s response to OPUC data request 339 subpart c as support for this  
18 argument. Fundamentally, it appears Staff’s recommendation to remove \$2.9 million  
19 from Test Year rate base is rooted in the alleged lack of supporting information and  
20 transactional details on these transaction line items.

1 **Q. Do negative amounts, or credits, recorded in expense accounts necessarily**  
2 **represent capitalized amounts?**

3 A. No. In the Company's response to OPUC data request 515, the Company explained  
4 that negative amounts found in expense accounts can be due to a variety of reasons,  
5 including manual adjustments; settlements to cost objects, order, cost centers or  
6 capital projects; reversals of accruals; or clearing entries. Mr. Fjeldheim's reference  
7 to OPUC data request 339 subpart c is an inappropriate reference. The context of that  
8 question specifically inquiries about data contained in Excel file "Attach OPUC  
9 057 FERC 903", asking for explanations of why "OR" and "CN" entries net to a  
10 negative total. The response in subpart c provided by the Company is applicable only  
11 in this limited context and should not be interpreted as a blanket statement applicable  
12 to all expenses. In fact, there are no line items in the 440 lines of transaction records  
13 challenged by Mr. Fjeldheim that is recorded to FERC account 903.

14 **Q. Staff claims that the referenced negative amounts lack supporting information**  
15 **and transactional details. Do you agree?**

16 A. No. While the specific negative entries in question do not show any descriptions in  
17 the "Text" field, as often these types of system generated settlement entries do not,  
18 there is a corresponding debit entry for the same transaction that most often will  
19 reflect a description of the order, or cost object that the amounts are being moved to.  
20 I have prepared a confidential workpaper "Attach OPUC 349 – Legal Expense  
21 Support CONF.xlsx" that will be submitted in conjunction with my reply testimony.  
22 In the tab labelled "OPUC 349 CONF", the Company has provided the complete  
23 listing of offsetting debit entries corresponding to the 440 lines of credit amounts

1 Staff identified in its opening testimony. As can be seen on this tab, each debit line  
2 item indicates in the “Text” field an order or work breakdown structure (WBS)  
3 element that can be further investigated to verify the nature of the expense and the  
4 projects or work orders to which these amounts are being transferred. Accordingly,  
5 Mr. Fjeldheim’s assertion that these line items lack support or details is not true.  
6 System generated reports are not perfect, in that not every field will produce all the  
7 information that is available, but there are enough elements in the report to enable  
8 further investigations and inquiries be made in order to verify the costs in question.

9 **Q. Is the adjustment based on Staff’s reasoning calculated correctly?**

10 A. No. The \$2.9 million of credits identified by Mr. Fjeldheim in OPUC data request  
11 349 is reported on a total-Company basis. This makes Staff’s proposed adjustment  
12 artificially inflated as it is not reflecting a jurisdictional allocation impact in the  
13 calculation of is proposed adjustment.

14 In reviewing Mr. Fjeldheim’s analysis of OPUC data request 349, however,  
15 the Company noticed that the response and attachment provided reflected data for the  
16 12 months ended June 2020, which is the incorrect base period. The Company  
17 apologizes for the error and has immediately prepared a revised response to OPUC  
18 data request 349 that was submitted on July 15, 2022, to provide the corresponding  
19 data requested for the 12 months ended June 2021.

20 **Q. Does the revised attachment for OPUC data request 349 change the Company’s**  
21 **stance on the proposed rate base removal presented by Staff?**

22 A. No. The Company’s objection to Staff’s proposed adjustment still stands. To help  
23 facilitate Staff’s review of the revised response, in the confidential attachment I have

1 provided with my reply testimony, “Attach OPUC 349 – Legal Expense Support  
2 CONF.xlsx”, a tab is included labelled “OPUC 349 1<sup>st</sup> Revised CONF” which applies  
3 the same logic and methodology Mr. Fjeldheim exercised in his direct analysis of the  
4 original response. The outcome of that analysis, based on the correct period’s data,  
5 results in line items with negative amounts of 359 rows. Amounts on this tab are also  
6 provided with the appropriate Oregon allocations.

7 **C. TAB 5 – Net Power Costs**

8 **Q. What revisions are included in Tab 5, Net Power Costs?**

9 A. The Company has updated net power costs to the level included in its TAM reply  
10 filing for purposes of showing the price changes related to both the TAM and GRC  
11 and for calculating the level of revenue sensitive items such as franchise taxes and  
12 bad debt expense.

13 **D. TAB 6 – Depreciation & Amortization**

14 **Q. What adjustments or revisions is the Company making in Tab 6, Depreciation &  
15 Amortization Adjustments, for its reply filing?**

16 A. The Company has made no revisions or updates to the adjustments in Tab 6.

17 **Q. Has any party proposed changes or updates to depreciation expense in this case?**

18 A. Yes. Staff has proposed updates to negative net salvage percentages for specific coal  
19 plants. AWEC has proposed adjustments to remove depreciation expenses associated  
20 with two rate base items not included in the calculation of revenue requirement in this  
21 case. AWEC has also proposed updates to the Company’s request to update the  
22 depreciable lives for specific coal-fired units in this case. I will discuss and address  
23 each party’s proposal in more detail below.

1 **Q. Please describe Staff's proposal to update negative net salvage percentages.**

2 A. Staff proposes an adjustment to the net salvage percent of specific coal plants that  
3 allegedly results in an estimated reduction to the net salvage value by \$7.95 million.  
4 This proposal is focused on the coal plants whose service lives have been extended.<sup>18</sup>  
5 Staff claims that this proposal would reduce the depreciation rate for coal assets from  
6 6.87 percent to 6.81 percent, which would equate to a decrease in total-company  
7 depreciation expense of approximately \$4.1 million, and \$1.1 million on an  
8 Oregon-allocated basis.

9 **Q. Does the Company agree with Staff's proposal to adjust negative net salvage**  
10 **percentages for coal-fired plants?**

11 A. No. Negative net salvage is a component of a depreciation rate that is re-assessed as  
12 a part of every depreciation study. It determines what needs to be accrued through  
13 the depreciation rate in excess of an asset's remaining net book value for any removal  
14 cost net of salvage. It considers not only the cost of removal, net of salvage, for final  
15 decommissioning of a facility, but also the interim cost of removal, net of salvage,  
16 over its remaining operational life. The calculation of this interim amount is highly  
17 complex and involves a combination of actuarial analysis of the Company's historical  
18 data, the application of updated Iowa Curves to project future interim removal spend,  
19 and informed judgement based on the interpretation of statistical and utility industry  
20 trends. This process requires the services of a depreciation consultant that the  
21 Company would have to hire to accurately quantify any adjustments made to existing  
22 negative net salvage percentages. Since coal plant depreciation rates and their

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<sup>18</sup> Staff/1400, Peng/4:22-23.

1 associated depreciation parameters (which included negative net salvage) were  
2 recently approved in docket UE 374, the Company feels it would not be appropriate  
3 to attempt an approximated update to these parameters in this proceeding, but rather  
4 wait until its next depreciation study to revisit and recalibrate negative net salvage  
5 percentages.

6 Staff's testimony also states that proposals to adjust negative net salvage  
7 percentages were focused on coal plants for which depreciable lives have been  
8 extended since last approved, in docket UE 374. However, the Company notes that  
9 Dave Johnston and Naughton plants, included in Ms. Ming Peng's analysis, are not in  
10 fact part of the Company's proposal for coal life updates in this case. Colstrip, while  
11 part of the depreciable life update in this case, its life is being proposed to be  
12 shortened by 2 years, from 2027 to 2025, and is not being extended. Staff did not  
13 produce calculations in support of the three units for which depreciable lives are  
14 being proposed to be extended in this case, Craig Unit 2 (and Common facilities), and  
15 Hayden Units 1 & 2. However, as stated in Ms. Peng's testimony, "[w]hen a coal  
16 power plant is close to the end of its life, the asset would be close to being fully  
17 depreciated. At this stage, extending the service life will increase net salvage cost,  
18 and therefore resulting in a depreciation expense increase," and not decrease it as  
19 Ms. Peng's calculation suggests.

20 **Q. Do you have any speculations as to why units at Dave Johnston and Naughton**  
21 **plants are included in Staff's proposal?**

22 A. It is plausible that Staff may have been referencing the proposed end of depreciable  
23 life for these units from the Company's direct filing in docket UM 1968, which does



1 show dates that differ from those ultimately approved in docket UE 374.

2 Nonetheless, the depreciable lives of these units have not been proposed to change  
3 since approved in docket UE 374 and should not be included in Staff's calculation for  
4 updates to negative net salvage in its proposal, which, as stated in Ms. Peng's  
5 testimony is "focused on the coal plants whose services lives have been extended."<sup>19</sup>

6 **Q. Are the calculations presented by Staff in support of their adjustment to  
7 negative net salvage percentages for coal-fired plants appropriate?**

8 A. No. The calculations for the proposed adjustments to Colstrip is significantly flawed.  
9 First, Staff's workpaper compares the current retirement date and negative net salvage  
10 percentages for Colstrip, to the retirement date and negative net salvage percentages  
11 associated with Cholla Unit 4 from the Company's original filing submitted in  
12 docket UM 1968. Retirement dates and negative net salvage percentages are plant  
13 specific and should not be applied to other plants. Second, not only is it inappropriate  
14 to apply Cholla's negative net salvage percentages to Colstrip, but no effort appears  
15 to have been made to justify the derivation of this proposed reduction to Colstrip's  
16 negative net salvage percentages through the different types of analyses previously  
17 described. Third, in calculating the new annual accrual based on the proposed  
18 reductions to negative net salvage, Staff incorrectly reduces future accruals by the  
19 entirety of the proposed negative net salvage percentage, rather than just the  
20 decremental change, from the current value to the proposed value resulting in an  
21 overstatement of the impact to depreciation expense. Finally, not only are similar data  
22 integrity and formulaic mishaps also present throughout Staff's proposed adjustments

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<sup>19</sup> Staff/1400, Peng/4:22-23.

1 for Dave Johnston and Naughton, as stated above, these units should not even have  
2 been considered for this analysis since the Company did not propose making any  
3 changes to their lives as part of this case. And as stated above, no calculations for the  
4 units that are included in the Company's proposal for depreciable life extension have  
5 been provided by Staff.

6 **Q. Correcting for the flaws discussed above, what would the impact of Staff's**  
7 **recommendation to update negative net salvage be?**

8 A. Removing the impact calculated on Dave Johnston and Naughton, Staff's calculated  
9 impact would be reduced to a decrease of \$1.6 million to annual depreciation expense  
10 on a total-company basis. Further, correcting the references to Cholla Unit 4 that has  
11 been incorrectly applied in Staff's analysis to properly reflect those of Colstrip's, and  
12 correcting for the artificial inflation of the estimated impact due to the mathematical  
13 calculation issue described above, an approximate decrease of \$4,300 is the result of  
14 Staff's proposal to adjust net salvage percentages on Colstrip. This impact when  
15 spread over Colstrip's remaining life, results in a change to annual depreciation that is  
16 so small it is immeasurable, or \$0 for all practical purposes.

17 **Q. What updates has AWEC proposed regarding the Company's request to update**  
18 **coal depreciable lives?**

19 A. AWEC witness Dr. Lance Kaufman recommends for the depreciable life of Colstrip  
20 to be left as is, to end in 2027, and is supportive of the Company's proposed  
21 extension of depreciable lives for Craig Unit 2 (and common facilities), and Hayden  
22 Units 1 and 2. In addition, Dr. Kaufman proposes extending the depreciable lives of  
23 Jim Bridger Units 1 and 2. The Company notes that Dr. Kaufman's testimony

1 recommends Jim Bridger Units' depreciable lives be extended to 2038 to match the  
2 planned operational end of life in the Company's 2021 Integrated Resource Plan  
3 (IRP) Update, but the reference to IRP page cited in his testimony states that the  
4 planned operational lives for these units is through 2037. Please refer to the reply  
5 testimony of Ms. Steward for further discussion on the Company's response to  
6 Dr. Kaufman's proposals on this issue.

7 **Q. Please describe the other adjustments relating to depreciation expense presented**  
8 **by AWEC?**

9 A. AWEC recommends adjusting depreciation expense related Rolling Hills and Labor  
10 Day fires restoration projects. Dr. Kaufman asserts that the Company does not appear  
11 to have a matching depreciation adjustment to remove depreciation expense for these  
12 rate base items reflected in the rate case. For this reason, Dr. Kaufman is of the  
13 opinion that the depreciation expense has been left in Test Period results.

14 **Q. Did AWEC issue any data requests verifying or confirming whether Rolling**  
15 **Hills and Labor Day fires restoration projects depreciation expense is included**  
16 **or excluded from test period results?**

17 A. No.

18 **Q. Do you agree with Dr. Kaufman's assessment?**

19 A. No. The Company's adjustment to calculate Test Period depreciation expense,  
20 namely Adjustment 6.1, fundamentally begins the calculation by establishing the test  
21 period capital rate base balance, considering the rate base capital projects that are to  
22 be excluded from test period results. The Company then applies the composite  
23 depreciation rate on this adjusted rate base balance to derive a corresponding

1 depreciation expense that aligns with the forecasted capital rate base balance.  
 2 Adjustment 6.1 then takes the difference of the calculated Test Period depreciation  
 3 expense and the Base Period depreciation expense as the adjustment required to arrive  
 4 at the correct Test Period depreciation expense. This calculation, and the rate base  
 5 balance on which Test Period depreciation expense is calculated can be verified in the  
 6 electronic workpapers provided with the Company’s direct testimony filing.<sup>20</sup>

7 **Q. Can you demonstrate this with an example?**

8 A. Yes. Please refer to the calculations below demonstrating the functionality of the  
 9 Company’s Adjustment 6.1 workpaper, in simplified terms:

10 Project X – included as part of Test Period Capital Rate Base

A	B	C	D	E	F	G
Base Period Depreciation Expense	Total Capital Rate Base	Project X Rate Base (embedded in B)	Adjusted Rate Base for Test Period Depreciation Expense Calculation	Test Year Composite Rate	Test Period Depreciation Expense	Depreciation Expense Adj.
1,000,000	20,000,000	2,000,000	20,000,000	5.50%	1,100,000	100,000
			= B		= D x E	= F - A
Test Period Depreciation Expense Summary:						
20,000,000 x 5.50% = 1,100,000 (See F above)						

<sup>20</sup> Non-confidential workpapers submitted by Sherona L. Cheung, “Adj. 6.1, 6.2, Retirement & RB Templates” folder.

1 Project Y – excluded as part of Test Period Capital Rate Base

A	B	C	D	E	F	G
Base Period Depreciation Expense	Total Capital Rate Base	Project Y Rate Base (embedded in B)	Adjusted Rate Base for Test Period Depreciation Expense Calculation	Test Year Composite Rate	Test Period Depreciation Expense	Depreciation Expense Adj.
1,000,000	20,000,000	2,000,000	18,000,000	5.50%	990,000	(10,000)
			= B - C		= D x E	= F - A
Test Period Depreciation Expense Summary: 20,000,000 x 5.50% = 1,100,000 (2,000,000) x 5.50% = (110,000) 18,000,000 990,000 (See F above)						

2 As demonstrated above, the Company’s Adjustment 6.1 appropriately imputes  
 3 a reduction to test year depreciation expense that reverses out the depreciation  
 4 expense associated with rate base projects that have been removed from the rate base  
 5 in the test year. Accordingly, to layer on top of the test period depreciation expense  
 6 adjustment developed in Adjustment 6.1, an adjustment to remove depreciation  
 7 expense associated with the excluded rate base would result in a double-removal of  
 8 these amounts in the Test Period.

9 **E. TAB 7 – Tax**

10 **Q. What adjustments or revisions is the Company making in Tab 7, Tax**  
 11 **Adjustments, for its reply filing?**

12 A. The Company has made revisions or updates to the following adjustments, discussed  
 13 in more detail below in my testimony.

- 14 • Adjustment 7.6, Wyoming Wind Generation Tax
- 15 • Adjustment 7.9, Oregon Corporate Activity Tax (OCAT) & Metro Supportive
- 16 Housing Services (SHS) Tax Adjustment

1           Additionally, as part of the revenue requirement calculation, PacifiCorp's model  
2           automatically recalibrates interest expense on a pro forma basis with each change to  
3           pro forma rate base. Therefore, as a result of the rate base revisions and updates  
4           included in this reply filing, Adjustment 7.1, Interest True-Up, has also been  
5           recalculated to reflect the appropriate level for the Test Period.

6           ***Adjustment 7.6, Wyoming Wind Generation Tax***

7           **Q.     What update has been made to Adjustment 7.6, Wyoming Wind Generation**  
8           **Tax?**

9           A.     This adjustment has been updated to include a phased calculation for the Wyoming  
10          Wind Generation Tax for Ekola Flats and TB Flats based on the staggered in-service  
11          dates for the various turbines, as reflected in the Company's response to OPUC data  
12          request 308.

13          ***Adjustment 7.9, OCAT & Metro SHS Adjustment***

14          **Q.     Please discuss the revisions to Adjustment 7.9, OCAT & Metro SHS Adjustment.**

15          A.     In response to OPUC data request 332, the Company has agreed to move the OCAT  
16          expense from FERC Account 40911 (State Income Taxes) to FEC Account 408 (Taxes  
17          Other Than Income), as it is expected to be deductible for federal and most state income  
18          taxes. In the same response, the Company had expressed an openness to moving the  
19          Metro SHS tax to FERC Account 408 as well, but upon further investigation, the  
20          Company has determined that the Metro SHS tax does represent an income tax that will  
21          largely be non-deductible for state income tax purposes, and therefore, has left this  
22          expense item to be an adjustment to FERC Account 40911.

1 **Q. Has there been any other adjustments related to taxes proposed in this case?**

2 A. Yes, AWEC proposes three additional adjustments to taxes or tax-related items.

3 AWEC's proposals related to tax benefits of PacifiCorp's holding company and state  
4 net operating loss deferred tax assets are addressed by Ms. Koblaha in her reply  
5 testimony. I will discuss AWEC's recommendation to remove a deferred tax asset  
6 related to the Oregon injuries and damages reserves balance below.

7 **Q. Does PacifiCorp agree with Mr. Bradley G. Mullins' position to remove the**  
8 **deferred tax asset (DTA) related to injuries and damages from the calculation of**  
9 **revenue requirement?**

10 A. No. Mr. Mullins is proposing to remove the balance in G/L account 287253 – DTA  
11 705.453 Reg Liability – OR Injuries & Damages Reserve, which represents the  
12 deferred tax balance for G/L account 288700 – Regulatory Liability – OR Injuries &  
13 Damages Reserve. G/L account 288700 represents Oregon's allocated share of actual  
14 Injuries & Damages accruals and associated reserve balances and is included in rate  
15 base, as seen in workpapers submitted in support of my direct testimony,  
16 "B15 – Miscellaneous Rate Base", row 76. The methodology to establish  
17 Oregon-specific accruals and associated reserve balances was approved via a  
18 stipulation in docket UE 217, Order 10-473 and has been in place since 2011. This  
19 Oregon-specific reserve balance has been included in Oregon's rate base balance in  
20 all filings after its approval and the Company is not proposing to change this reserve  
21 methodology treatment in the current GRC. Because G/L account 288700 is included  
22 in rate base, it is also appropriate to include the related deferred tax asset in rate base.

1 **E. TAB 8 – Rate Base**

2 **Q. What adjustments or revisions is the Company making in Tab 8, Rate Base**  
3 **Adjustments, for its reply filing?**

4 A. The Company has made revisions or updates to the following adjustments, discussed  
5 in more detail below in my testimony.

- 6 • Adjustment 8.6, Regulatory Assets & Liabilities Amortization
- 7 • Adjustment 8.13, Cholla Unit 4 Retirement
- 8 • Adjustment 8.14, Wind Project Deferrals Amortization
- 9 • Adjustment 8.15, Miscellaneous Rate Base

10 Similar to Adjustment 7.1, Interest True-Up, Adjustment 8.1, Cash Working Capital,  
11 also automatically recalibrates as part of the revenue requirement calculation in the  
12 Company's model.

13 ***Adjustment 8.6, Regulatory Assets & Liabilities Amortization***

14 **Q. Please address the updates to Adjustment 8.6, Regulatory Assets & Liabilities**  
15 **Amortization made in this reply filing.**

16 A. Consistent with the recommendation of Staff witness Mr. Fox, the Company has  
17 removed the proposed amortization of all Company proposed deferrals from base rates  
18 to be amortized on separate tariff schedules.

19 **Q. What is the Company's request with regards to the deferrals consolidated into**  
20 **this rate case?**

21 A. With exception of two deferral applications (UM 2142 – Deferred Accounting for  
22 costs associated with Cholla Unit 4 property taxes, and UM 2063 – Deferred  
23 Accounting of Costs Associated with the COVID-19 Public Health Emergency), the



1 Company's requests for deferral accounting in four other dockets (aside from UM  
2 2185 – Deferred Accounting for costs associated with Non-Contributory Defined  
3 Benefit Pensions Plans) is still pending in front of the Commission. These include:

- 4 • UM 1964 – Deferred Accounting for PacifiCorp's Transportation Electrification  
5 Program,
- 6 • UM 2134 – Deferred Accounting for costs associated with Cedar Springs 2,
- 7 • UM 2167 – Deferred Accounting for revenues associated with RECs from Pryor  
8 Mountain, and
- 9 • UM 2186 – Deferred Accounting for the costs associated for the TB Flats Wind  
10 Project.

11 In this proceeding, the Company is seeking Commission's approval for these  
12 deferrals, as well as to begin amortization of all deferrals listed above, with exception  
13 of COVID-related costs. The Company requested amortization over a three-year  
14 period.

15 **Q. What is Staff's position on the Company's deferral amortization requests?**

16 A. Mr. Fox recommends approval of all Company proposed deferrals (excluding  
17 UM 2185, separately addressed by another Staff witness) that have not yet been  
18 approved. Staff further recommends the Commission approve the  
19 December 31, 2022, balances for all requested deferrals addressed in the Company's  
20 direct testimony as prudent, and subject to amortization at the rate effective date of  
21 this rate case, with exception of a small correction to the Cedar Springs II deferral,  
22 which I will address specifically later in my testimony.

23 In addition, Staff is also recommending amortization of 2020 and

1 2021 deferred amounts in the COVID-19 deferral, except for approximately \$400  
2 thousand related to the Arrearage Management Plan (AMP), over three years as well.

3 Finally, Staff addresses AWEC's application in UM 2201, to return excess Fly  
4 Ash Revenues not reflected in rates between November 2021 to December 2022 to  
5 customers, also over three years.

6 In its recommendation regarding the collection of deferrals, Staff noted that  
7 absent the sizeable rate change across multiple filings before the Commission for  
8 PacifiCorp, Staff would have recommended a two-year amortization period. But  
9 under current circumstances, Staff is supportive of the Company's three-year  
10 amortization period proposal. However, Staff recommends recovery of these  
11 amortization amounts in separate rate adjustment schedules, so recovery can be  
12 discontinued upon full amortization of each amount at the end of the three-year  
13 amortization period. The Company notes that in Staff's revenue requirement model,  
14 it appears the recommended amortization expense proposed to be recovered on a  
15 separate rate schedule has not been excluded from its revenue requirement model,  
16 submitted in Mr. Fox's workpapers.

17 **Q. Please describe the corrections Mr. Fox described in his testimony for the Cedar  
18 Springs II deferral calculation?**

19 A. Mr. Fox's criticism of the Cedar Springs II deferral is two-fold. First, Mr. Fox notes  
20 that the deferral calculation should initiate on December 10, when the deferral  
21 application was filed, rather than December 8, when the asset was placed online and  
22 in-service. Mr. Fox's recommendation is reasonable, and the Company agrees to  
23 revise its calculation of the deferral amount assuming a starting date of

1 December 10, 2020.

2 Secondly, Mr. Fox suggests that the Company's return on rate base  
3 calculation for the Cedar Springs II deferral was not properly pro-rated to reflect the  
4 appropriate number of days that Cedar Springs II was in-service before 2021.

5 Mr. Fox claims that the Company's return on rate base for Cedar Springs II captures a  
6 full month of return of rate base for December 2020, rather than the 23 days between  
7 December 8 to December 31 that the asset was actually in-service and serving  
8 customers.

9 **Q. Is Mr. Fox's assertion regarding the pro-ration of return on rate base accurate?**

10 A. No. The figure reflecting the monthly return on rate base that Mr. Fox points to is  
11 only an intermediate step in the Company's calculation for the amount eligible to be  
12 deferred. The Company's approach to derive the deferral balance, as demonstrated in  
13 Table 3 below, is to calculate a full month's return on rate base plus a full month's  
14 expense, and then pro-rate the combination of these components by the eligible  
15 number of deferral days. With reference to Table 5, Line item A is the Pre-Tax  
16 Return that Staff believes needs to be pro-rated, rather than to reflect a full month's  
17 return on rate base. However, because the pro-ration factor, Line item J in Table 5, is  
18 being applied to the combination of Lines A through D in this table, Line item A's  
19 rate of return necessarily needs to be a full month's value. If the rate of return  
20 amount was already pro-rated by the number of days eligible for deferral, and then  
21 pro-rated again by the pro-ration factor in Line item J, the overall return on rate base  
22 in revenue requirement would be pro-rated twice.

1

**TABLE 5 – Calculation of Cedar Springs II Deferral Balance**

	<u>\$ Amount</u>	
A December 2020 Pre-Tax Return	663,859	Exh. PAC/1002/Cheung/276
B December 2020 O&M	35,861	Exh. PAC/1002/Cheung/276
C December 2020 Depreciation	105,417	Exh. PAC/1002/Cheung/276
D December 2020 Other Exp.	67,398	Exh. PAC/1002/Cheung/276
E Total December 2020 Rev Req (before Gross-up)	872,535	Total A through D
F Deferral Filing Date	12/10/2020	
G Last Day before UE 374 Rates Effective	12/31/2020	
H Days In-Service	21	= G - F
I Days in December 2020	31	
J Pro-ration Factors	67.74%	= H/I
K Revenue Requirement for Deferral	591,072	= J*E

2

Accordingly, with the noted correction by Mr. Fox to initiate deferral balance

3

accumulation starting on the date the corresponding deferral application was filed, the

4

Company calculates total deferral balance to be \$591 thousand on an

5

Oregon-allocated basis, rather than \$647 thousand as provided in my direct

6

testimony. This \$591 thousand, plus accumulated interest would begin amortization

7

as of the rate effective date of this case.

8 **Q.**

**How does the Company respond to Staff's recommendation to begin**

9

**amortization of two deferrals the Company did not include a request to amortize**

10

**it its direct filing?**

11 **A.**

The Company finds it reasonable to begin amortization of 2020 and 2021 recorded

12

amounts in the COVID-19 deferral. However, the Company does not agree with the

13

disallowance based on Staff's concerns with the management of AMP funds.

14

Mr. Meredith discusses and addresses Staff's concern in this regard in his reply

15

testimony. Also, the Company notes that the total deferred amounts Mr. Fox

16

tabulated as eligible for deferral did not reflect any interest accumulation on the

1 deferred amounts. As approved in Docket UM 2063 the utilities are approved to  
2 accrue interest at the modified blended treasury rate on COVID-19 deferral balances  
3 as per Order 22-139.<sup>21</sup>

4 **Q. Does the Company agree with the three-year amortization period for the 2020**  
5 **and 2021 COVID-19 deferred balance recommended by Staff?**

6 A. The Company appreciates the consistency in the application of a three-year  
7 amortization period recommendation on the COVID-19 deferral. However, because  
8 of the magnitude of the deferred balance, and the rate impact that comes with the  
9 potential rate changes across multiple filings the Company has pending in front of the  
10 Commission, the Company recommends a four-year amortization period in this  
11 instance, to help mitigate the effect of these amortizations on customer rates.

12 **Q. What about the Fly Ash Revenues Deferral?**

13 A. The Company does not agree with the recommendation to return excess fly ash  
14 revenues as per AWEC's application in docket UM 2201. In its application, AWEC  
15 asserts that since the conclusion of PacifiCorp's last general rate case, docket UE 374,  
16 the Company had entered into a new contract to sell fly ash that results in higher fly  
17 ash revenues than amounts built into rates. AWEC's request for the Company to  
18 return this revenue differential is predicated on this single-item variance, and lacks  
19 consideration for an overall picture that properly reflects PacifiCorp's earnings as a  
20 whole. For the period ended December 31, 2021, the Company reported in its annual

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<sup>21</sup> *In the Matter of PacifiCorp d/b/a Pacific Power, Application for Reauthorization to Defer Accounting Costs Associated with the COVID-19 Public Health Emergency, Docket UM 2063, Order No. 22-139, Appendix A at 6 (May 9, 2022).*

1 ROO reports that earnings were substantially lower than its approved ROE. On a  
2 normalized basis, the Company reported 5.482 percent ROE in its  
3 December 2021 ROO. This outcome reflects that the Company has been  
4 substantially, and severely under earning, even with new rates from docket UE 374  
5 becoming effective January 1, 2021. This means that, while fly ash sales revenues,  
6 just one component to the Company's revenue requirement, has shown substantial  
7 increase relative to amounts approved in rates, many other expenses have also risen  
8 drastically beyond approved levels, and more than fully offset the higher level of fly  
9 ash sales recorded under the new sales contract. Given the Company's already dismal  
10 earnings performance, to return this excess revenue, without any offsetting true-up of  
11 increased expenses would be one-sided and further erode the already low ROE in the  
12 2021 reporting period.

13 **Q. Should the Commission approve the fly ash revenues deferral, should AWEC's**  
14 **calculated deferral amount be adopted?**

15 A. No. AWEC calculated the deferral amounts using a simplified calculation, based on  
16 forecast amounts previously provided in the 2022 TAM. If the Commission were to  
17 approve AWEC's application, the amount eligible to be amortized should be  
18 calculated using actual revenues recorded between November 2021 and December  
19 2022, as the amounts become available. Further, the Company would support a  
20 three-year amortization period, consistent with Staff's proposal, and consistent with  
21 the requested amortization schedule on the other Company proposed deferrals'  
22 amortization period.

1 **Q. Have any other Parties opined on the Company’s deferral amortization**  
2 **requests?**

3 A. Yes. AWEC opposes the Company’s wind projects deferral, characterizing them as  
4 “problematic from a regulatory perspective”. AWEC argues that the minor amount of  
5 regulatory lag with respect to Cedar Springs II is not a valid reason to defer these  
6 costs. Further, AWEC recommends ratepayers be held harmless in connection with  
7 the delay in the in-service date in TB Flats. AWEC further asserts that PacifiCorp  
8 had the opportunity to file a rate case in 2021 to incorporate the costs for the TB Flats  
9 wind project but did not do so.

10 **Q. How do you respond to AWEC’s comments on the Wind Project Deferrals?**

11 A. Mr. Mullins’ arguments reflect an unreasonable and unprincipled approach aimed at  
12 reducing the Company’s request in this case. With regards to Cedar Springs II, this  
13 project was found to be prudent in the Company’s previous GRC (docket UE 374).  
14 The benefits of this project were included in the Company’s 2020 TAM calculations.  
15 Accordingly, the deferral and recovery of the associated costs simply serve to  
16 properly match the costs and benefits of this project reflected in customer rates.

17 TB Flats is a qualifying renewable resource under ORS 469A.120. As  
18 discussed in the direct testimony of Mr. Timothy J. Hemstreet in this proceeding and  
19 echoed in Staff witness Ms. Rose Anderson’s direct testimony, “...the COVID  
20 pandemic and associated supply chain disruptions and construction delays of TB Flats  
21 were outside of the control of the Company.”<sup>22</sup> The wind project was also approved  
22 as prudent in the 2021 GRC, with the portion attested to be placed in-service before

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<sup>22</sup> Staff/30, Anderson/3.

1 January 1, 2021 already included in rates that became effective at the beginning of  
2 2021. AWEC's argument that other offsetting factors, such as declining balances of  
3 accumulated depreciation and accumulated deferred income tax (ADIT) balances  
4 would have offset the cost associated with the delay implies there exists a  
5 requirement that a capital project should not be included in rates unless the new  
6 investment outpaces the accumulated depreciation and ADIT of existing assets. This  
7 is not an appropriate basis on which to assess whether an asset ought to be included in  
8 rates which is a prudent investment, and that it is in-service and serving customers.  
9 TB Flats meets both considerations.

10 AWEC's statement that PacifiCorp could have filed a rate case in 2021 is  
11 untenable. The Company's most recently decided rate case became effective on  
12 January 1, 2021. The preparation of a GRC is an endeavor that takes anywhere from  
13 six to eight months. Where TB Flats was fully placed in-service in July of 2021, the  
14 Company's current GRC filed in March 2022 is arguably the soonest one could be  
15 compiled since TB Flats has become fully in-service. Company witness Steward  
16 additionally describes why the disallowance of these projects is inconsistent with the  
17 stipulation from the proceeding that created the Renewable Adjustment Clause.

18 **Q. What is the total amount of the amortization on deferrals reflected in this case, if**  
19 **approved as discussed above?**

20 A. Excluding amortization for Pension Settlement Costs (docket UM 2185), based on  
21 Staff's proposal and the Company's response, annual amortization related to the  
22 collection of deferral balances discussed above amounts to approximately \$12.1



1 million. Please refer to my confidential Exhibit PAC/2004 for a breakdown of each  
2 deferral's annual amortization amounts, if approved as discussed above.

3 ***Adjustment 8.13, Cholla Unit 4 Retirement & Adjustment 8.14, Wind Deferral***  
4 ***Amortization***

5 **Q. Did any other adjustments need to be updated to reflect the move of all**  
6 **requested deferral amortization to separate tariffs.**

7 A. Yes. Adjustments 8.13, Cholla Unit 4 Retirement was updated to remove the annual  
8 amortization expense from the Cholla Unit 4 Property Tax deferral, and Adjustment  
9 8.14, Wind Deferral Amortization has also been zeroed-out to remove the proposed  
10 amortization expense out of base rates. The amortization schedules for these are  
11 included in my confidential Exhibit PAC/2004.

12 **Q. Were other rate base adjustments proposed to Cholla Unit 4 related assets?**

13 A. Yes. Staff witness Mr. Fox recommends the removal of land assets associated with  
14 Cholla, as well as Carbon from rate base on the basis that these plants have both been  
15 retired, and accordingly, these land balances are no longer used and useful to Oregon  
16 customers. Mr. Fox proposes to remove \$1.4 million rate base, on a total-company  
17 basis, from the case for Carbon and Cholla land.

18 **Q. What is the Company's response to the proposals to remove land assets for**  
19 **plants already retired?**

20 A. The Company does not agree that the land should be removed as it is a necessary part  
21 of the associated plants and should be allowed in rate base. The Company cannot  
22 retire and dispose of the land until the necessary remediation work is complete on the  
23 Carbon and Cholla sites. Where the remediation work is necessitated by the years of

1 generating power on these sites that ultimately served customers, it is reasonable to  
2 continue including the land balance in rates until such time they can be safely  
3 disposed of and retired from the Company's books.

4 **Q. Is the revenue requirement impact of \$118 thousand decrease as calculated by**  
5 **Staff correct?**

6 A. No. Staff's calculation incorrectly includes an adjustment to Oregon's revenue  
7 requirement for the total-company \$1.4 million land value, rather than the  
8 Oregon-allocated amount. The Oregon-allocated value of the land in contest is only  
9 \$355 thousand, which means the revenue requirement impact of \$118 thousand as  
10 stated in Mr. Fox's workpaper is substantially overstated.

11 **Q. Does the Company have an alternative proposal with respect to the Carbon and**  
12 **Cholla land?**

13 A. The Company's primary recommendation is to continue including the land balances  
14 in rate base. If the Commission decides the land amounts should be removed from  
15 the rate case, the Company proposes that the land pieces should be paid off and  
16 suggests amortizing that value over a one-year period.

17 *Adjustment 8.15, Miscellaneous Rate Base*

18 **Q. Has an update been made to Adjustment 8.15, Miscellaneous Rate Base?**

19 A. Yes. Although previously, in response to OPUC data request 231, the Company had  
20 stated it had not intended to update fuel stock balances in the GRC, the Company did  
21 end up making an update to fuel stock balances to better reflect the forecasted  
22 consumption levels that is consistent with the Company's TAM reply filing in  
23 docket UE 400. Further description of this update can be found in the reply testimony

1 of Mr. James Owen. This update resulted in a net decrease in rate base.

2 **Q. Were other adjustments proposed to fuel stock in this case?**

3 A. Yes. AWEC witness Mr. Mullins proposes two adjustments to the Company's Test  
4 Period fuel stock balances. Mr. Mullins recommends to include the fuel stock  
5 balance on an end-of-period December 31, 2022 basis, rather than the 13-month  
6 average fuel stock balance at December 31, 2023 as the Company has included in the  
7 Test Period. Mr. Mullins also proposes to completely remove the Rock Garden fuel  
8 stock balance from the rate case.

9 **Q. What rate base methodology does Mr. Mullins claim the Company uses for fuel**  
10 **stock inventory?**

11 A. Mr. Mullins is inconsistent in his testimony, stating that the Company's fuel stock  
12 balance is based on a 13-month average forecast for the year ending December 2022<sup>23</sup>  
13 in one instance, and in another, states the Company's fuel stock inputs were based on  
14 a 12-month average ending December 2023.<sup>24</sup>

15 **Q. To clarify, what rate base methodology does the Company use for fuel stock**  
16 **inventory?**

17 A. The Company has included fuel stock inventory on a 13-month average basis through  
18 the Test Period ending December 2023.

19 **Q. Does the Company agree that the fuel stock balance should be included in the**  
20 **Test Period at the end-of-period December 31, 2022, balance?**

21 A. No. The Company does not agree that fuel stock should be included at end-of-period  
22 December 31, 2022, balances. Rate base, in this case, reflected in the Test Period are

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<sup>23</sup> AWEC/100, Mullins/17:12-13.

<sup>24</sup> AWEC/100, Mullins/17:19-21.

1 consistently reported using a 13-month average methodology through December  
2 2023. The only exception is for capital additions, which is subject to the used and  
3 useful standard in Oregon, and must be placed in-service by the requested rate  
4 effective date of this case. For this reason, pro forma capital additions are only  
5 included through December 31, 2022, and are reported on an end-of-period basis.  
6 The Company has followed the approved methodology for including fuel stock at the  
7 13-month average level during the Test Period. This same methodology was used and  
8 approved in the Company's last GRC, docket UE 374. As such, AWEC's claims that  
9 the Company has been inconsistent in its methodology is simply not true.

10 **Q. AWEC states that using a normalized approach to forecast fuel stock would**  
11 **reflect a constant level over the Test Period with no increases or decreases. Is**  
12 **this a correct observation?**

13 A. No. Having a Test Period with no net increase or decrease is a mischaracterization of  
14 normalization. A more accurate representation of normalization is to take an average  
15 over the Test Period, as the Company has submitted in this filing.

16 **Q. Does the Company agree that it is appropriate to remove the Rock Garden fuel**  
17 **stock balance from the rate case?**

18 A. No. The Company does not agree that this is an appropriate adjustment. Please refer  
19 to the reply testimony of Mr. Owen for a discussion of why this adjustment is  
20 inappropriate.

1 **Q. Did AWEC propose other adjustments to items included in Miscellaneous Rate**  
2 **Base?**

3 A. Yes. AWEC recommends the Commission remove approximately \$40.0 million,  
4 Oregon-allocated, of prepayments from rate base under the premise the financing  
5 costs associated with these balances are included in the Company's cash working  
6 capital calculation. Furthermore, AWEC claims that these balances do not reflect the  
7 actual cash payment made but rather an accounting accrual. AWEC has calculated the  
8 impact of this adjustment as a reduction in revenue requirements of \$3.7 million.

9 **Q. What do prepayments represent?**

10 A. Prepayments represent a cash outlay, rather than an accounting accrual as  
11 characterized by Mr. Mullins, made by the Company in advance of when the services  
12 are received and are then amortized over the life over which the service is received.  
13 The Company includes prepayments in rate base as compensation for the time value  
14 of money due to the upfront cash outlay. AWEC has proposed to remove two  
15 categories of prepayments. Approximately \$11.1 million, Oregon-allocated rate  
16 based associated with prepayments recorded in FERC account 165 and approximately  
17 \$28.9 million, Oregon-allocated rate base associated with prepaid maintenance  
18 recorded in FERC account 186.

19 Of the \$11.1 million of Oregon-allocated rate base recorded in FERC  
20 account 165, approximately \$8.1 million represents two major prepayments, OPUC  
21 Fees and Hardware/Software prepayments. The Company makes a payment for  
22 OPUC Fees around March of each year. This amount represents the fees used to fund  
23 Commission operations for the coming year. As such, the Company records the entry

1 as a prepayment and then amortizes this amount over the period for which these funds  
2 are used. Similarly, the Company records amounts associated with  
3 subscription-based software and hardware and amortizes these expenses over the  
4 period which the subscription is dated. Additional prepayments are made for water  
5 rights, rents, insurance, taxes, and maintenance costs.

6 FERC account 186 represent prepaid maintenance on certain gas and wind  
7 plants. Of the \$28.9 million Oregon-allocated rate base, approximately \$21.2 million  
8 is specifically related to prepaid maintenance on the Company's gas plants. This  
9 prepaid maintenance represents variable fee payments that are made to the turbine  
10 manufacturer. In return for the variable fee, the original equipment manufacturer  
11 (OEM) contractor agrees to provide "program parts" that are replaced during each  
12 different overhaul type (combustion, hot gas path, and major overhaul). In addition,  
13 the contractor warrants the program parts will operate for a specified number of hours  
14 or equipment starts until it is time to perform the next overhaul. Customers benefit by  
15 these long-term service contracts because the manufacturer assumes some of the  
16 financial risks associated with certain equipment failures and subsequent costs  
17 associated with component replacement. This account includes similar long-term  
18 maintenance contracts on certain wind plants as well.

19 **Q. Does the Company agree that prepayments are included in cash working capital**  
20 **and should be removed from rate base?**

21 A. No. The Company includes a calculation for cash working capital in rate base using a  
22 2015 lead lag study. The cash working capital amount evaluates accounts payable,  
23 accounts receivables, and revenues in which a daily cost of service is determined.

1 This cash working capital amount is used to compensate the Company for the cash  
2 outlay needed to operate the Company. In other words, cash working capital  
3 represents a timing difference between when revenues are received versus when  
4 expenses are paid.

5 AWEC's recommendation is to remove prepayments and long-term prepaid  
6 maintenance. The 2015 Lead Lag study includes consideration of prepayments,  
7 however, unlike most items, prepayments are recorded using a negative lag. Negative  
8 lag means that the Company paid an amount in advance of when the services were  
9 received. Furthermore, negative lag is reducing the cash working capital requirement  
10 from rate base because the Company records this balance separately in FERC  
11 account 165. Removing prepayments would provide the Company no compensation  
12 for the time value of money in which the Company has funded operations in advance  
13 of the service. Additionally, since this amount is already credited in the cash working  
14 capital calculation, further removing the prepayments from rate base would unfairly  
15 harm the Company for the advance cash outlay.

16 Long-term prepaid maintenance largely represents amounts paid in advance  
17 for significant maintenance on gas or wind plants. This maintenance is often  
18 capitalized to the underlying asset and recovered through depreciation expense.  
19 Depreciation expense is not included in the Company's 2015 Lead Lag study. The  
20 Company recommends the Commission reject AWEC's proposal to remove these  
21 balances that has a long history of being included in rate base.

1 **Q. Did AWEC correctly calculate the impact of removing prepayments and prepaid**  
2 **maintenance from rate base?**

3 A. No. When AWEC calculated the removal of these balances from rate base it did so  
4 only looking at the base period. When the Company prepares pro forma capital,  
5 certain overhaul projects are considered and assumed to be placed in-service. As  
6 discussed previously, these overhaul expenses could be prepaid and an adjustment  
7 would be required to properly reflect the appropriate prepaid maintenance balance in  
8 rate base. Accordingly, the Company included in its revenue requirements  
9 calculations Adjustment 8.15 - Miscellaneous Rate Base, which adjusted these  
10 balances to reflect Test Period levels. After consideration of this adjustment, a proper  
11 calculation of AWEC's recommendation would have been to remove  
12 Oregon-allocated rate base of \$35.6 million, \$4.4 million less than calculated by  
13 AWEC.

14 ***Other Proposed Rate Base Adjustments***

15 **Q. Several adjustments were proposed by AWEC to balances related to Trapper**  
16 **Mine Rate Base. Can you summarize these adjustments?**

17 A. AWEC proposes two adjustments as they relate to the Trapper Mine, to include the  
18 reclamation liability in rate base, but to exclude the Trapper Mine from rate base. It  
19 should be noted that these adjustments together simply do not make sense. If  
20 AWEC's primary recommendation is to disallow the Trapper Mine due to prudence,  
21 it should not be recommending inclusion of the reclamation liability. If AWEC is  
22 recommending including the reclamation liability in rate base, it should be included  
23 only if the mine asset is prudent and also included.



1 **Q. Why is AWEC recommending the Trapper Mine be excluded from rate base?**

2 A. AWEC's recommendation is based on one, single data request, AWEC data request  
3 056. This data request asked the Company to provide the initial date on which mining  
4 at each pit began at the Trapper Mine. The Company responded stating, "Trapper  
5 Mine does not maintain a report with this information." The Trapper Mine began  
6 operations 1977 and provides coal to the Craig generating plant. The Company  
7 currently owns 29.14 percent interest in the mine.

8 **Q. Should the Company's response to AWEC data request 056 be the basis for  
9 determining prudence for the Trapper Mine?**

10 A. No. The Company is seeking approval to include in rate base the Trapper Mine for  
11 purposes of operations in the Test Period. AWEC does not provide any support or  
12 justification on why the Trapper Mine should be disallowed in the Test Period. This  
13 Commission has approved prudence of the Trapper Mine in prior GRCs. None of the  
14 circumstances under which the Trapper Mine was determined to be prudent has  
15 changed in this case. Accordingly, the Company requests the Commission continue  
16 to approve the inclusion of Trapper Mine in rate base for recovery. AWEC's  
17 adjustment should be rejected.

18 **Q. AWEC makes a separate adjustment to add the Trapper Mine reclamation  
19 liability in rate base. Is the recommendation appropriate?**

20 A. No, the Trapper Mine reclamation liability is already included in rate base through its  
21 inclusion in Base Period data, and any further adjustment would double count this  
22 amount. When the Company forecasts the Trapper Mine reclamation liability  
23 balance, it begins with the Base Period balance. As provided in the Company's

1 response to AWEC data request 019, the Base Period balance is recorded in FERC  
2 Account 253.3. The Company then prepares an adjustment that walks the balance  
3 from the Base Period to the Test Period. AWEC claims that because the Base Period  
4 balance is included in cash working capital, it is replaced with the Company's cash  
5 working capital calculation based on the 2015 Lead Lag Study and therefore  
6 excluded. This is an incorrect assertion.

7 The Company includes a variety of working capital in the Test Period. A  
8 portion of these dollar are referred to as cash working capital and calculates a daily  
9 cost of service used as compensation for funding operations of the Company. This  
10 amount is calculated using data from the 2015 Lead Lag Study, and can be found in  
11 Exhibit PAC/1002, Cheung/40, on lines 2136-2140 under FERC Account "CWC".  
12 The other portion of these funds are for other working capital items, such as the  
13 Trapper Mine reclamation liability, are reflected on the same page referenced above,  
14 but on lines 2143-2157. These are isolated and represented in accounts that are not  
15 part of the cash working capital balances derived based on the 2015 Lead Lag Study.  
16 As such, the Company already reflected a reduction in rate base for the reclamation  
17 liability in the Base Period and the adjustment required to reflect this balance  
18 appropriately in the Test Period through FERC Account 253.3. No further adjustment  
19 is necessary.

1 **Q. AWEC also claims the Company should reflect this balance on a year-end basis**  
2 **instead of the 12-month average balances. How do you respond?**

3 A. The Company has a long history in prior general rate cases of reflected working  
4 capital balances on a 12-month average basis. This is largely because the majority of  
5 working capital is used to fund operations for a calendar year. Accordingly,  
6 12-month averaging consistently aligns the cash required to fund operations with the  
7 rate base balances. For this reason, the Company continues to support a 12-month  
8 average basis as appropriate for cash working capital balances included in the  
9 calculation of revenue requirement in this docket.

10 **Q. What other adjustment is proposed by Mr. Mullins in this case?**

11 A. Mr. Mullins recommends the Company remove the “OR VHF (VPC) SPECTRUM”  
12 project from rate base. Mr. Mullins makes his adjustment based on the Company’s  
13 response to AWEC data request 047. He states PacifiCorp’s response did not identify  
14 whether the project benefits ratepayers, nor indicate that the spectrum is used and  
15 useful for Oregon customers. In addition, PacifiCorp is including the spectrum rights  
16 as a perpetual addition, with no defined associated amortization. He claims it is not  
17 clear from the data response when the rights were acquired, and to require customers  
18 to provide a perpetual return on an asset is not reasonable.

19 **Q. Is there merit to AWEC’s assertions?**

20 A. No. In the Company’s response to AWEC data request 047, the Company explained  
21 that the “OR VHF (VPC) SPECTRUM” was a part of the Old Mobile Radio project  
22 where the Company purchased exclusive rights to specific channel frequencies to be  
23 used for the Company’s microwave operations. PacifiCorp’s finance department

1 reviews intangible assets every six months to verify they are still being used. The  
2 Company was required to move to narrow band frequencies and narrow band radios  
3 by the Federal Communications Commission, as part of the Mobile Radio  
4 Replacement Project, that was included in the Oregon 2014 GRC (docket UE 263).  
5 The reference to “Old” in the project description is simply a way to distinguish  
6 between the spectrum frequencies in question, and the narrow band frequencies from  
7 the 2014 GRC, and by no means indicate that these frequencies are no longer in-  
8 service.

9 The argument that customers should not pay a perpetual return on assets is  
10 unjustified. The Company earns a return on land and that is a perpetual asset that is  
11 not depreciated. Rights to a radio frequency spectrum is considered an indeterminate  
12 intangible asset, which is why there is no amortization. This asset should still earn a  
13 return, especially since that radio frequency continues to be used for efficient crew  
14 dispatch, daily crew operations and emergency response.

15 Accordingly, the Company disagrees with Mr. Mullins’ characterization of  
16 this asset as not used and useful for Oregon customers and recommends the  
17 Commission reject his proposal.

18 **Q. Please discuss AWEC’s proposed adjustment to Environmental Regulatory**  
19 **Assets.**

20 A. AWEC contends that it is inappropriate to include the Environmental Regulatory  
21 Assets. AWEC argues that these costs are possibly imprudent, and this treatment is  
22 not consistent with regulatory accounting.<sup>25</sup>

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<sup>25</sup> AWEC/100, Mullins/9-11.

1 **Q. Are these Environmental Remediation Costs imprudent?**

2 A. No, as described in further detail in the testimony of Company witness James Owen,  
3 these costs are prudently incurred remediation costs that result from providing electric  
4 utility services at the scale that PacifiCorp does.

5 **Q. Is PacifiCorp's treatment of these assets appropriate and regularly reviewed by**  
6 **the Commission?**

7 A. Yes, I have attached a copy of the relevant pages of PacifiCorp's revenue requirement  
8 exhibit from docket UE 147, as Exhibit PAC/2005, which shows the existence and  
9 inclusion of this regulatory asset in rate cases. This regulatory asset has been included  
10 in PacifiCorp's rate base since at least 2003, and has been included and reviewed by  
11 parties, stakeholders, and the Commission staff since that time.

12 **Q. Has this treatment been reviewed in contexts outside of a general rate**  
13 **proceeding?**

14 A. Yes, this regulatory asset has been included in PacifiCorp's annual ROO which are  
15 filed in April each year for reporting periods ending December the year prior.  
16 Specifically, it is included in the schedule of regulatory assets and regulatory  
17 liabilities that has accompanied each annual ROO filing since the December 2019  
18 reporting period. This regulatory asset is identified in the table as "188010 – Reg  
19 Asset-Environmental Spend". I have included PacifiCorp's Schedule of Regulatory  
20 Assets and Regulatory Liabilities from its most recent ROO for 12 months ended  
21 December 2021 as Exhibit PAC/2006.

1 **Q. Please explain why including these costs as a regulatory asset benefits**  
2 **customers?**

3 A. As Company witness Owen explains, these are costs to maintain compliance with  
4 applicable environmental regulations. However, the timing of these expenses do not  
5 follow any pattern or trend that can be forecasted. Therefore, the deferral and  
6 amortization approach that has been used for nearly twenty years has benefitted  
7 customers by smoothing out the effect of these costs and avoiding drastic rate  
8 fluctuations from recovery of these mandated costs that cannot be avoided.

9 **F. TAB R – Reply Adjustments**

10 **Q. Please describe the new Tab R included in Exhibit PAC/2002.**

11 A. Tab R incorporates adjustments to the case that are presented individually for ease of  
12 calculation and visibility. The following adjustments have been added to this section  
13 of the exhibit.

- 14 • Adjustment R\_1, Meter Replacement Amortization Adjustment
- 15 • Adjustment R\_2, Clean Fuels Program Amortization
- 16 • Adjustment R\_3, Remove Merwin In-Lieu Project
- 17 • Adjustment R\_4, Update Cross Hollows Install 2<sup>nd</sup> Xfmr-Trans Project
- 18 • Adjustment R\_5, Remove Electric Vehicle
- 19 • Adjustment R\_6, Capitalized Officers' Incentives Adjustment
- 20 • Adjustment R\_7, AURORA Access Fees
- 21 • Adjustment R\_8, Advertising Expense Removal

1 *Adjustment R\_1, Meter Replacement Amortization Adjustment*

2 **Q. Please describe Adjustment R\_1, Meter Replacement Amortization Adjustment.**

3 A. This adjustment removes the annual amortization expense related to the AMI  
4 Replaced Meters that were recorded to a regulatory asset as per Order 20-473 in the  
5 Company's last GRC, to be amortized over five years on a separate tariff schedule.  
6 For this reason, this amortization should not be included in base rates, and  
7 accordingly, the Company agrees it is appropriate to remove it in its reply filing. The  
8 net impact of this adjustment reduces revenue requirement by approximately \$1.0  
9 million on an Oregon-allocated basis.

10 *Adjustment R\_2, Clean Fuels Program Amortization*

11 **Q. Please describe Adjustment R\_2, Remove Clean Fuels Program Amortization.**

12 A. In response to OPUC Data Request 428, the Company has agreed to remove certain  
13 expenses associated with the Oregon Clean Fuels Program Amortization from the  
14 Base Period as these costs should not be included in base rates. Staff witness Mr.  
15 Shierman supports this adjustment.

16 **Q. Did Staff calculate their adjustment removing these expenses correctly?**

17 A. No. The Company provided transactional line-item detail in its response to Staff data  
18 request 142 for two different twelve-month periods; July 2019 through June 2020 and  
19 July 2020 through June 2021. When Staff removed these associated expenses, it  
20 removed the expense amounts from both time periods for which the transactional  
21 line-item detail was provided. The Base Period data used in this docket was for July  
22 2020 through June 2021 only. Therefore, the amounts provided for the period prior to  
23 this are not necessary to remove, as these costs were not included in the Company's

1 calculation of revenue requirement to begin with. Accordingly, the Company has  
2 removed \$1.24 million in expense from the Base Period, representing the  
3 amortization amounts recorded in the 12 months ended June 2021. The Company  
4 calculates the impact of this adjustment to be a reduction to Oregon revenue  
5 requirement of \$1.3 million.

6 ***Adjustment R\_3, Remove Merwin In-Lieu Project***

7 **Q. Please describe Adjustment R\_3, Remove Merwin In-Lieu Project.**

8 A. The Company's direct filing included a Merwin Downstream In-Lieu capital project.  
9 However, since the time of the direct filing, the National Marine Fisheries Service  
10 and United States Fish and Wildlife Services are now requiring the construction of  
11 two new facilities to facilitate upstream and downstream fish passage from the  
12 Merwin Reservoir, and as a result, the "in-lieu" funding will be removed. In its  
13 OPUC data request 229—1<sup>st</sup> supplemental response, the Company committed to  
14 removing this project from test year rate base in its reply testimony. This adjustment  
15 reflects the removal of the project and reduces Oregon revenue requirement by  
16 \$438 thousand.

17 ***Adjustment R\_4, Update Cross Hollows Install 2nd Xfmr-Trans Project***

18 **Q. What update is reflected in Adjustment R\_4, Update Cross Hollows Install 2nd**  
19 **Xfmr-Trans Project?**

20 A. This adjustment reflects a correction to the "Cross Hollows Install 2<sup>nd</sup> Xfmr – Trans"  
21 project as identified in the Company's response to OPUC data request 488. The  
22 revenue requirement impact on Oregon of this adjustment is a decrease of  
23 \$50 thousand.



1 *Adjustment R\_5, Remove Electric Vehicle*

2 **Q. Please describe Adjustment R\_5, Remove Electric Vehicle.**

3 A. This adjustment removes an electric vehicle from Oregon rate base because this  
4 specific vehicle was confirmed to have been moved to another state since direct  
5 testimony was filed in this proceeding. This move was identified in the Company's  
6 response to OPUC data request 433. This adjustment reduces revenue requirement  
7 by approximately \$3 thousand on an Oregon-allocated basis.

8 *Adjustment R\_6, Capitalized Officers' Incentives Adjustment*

9 **Q. Please describe Staff's proposed Capitalized Officers' Incentives Adjustment?**

10 A. Staff proposes to remove from rate base \$1.1 million on an Oregon-allocated basis for  
11 the total officer incentives capitalized based on the amount of AIP awards for NEOs,  
12 capitalized to FERC account 107 (Construction Work In Progress) for all years  
13 provided in the Company's response to OPUC data request 313.

14 **Q. Was Staff's proposed adjustment to capitalized officers' incentives consistent  
15 with the adjustment that was adopted in docket UE 374?**

16 A. No. In the Company's last GRC, the Commission adopted Staff's recommended  
17 adjustment for capitalized officer incentives. Based on Staff's testimony in docket  
18 UE 374, Staff witness Cohen stated that "Staff typically disallows the total amount of  
19 officer incentives capitalized in plant since the last rate case."<sup>26</sup> In the GRC, docket  
20 UE 374 was requested to be effective January 2021, while the most recent GRC  
21 previous to it had rates effective January 2014. Based on that, Staff's adjustment in  
22 the docket UE 374 sought to remove capitalized incentives between years 2015

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<sup>26</sup> Staff/400, Cohen/10:7-8.

1 through 2020 inclusive. For more recent years where actual capitalized officers'  
2 incentives amounts were not yet known or was not expected to be known in time to  
3 meet filing deadlines, Staff used an alternative method by developing a historical  
4 average as a placeholder. For example, to obtain the amount for 2020, the average of  
5 five historical years 2015 to 2019 was used. In the current GRC, Staff is proposing a  
6 removal of capitalized officers' incentives for all years back through to 2010. This  
7 approach is inconsistent with the adopted adjustment in UE 374, in that it deviates  
8 from Staff's approach to disallow the total amounts of officers' incentives capitalized  
9 in plant since its most recent previous case, and reaches well beyond the number of  
10 years for which capitalized officers' incentives were disallowed compared to the last  
11 case.

12 **Q. What justification or reasoning has Staff provided in support of deviating from**  
13 **the previously ordered adjustment methodology?**

14 A None, really. Staff witness Cohen states that "Staff calculates the total officer  
15 incentives capitalized in plant since 2010 to be approximately \$1.1 million."<sup>27</sup> A  
16 footnote in the testimony then points to the Company's response to OPUC data  
17 request 313.<sup>28</sup> There does not appear to be any further discussion on why the  
18 adjustment reaches back to 2010 to calculate the capitalized incentives adjustment,  
19 when the adopted adjustment from the last case was based on Staff's recommendation  
20 which calculates the capitalized incentives amount based on years since the  
21 Company's most recent, previous general rate case.

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<sup>27</sup> Staff/600, Cohen/6-7:15-2.

<sup>28</sup> Staff/600, Cohen/7, fn. 18.

1           Applying the same reasoning in the current case, the Company's most recent  
2           previous general rate case (docket UE 374) was effective 2021. In this proceeding,  
3           the Company's is requesting a rate effective date of January 1, 2023. Accordingly,  
4           years for which capitalized incentives disallowance should be considered would only  
5           be the one year in between 2021 and 2023, which would be 2022.

6   **Q.   Does the Company agree that an adjustment to capitalized officers' incentives**  
7   **should be included in accordance with what was adopted in docket UE 374, in**  
8   **Order 20-473.**

9   A.   Yes. Accordingly, the Company has calculated in Adjustment R\_6, Capitalized  
10   Officers' Incentives adjustment to remove the estimated capitalized officers'  
11   incentives balance for 2022. Similar to Staff's alternative methodology in the  
12   previous case for amounts not yet known, the Company applied a historical average  
13   calculated using five historical years data from 2017 through 2021 to estimate the  
14   2022 capitalized incentives amount. The Company then removed the  
15   Oregon-allocated portion of this estimated 2022 capitalized incentive balance, along  
16   with an imputed depreciation expense from Test Period results. By applying a  
17   methodology consisting with that of the adopted adjustment proposed by Staff in the  
18   last GRC, the Company calculated an adjustment that resulted in a net decrease in  
19   Oregon revenue requirement of approximately \$11 thousand.

20   *Adjustment R\_7, AURORA Access Fees*

21   **Q.   Please describe Adjustment R\_7, AURORA Access Fees.**

22   A.   Annually, in the Company's TAM filings, intervenors will require access to the  
23   AURORA model to facilitate their review of the Company's NPC calculations. An

1 annual estimation of these fees has been included in test year results at the contractual  
2 cost for 2023. Based on the participation level in the 2023 TAM, the Company has  
3 built into test year expenses the cost of four access licenses. This adjustment adds  
4 approximately \$39 thousand to the Oregon revenue requirement in this case.

5 *Adjustment R\_8, Advertising Expense*

6 **Q. Please describe the adjustments being proposed by OPUC for advertising**  
7 **expenses.**

8 A. Staff is proposing removal of Category C advertising expenses and removal of  
9 unclassified advertising expenses identified in the Company's response to OPUC data  
10 request 176, specifically, Attachment OPUC data request 176-1.

11 **Q. Why is OPUC Staff recommending the Category C advertising expenses be**  
12 **removed?**

13 A. Staff's recommendation seems to be proposed on the basis that the Company has not  
14 demonstrated sufficient evidence to justify its inclusion in rates. Staff also notes what  
15 they observe as a contradiction with regards to Blue Sky program expenses with  
16 regards to Category C advertising expenses. Staff cites to the Company's original  
17 response to OPUC SDR 104's response, and subsequent responses in OPUC data  
18 request 360-362 as contradictory to each other, and through this contradiction, the  
19 Company has not met its burden of proof that Category C expenses are just and  
20 reasonable to include in rates.

1 **Q. Are the responses to OPUC SDR 104 and subsequent data requests referenced**  
2 **contradictory to each other?**

3 A. No. In the Company's response to OPUC data request 362, the Company clarified  
4 that its original response to OPUC SDR 104, subpart f, had mistakenly omitted the  
5 word "not", and should read "The following programs do *not* include advertising  
6 during the Test Year. Funds for these programs are collected through a separate tariff  
7 and not part of base rates." The programs referenced in this statement include Blue  
8 Sky. Therefore, what Staff has characterized as a "contradiction", is in fact a  
9 correction the Company is confirming as needed.

10 **Q. To clarify then, are Blue Sky program expenses reflected in base rates?**

11 A. No. The Blue Sky program is a self-sustained voluntary program that does not  
12 impact revenue requirement.

13 **Q. Can you provide further detail on the Category C expenses identified by Ms.**  
14 **Jent?**

15 A. Yes. The Company's review of the expense items flagged by Ms. Jent for removal  
16 from the Test Period resulted in the information below:

1

**TABLE 6 – FERC 909 Category C Advertising Expenses**

Text	Oregon Allocated \$ (Corrected) with Test Year Escalation	Reason for Expense
OR PR/Media Relations Support	21,568	Historic Windstorms through Oct. 15, 2020
OR media relations	16,779	Historic Windstorms through Sep. 15, 2020
Earned media opportunities - all states	8,468	Pacificorp Community Support
Project Support per Rate Card Pricing	5,819	Pacificorp Community Support
Project Support per Rate Card Pricing	2,479	Pacificorp Community Support
OR PR support	2,440	Historic Windstorms through Nov. 15, 2020
Blue Sky Inv Reimb-Block 2020 Dec	1,683	Removed in Adj. 4.1, PAC/1002
Project Support per Rate Card Pricing	1,180	Issues Management & IRP Support
OR miniboats PR	765	Mini boat Livestream Event Series
Project Support per Rate Card Pricing	332	Issues Management & IRP Support
PR Support	202	Issues Management & IRP Support
LINKEDIN job posting -VP, Communications # REQ 105	169	LINKEDIN job posting - VP, Communications
Vice President,CorporateCommunications - 105363	18	Indeed, VP, Communications
<b>FERC 909 - Category C</b>	<b>61,903</b>	

2

**TABLE 7 – FERC 930.1 Category C Advertising Expenses**

FERC Acct	Oregon Allocated \$ (Corrected) with Test Year Escalation	Reason for Expense
930.1	3,569	Reallocation of Hydro Expenses - nets zero in Test Year through FERC 539
930.1	1,748	Job Postings - various posts
930.1	63	Thank You Veterans Ad
930.1	(104)	Black Hills Corporation (JV Cutback)
<b>930.1 - Category C</b>	<b>5,275</b>	

3

The Company confirms that expenses reflected in its requested Category C for

4

recovery does not reflect Blue Sky program costs. The single line item that does

5

reflect “Blue Sky” in its description is already being removed through Adjustment

6

4.1, Miscellaneous Expense & Revenues adjustment in this case.

7 **Q.**

**Why is OPUC Staff recommending the unclassified advertising expenses be removed?**

8

9 **A.**

Staff recommends the removal of unclassified advertising expenses provided in the

10

Company’s response to OPUC data request 176 on the basis that these expenses were

11

being allocated into Oregon rates despite providing direct benefits for states other

1 than Oregon, or the expenses not falling under the allowable definition of advertising  
2 expenses. Staff's recommended adjustment totals a removal of \$44,305 in escalated  
3 advertising expenses on an Oregon-allocated basis. This amount translates to an  
4 Oregon-allocated amount of \$40,532 before escalation.

5 **Q. Does the Company agree with removing unclassified advertising expenses in its**  
6 **entirety from the case as proposed by Staff?**

7 A. No. In response to Ms. Jent's concerns, the Company took a closer look at the  
8 expenses in question. In further review of the Oregon-allocated \$44,305 of escalated  
9 unclassified lines identified by Staff, PacifiCorp verified that:

- 10 • \$1,619 should be classified as Category A expenses,
- 11 • \$3,048 should be classified as Category B expenses,
- 12 • \$133 should be classified as Category C expenses,
- 13 • \$14,191 of wildfire safety for states other than Oregon was already removed from the  
14 base year through the Company's adjustment to advertising expenses in Adjustment  
15 4.1, as discussed in Figure 3 of Ms. Jent's testimony on Staff/1200/Jent/7
- 16 • and \$1,596 are labor-related expenses and are normalized to properly reflect Test  
17 Year levels through the Wages & Employees Benefits Adjustment. as they are labor  
18 and captured in another adjustment.

19 Taking into account the above reclassification, the remaining amount of  
20 Oregon-allocated unclassified advertising expenses is \$23,717 that the Company  
21 agrees should be re-allocated out of Oregon rates. This translates to a pre-escalation  
22 O&M adjustment of \$21,699. (Escalation is reflected through Adjustment 4.10,  
23 O&M Escalation Adjustment). Based on the above discovery, the Company has

1 prepared a revised response to OPUC data request 176 to provide the latest  
2 information. This revised data response was submitted on July 15, 2022.

3 **Q. In summary, what is the Company's response to OPUC Staff's proposal**  
4 **regarding the Category C and Unclassified advertising expenses?**

5 A. The Company rejects Staff's recommendation to remove Oregon-allocated Category  
6 C advertising expenses of \$44,305. Regarding the removal of the unclassified  
7 advertising expenses, the Company partially accepts Staff's adjustment to remove  
8 unclassified expenses, but only in the amount of \$23,717 on an Oregon-allocated  
9 basis, instead of Staff's recommendation of \$44,305.

10 **G. Jurisdictional Loads Allocation Adjustments**

11 **Q. Aside from the update to jurisdictional loads calculation described at the**  
12 **beginning of your testimony, were any other revisions or updates adopted?**

13 A. No.

14 **Q. Were any adjustments proposed by Parties?**

15 A. Yes, AWEC proposes two adjustments to jurisdictional loads calculation for  
16 allocation purposes. AWEC is advocating that both the load and demand related to a  
17 Utah large load customer taking service under Utah Electric Schedule No. 34 (Utah  
18 Schedule 34) be included in the jurisdictional allocation factors used in the 2020  
19 Protocol. More specifically, AWEC incorrectly claims that the Company's current  
20 treatment for this Utah Schedule 34 customer is not consistent with the 2020 Protocol,  
21 which requires all load PacifiCorp serves to be included in the load based dynamic  
22 allocation factors. AWEC's calculated impact of this recommendation to revised  
23 allocation factors would decrease Oregon's revenue requirement in this case by



1           \$7.4 million.

2                     Similarly, AWEC is also recommending the removal of the Utah demand-side  
3 management adjustment from the calculation of the load-based dynamic allocation  
4 factors. AWEC claims that this adjustment would reduce Oregon's revenue  
5 requirement by \$9.1 million.

6 **Q.   Please provide some background on the specific contract that is the subject of**  
7 **AWEC's proposed adjustment.**

8 A.   The Company entered into a contract where a new Utah large load customer brought  
9 new load and new offsetting renewable resources. The customer contract was entered  
10 into pursuant to Utah Schedule 34, which is a Utah program created by Utah Code  
11 section 54-17-806 that allows a qualifying customer to offset their load with  
12 renewable resources.

13 **Q.   How are the renewable resource generation and new customer load under Utah**  
14 **Schedule 34 treated for the purpose of calculating jurisdictional allocation**  
15 **factors?**

16 A.   For purposes of calculating jurisdictional allocation factors, the new renewable  
17 resource generation and new customer load under Utah Schedule 34 are treated on a  
18 net basis. Any costs that would arise from this agreement are situs assigned to Utah  
19 and have no impact on Oregon customers.

20                     When calculating jurisdictional allocation factors, there are two scenarios that  
21 could arise from Utah Schedule 34; either the customer load requirement is fully  
22 offset by the renewable generation, or the customer load requirement is greater than  
23 the renewable generation resource.

1 **Q. Please describe the scenario where Utah Schedule 34 customers' load**  
2 **requirement is fully offset by the renewable generation.**

3 A. As described above, the Company calculates jurisdictional allocation factors on a net  
4 basis, meaning the customer load is removed from jurisdictional allocation factors  
5 because the associated renewable generation sufficiently covered its load. Under this  
6 scenario there is no customer load under Utah Schedule 34 that is being served by the  
7 Company. Therefore, under 2020 Protocol, there is no load to be included for  
8 jurisdictional allocation purposes. At the same time, the Company removes from  
9 NPC all costs associated with the associated renewable generation, matching the costs  
10 and the benefits of this agreement. The result of this treatment is that Oregon  
11 customers are held harmless – they do not bear any cost associated with the Utah  
12 load, or any resources used to serve this load.

13 **Q. What happens when Utah Schedule 34 customers' load requirement is greater**  
14 **than the renewable generation resource?**

15 A. Under this scenario, the Utah Schedule 34 customer load exceeds the renewable  
16 generation. The Company would remove any load served by the renewable  
17 generation from jurisdictional allocation factors. Any remaining load that is now  
18 served by the PacifiCorp system is included in jurisdictional allocation factors. Like  
19 the first scenario, the Company continues to remove from NPC any costs associated  
20 with the corresponding renewable generation. The excess load served by the  
21 PacifiCorp system continues to remain in the total-company NPC with the Utah  
22 jurisdiction assuming a higher allocation of all costs due to the inclusion of the net  
23 load in jurisdictional allocation factors.

1 **Q. Does the Company agree with AWEC’s claim that Utah Schedule 34 contract is**  
2 **a “Special Contract”, as that term is defined in the 2020 Protocol, and therefore**  
3 **the customer load must be included as Utah load in the Load-Based Dynamic**  
4 **Allocation Factors?**

5 A. No. AWEC has misapplied the 2020 Protocol. Appendix A of the 2020 Protocol  
6 defines “Special Contract” as “a contract entered into between PacifiCorp and one of  
7 its retail customers with prices, terms, and conditions different from  
8 otherwise-applicable tariff rates. Special Contract may provide for a value  
9 consideration to the customer to reflect attributes of Customer Ancillary Service  
10 Contracts.”<sup>29</sup> A Utah Schedule 34 contract clearly does not meet the definition of a  
11 “Special Contract” as Utah Schedule 34 is an available service to qualifying  
12 customers provided for through PacifiCorp’s electric service tariffs for the state of  
13 Utah.

14 **Q. What provision of the 2020 Protocol is applicable to the implantation of**  
15 **State-Specific Initiatives?**

16 A. Section 5.8 of the 2020 Protocol, State-Specific Indicatives, states that the “[c]osts  
17 and benefits resulting from a state-specific initiative” are “allocated and assigned on a  
18 situs basis to the State adopting the initiative.”

19 **Q. Has AWEC made this same argument in front of other commissions?**

20 A. Yes. It is my understanding that AWEC made the same argument to the Idaho Public  
21 Utilities Commission (IPUC) in the Company’s most recent Energy Cost Adjustment  
22 Mechanism filing (IPUC Case No. PAC-E-22-05).

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<sup>29</sup> *In the Matter of the Application of PacifiCorp for an Investigation into Inter-Jurisdictional Issues*, Docket No. UM 1050, PAC/101, Appendix A at 7-8 (Dec. 3, 2019).

1 **Q. Did the IPUC accept AWEC's adjustment?**

2 A. No. The IPUC rejected AWEC's argument in Order 35419 on May 26, 2022.

3 **Q. AWEC recommends removal of the Utah demand-side management adjustment**  
4 **from the calculation of the Load-Based Dynamic Allocation. What is the basis**  
5 **for AWEC's recommendation?**

6 A. For purposes of allocation under the 2020 Protocol, the Company adjusted Utah's  
7 load to account for demand-side management programs. AWEC claims that this  
8 adjustment should be reversed because, according to AWEC, "The load forecast that  
9 PacifiCorp prepares already considers the specific customer use for the Utah DSM  
10 program, therefore an adjustment to the loads used to calculate Utah's dynamic  
11 load-based allocation factors is unnecessary."

12 **Q. Is AWEC's recommendation reasonable?**

13 A. AWEC's adjustment is based on an incorrect understanding of how the Company  
14 treats demand-side management programs under the 2020 Protocol. The adjustments  
15 proposed by the Company for calculating Load-Based Dynamic Allocation Factors  
16 are for Class 1 demand-side management (Demand Response) programs. When the  
17 Company produces its peak forecasts, historical Class 1 demand-side management is  
18 added into the historical jurisdictional peak loads to produce an uncurtailed peak  
19 forecast. Therefore, the Company then adjusts the peak forecast downward to account  
20 for the Class 1 demand-side management programs when calculating jurisdictional  
21 allocation factors, a treatment consistent with Section 3.1.2.1 of the 2020 Protocol, as  
22 AWEC concedes. AWEC's adjustment erroneously assumes that the initial peak  
23 forecast includes curtailed generation consistent with the Class 1 demand-side

1 management programs. Because AWEC has provided no evidence that the peak  
2 forecast incorrectly accounted for Utah demand-side management programs, its  
3 adjustment should be rejected.

4 **Q. Does AWEC provide additional arguments for purposes of their Utah DSM  
5 adjustment?**

6 A. AWEC makes two additional claims, Utah DSM programs provides no benefit to  
7 Oregon customers and the Company's forecast for these programs are overvalued in  
8 the coincident peak forecast.

9 **Q. How do you respond to AWECs claim that the Utah DSM program provides no  
10 benefit to Oregon customers and should be removed from Utah's jurisdictional  
11 load-based dynamic allocation factors?**

12 A. I disagree with this assertion. PacifiCorp operates as one system, and any load control  
13 program helps manage the resources available to serve all PacifiCorp customers.  
14 Furthermore, the Company's treatment of the Utah DSM program is consistent with  
15 Section 3.1.2.1 of the 2020 Protocol which states, "Costs associated with DSM  
16 Programs, including Class 1 DSM programs, will be allocated on a situs basis to the  
17 State in which the investment is made. Benefits from these programs, in form of  
18 reduced consumption and contribution to Coincident Peak, will be reflected in the  
19 Load-Based Dynamic Allocation Factors." This treatment has been used and  
20 approved by this Commission in the Company's last Oregon general rate case, docket  
21 UE 374.

1 **Q. Did the Company include other state DSM programs in the coincident peak**  
2 **forecast used in this general rate case?**

3 A. Yes. The Company also included a similar Class 1 DSM irrigation load control  
4 program in Idaho. AWEC took no issue with the Idaho DSM program.

5 **Q. AWEC suggests that the Utah DSM program benefits are overvalued as**  
6 **additional rationale supporting their proposed adjustment to remove Utah DSM**  
7 **programs from the coincident peaks forecast. How do you respond?**

8 A. AWEC largely uses the Utah Cool Keeper program to support this claim, however,  
9 AWEC has an incorrect understanding of the multiple DSM programs currently  
10 active or forecasted in Utah. On page 26 of Mr. Mullins' testimony, he states,  
11 "PacifiCorp assumes that over 250 MW of capacity can be provided by the [Cool  
12 Keeper] program..." which was provided by the Company in response to AWEC data  
13 request 063. AWEC data request 063 asked the Company to identify "All DSM"  
14 programs and was not specific to any particular program.

15 **Q. What are the various Utah DSM programs considered in the Company's**  
16 **coincident peak forecast?**

17 A. The Company included four different Utah DSM programs; Cool Keeper, Irrigation  
18 Load Control, Wattsmart Batteries, and a Commercial and Industrial Thermostat  
19 program. More importantly, the Company's July 2023 forecast for the Cool Keeper  
20 program was merely 118 MW, not the 250 MW as suggested by AWEC. It should be  
21 noted, the Company forecast this program from May to September, with July being  
22 the largest program month. As provided in AWEC data request 66, the Company  
23 executed the Cool Keeper program on July 12, 2020, for 32 minutes at 200 MW

1           before line losses, or an estimated 210 MW at the generator. This Commission should  
2           also reject this adjustment.

3   **Q.    Does this conclude your reply testimony?**

4   **A.    Yes it does.**

Docket No. UE 399  
Exhibit PAC/2001  
Witness: Sherona L. Cheung

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Sherona L. Cheung  
Revenue Requirement Summary

July 2022



**PacifiCorp**  
**OREGON**  
**Normalized Results of Operations - 2020 PROTOCOL**  
**Twelve Months Ending December 31, 2023**

	(1)	(2)	(3)	(4)	(5)	(6)
		(3) - (1)	Ref. Page 1.2			(3) + (4) + (5)
				<b>TAM</b>	<b>GRC</b>	
	NPC-Related Results	Non-NPC Related Results	Total Adjusted Results	NPC-Related Under Recovery	Requested Non-NPC Related Price Change	Total Normalized Results with Price Change
1 Operating Revenues:						
2 General Business Revenues	288,541,329	957,021,265	1,245,562,594	94,282,733	86,429,440	1,426,274,767
3 Interdepartmental	-	-	-	-	-	-
4 Special Sales	102,596,785	-	102,596,785	-	-	102,596,785
5 Other Operating Revenues	-	80,909,734	80,909,734	-	-	80,909,734
6 Total Operating Revenues	<u>391,138,114</u>	<u>1,037,930,999</u>	<u>1,429,069,113</u>	<u>94,282,733</u>	<u>86,429,440</u>	<u>1,609,781,286</u>
7						
8 Operating Expenses:						
9 Steam Production	166,383,477	84,817,187	251,200,664	-	-	251,200,664
10 Nuclear Production	-	-	-	-	-	-
11 Hydro Production	-	12,195,411	12,195,411	-	-	12,195,411
12 Other Power Supply	348,730,427	19,245,209	367,975,636	-	-	367,975,636
13 Transmission	40,311,763	19,273,747	59,585,511	-	-	59,585,511
14 Distribution	-	116,474,578	116,474,578	-	-	116,474,578
15 Customer Accounting	-	23,650,478	23,650,478	-	912,087	24,562,565
16 Customer Service & Info	-	4,692,219	4,692,219	-	-	4,692,219
17 Sales	-	-	-	-	-	-
18 Administrative & General	-	63,204,272	63,204,272	-	-	63,204,272
19						
20 Total O&M Expenses	<u>555,425,668</u>	<u>343,553,102</u>	<u>898,978,769</u>	<u>-</u>	<u>912,087</u>	<u>899,890,856</u>
21						
22 Depreciation	-	287,295,417	287,295,417	-	-	287,295,417
23 Amortization	-	34,357,204	34,357,204	-	-	34,357,204
24 Taxes Other Than Income	-	89,848,715	89,848,715	-	5,164,621	95,013,336
25 Income Taxes - Federal	(85,727,084)	16,683,539	(69,043,545)	18,900,482	16,107,991	(34,035,072)
26 Income Taxes - State	(7,458,655)	4,035,551	(3,423,104)	4,280,436	3,648,014	4,505,346
27 Income Taxes - Def Net	-	14,587,854	14,587,854	-	-	14,587,854
28 Investment Tax Credit Adj.	-	-	-	-	-	-
29 Misc Revenue & Expense	-	4,502	4,502	-	-	4,502
30						
31 Total Operating Expenses:	<u>462,239,929</u>	<u>790,365,884</u>	<u>1,252,605,813</u>	<u>23,180,918</u>	<u>25,832,712</u>	<u>1,301,619,444</u>
32						
33 Operating Rev For Return:	<u>(71,101,815)</u>	<u>247,565,115</u>	<u>176,463,300</u>	<u>71,101,815</u>	<u>60,596,728</u>	<u>308,161,842</u>
34						
35 Rate Base:						
36 Electric Plant In Service	-	8,832,858,186	8,832,858,186	-	-	8,832,858,186
37 Plant Held for Future Use	-	-	-	-	-	-
38 Misc Deferred Debits	-	67,039,001	67,039,001	-	-	67,039,001
39 Elec Plant Acq Adj	-	699,759	699,759	-	-	699,759
40 Pension	-	-	-	-	-	-
41 Prepayments	-	11,116,576	11,116,576	-	-	11,116,576
42 Fuel Stock	-	37,219,586	37,219,586	-	-	37,219,586
43 Material & Supplies	-	81,632,777	81,632,777	-	-	81,632,777
44 Working Capital	-	13,614,617	13,614,617	-	-	13,614,617
45 Weatherization Loans	-	-	-	-	-	-
46 Misc Rate Base	-	(101,493)	(101,493)	-	-	(101,493)
47						
48 Total Electric Plant:	<u>-</u>	<u>9,044,079,009</u>	<u>9,044,079,009</u>	<u>-</u>	<u>-</u>	<u>9,044,079,009</u>
49						
50 Rate Base Deductions:						
51 Accum Prov For Deprec	-	(3,565,614,879)	(3,565,614,879)	-	-	(3,565,614,879)
52 Accum Prov For Amort	-	(217,778,883)	(217,778,883)	-	-	(217,778,883)
53 Accum Def Income Tax	-	(643,328,592)	(643,328,592)	-	-	(643,328,592)
54 Unamortized ITC	-	(45,658)	(45,658)	-	-	(45,658)
55 Customer Adv For Const	-	(22,975,394)	(22,975,394)	-	-	(22,975,394)
56 Customer Service Deposits	-	-	-	-	-	-
57 Misc Rate Base Deductions	-	(414,776,627)	(414,776,627)	-	-	(414,776,627)
58						
59 Total Rate Base Deductions	<u>-</u>	<u>(4,864,520,032)</u>	<u>(4,864,520,032)</u>	<u>-</u>	<u>-</u>	<u>(4,864,520,032)</u>
60						
61 Total Rate Base:	<u>-</u>	<u>4,179,558,977</u>	<u>4,179,558,977</u>	<u>-</u>	<u>-</u>	<u>4,179,558,977</u>
62						
63 Return on Rate Base			4.222%			7.373%
64						
65 Return on Equity			3.769%			9.800%

PacifiCorp  
OREGON

Page 1.1

Normalized Results of Operations - 2020 PROTOCOL  
Twelve Months Ending December 31, 2023

GENERAL RATE CASE RESULTS

	(1)	(2)	(3) (1) + (2)
	Total Adjusted Results	GRC Price Change	Total Normalized Results with Price Change
1 Operating Revenues:			
2 General Business Revenues	957,021,265	86,429,440	1,043,450,705
3 Interdepartmental	-		-
4 Special Sales	-		-
5 Other Operating Revenues	80,909,734		80,909,734
6 Total Operating Revenues	1,037,930,999	86,429,440	1,124,360,439
7			
8 Operating Expenses:			
9 Steam Production	84,817,187		84,817,187
10 Nuclear Production	-		-
11 Hydro Production	12,195,411		12,195,411
12 Other Power Supply	19,245,209		19,245,209
13 Transmission	19,273,747		19,273,747
14 Distribution	116,474,578		116,474,578
15 Customer Accounting	23,650,478	912,087	24,562,565
16 Customer Service & Info	4,692,219		4,692,219
17 Sales	-		-
18 Administrative & General	63,204,272		63,204,272
19			
20 Total O&M Expenses	343,553,102	912,087	344,465,188
21			
22 Depreciation	287,295,417		287,295,417
23 Amortization	34,357,204		34,357,204
24 Taxes Other Than Income	89,848,715	5,164,621	95,013,336
25 Income Taxes - Federal	16,683,539	16,107,991	32,791,530
26 Income Taxes - State	4,035,551	3,648,014	7,683,565
27 Income Taxes - Def Net	14,587,854		14,587,854
28 Investment Tax Credit Adj.	-		-
29 Misc Revenue & Expense	4,502		4,502
30			
31 Total Operating Expenses:	790,365,884	25,832,712	816,198,596
32			
33 Operating Rev For Return:	247,565,115	60,596,728	308,161,842
34			
35 Rate Base:			
36 Electric Plant In Service	8,832,858,186		8,832,858,186
37 Plant Held for Future Use	-		-
38 Misc Deferred Debits	67,039,001		67,039,001
39 Elec Plant Acq Adj	699,759		699,759
40 Pension	-		-
41 Prepayments	11,116,576		11,116,576
42 Fuel Stock	37,219,586		37,219,586
43 Material & Supplies	81,632,777		81,632,777
44 Working Capital	13,614,617		13,614,617
45 Weatherization Loans	-		-
46 Misc Rate Base	(101,493)		(101,493)
47			
48 Total Electric Plant:	9,044,079,009		9,044,079,009
49			
50 Rate Base Deductions:			
51 Accum Prov For Deprec	(3,565,614,879)		(3,565,614,879)
52 Accum Prov For Amort	(217,778,883)		(217,778,883)
53 Accum Def Income Tax	(643,328,592)		(643,328,592)
54 Unamortized ITC	(45,658)		(45,658)
55 Customer Adv For Const	(22,975,394)		(22,975,394)
56 Customer Service Deposits	-		-
57 Misc Rate Base Deductions	(414,776,627)		(414,776,627)
58			
59 Total Rate Base Deductions	(4,864,520,032)		(4,864,520,032)
60			
61 Total Rate Base:	4,179,558,977		4,179,558,977
62			
63 Return on Rate Base	5.923%		7.373%
64			
65 Return on Equity	7.025%		9.800%
66			
67 TAX CALCULATION:			
68 Operating Revenue	282,872,059	80,352,733	363,224,791
69 Other Deductions			
70 Interest (AFUDC)	(21,314,425)	-	(21,314,425)
71 Interest	94,119,313	-	94,119,313
72 Schedule "M" Additions	325,051,640	-	325,051,640
73 Schedule "M" Deductions	451,617,664	-	451,617,664
74 Income Before Tax	83,501,147	80,352,733	163,853,879
75			
76 State Income Taxes	4,035,551	3,648,014	7,683,565
77 Taxable Income	79,465,596	76,704,719	156,170,314
78			
79 Federal Income Taxes + Other	16,683,539	16,107,991	32,791,530

PacifiCorp  
OREGON

Page 1.2

Normalized Results of Operations - 2020 PROTOCOL  
Twelve Months Ending December 31, 2023

## TRANSITION ADJUSTMENT MECHANISM RESULTS

	(1)	(2)	(3) (1) + (2)
	Total Adjusted Results	TAM Price Change	Total Normalized Results with Price Change
1 Operating Revenues:			
2 General Business Revenues	288,541,329	94,282,733	382,824,062
3 Interdepartmental	-	-	-
4 Special Sales	102,596,785	-	102,596,785
5 Other Operating Revenues	-	-	-
6 Total Operating Revenues	391,138,114	94,282,733	485,420,847
7			
8 Operating Expenses:			
9 Steam Production	166,383,477	-	166,383,477
10 Nuclear Production	-	-	-
11 Hydro Production	-	-	-
12 Other Power Supply	348,730,427	-	348,730,427
13 Transmission	40,311,763	-	40,311,763
14 Distribution	-	-	-
15 Customer Accounting	-	-	-
16 Customer Service & Info	-	-	-
17 Sales	-	-	-
18 Administrative & General	-	-	-
19			
20 Total O&M Expenses	555,425,668	-	555,425,668
21			
22 Depreciation	-	-	-
23 Amortization	-	-	-
24 Taxes Other Than Income	-	-	-
25 Income Taxes - Federal	(85,727,084)	18,900,482	(66,826,602)
26 Income Taxes - State	(7,458,655)	4,280,436	(3,178,219)
27 Income Taxes - Def Net	-	-	-
28 Investment Tax Credit Adj.	-	-	-
29 Misc Revenue & Expense	-	-	-
30			
31 Total Operating Expenses:	462,239,929	23,180,918	485,420,847
32			
33 Operating Rev For Return:	(71,101,815)	71,101,815	-
34			
35 Rate Base:			
36 Electric Plant In Service	-	-	-
37 Plant Held for Future Use	-	-	-
38 Misc Deferred Debits	-	-	-
39 Elec Plant Acq Adj	-	-	-
40 Pension	-	-	-
41 Prepayments	-	-	-
42 Fuel Stock	-	-	-
43 Material & Supplies	-	-	-
44 Working Capital	-	-	-
45 Weatherization Loans	-	-	-
46 Misc Rate Base	-	-	-
47			
48 Total Electric Plant:	-	-	-
49			
50 Rate Base Deductions:			
51 Accum Prov For Deprec	-	-	-
52 Accum Prov For Amort	-	-	-
53 Accum Def Income Tax	-	-	-
54 Unamortized ITC	-	-	-
55 Customer Adv For Const	-	-	-
56 Customer Service Deposits	-	-	-
57 Misc Rate Base Deductions	-	-	-
58			
59 Total Rate Base Deductions	-	-	-
60			
61 Total Rate Base:	-	-	-
62			
63 Return on Rate Base	N/A	-	N/A
64			
65 Return on Equity	N/A	-	N/A
66			
67 TAX CALCULATION:			
68 Operating Revenue	(164,287,554)	94,282,733	(70,004,820)
69 Other Deductions	-	-	-
70 Interest (AFUDC)	-	-	-
71 Interest	-	-	-
72 Schedule "M" Additions	-	-	-
73 Schedule "M" Deductions	-	-	-
74 Income Before Tax	(164,287,554)	94,282,733	(70,004,820)
75			
76 State Income Taxes	(7,458,655)	4,280,436	(3,178,219)
77 Taxable Income	(156,828,899)	90,002,297	(66,826,602)
78			
79 Federal Income Taxes + Other	(85,727,084)	18,900,482	(66,826,602)

**PacifiCorp**  
**OREGON**  
**Normalized Results of Operations - 2020 PROTOCOL**  
**Twelve Months Ending December 31, 2023**

	(1) Total Adjusted Results	(2) Price Change	(3) Results with Price Change
1 Operating Revenues:			
2 General Business Revenues	1,245,562,594	180,712,173	1,426,274,767
3 Interdepartmental	-		
4 Special Sales	102,596,785		
5 Other Operating Revenues	80,909,734		
6 Total Operating Revenues	<u>1,429,069,113</u>		
7			
8 Operating Expenses:			
9 Steam Production	251,200,664		
10 Nuclear Production	-		
11 Hydro Production	12,195,411		
12 Other Power Supply	367,975,636		
13 Transmission	59,585,511		
14 Distribution	116,474,578		
15 Customer Accounting	23,650,478	912,087	24,562,565
16 Customer Service & Info	4,692,219		
17 Sales	-		
18 Administrative & General	63,204,272		
19			
20 Total O&M Expenses	898,978,769		
21			
22 Depreciation	287,295,417		
23 Amortization	34,357,204		
24 Taxes Other Than Income	89,848,715	5,164,621	95,013,336
25 Income Taxes - Federal	(69,043,545)	35,008,473	(34,035,072)
26 Income Taxes - State	(3,423,104)	7,928,450	4,505,346
27 Income Taxes - Def Net	14,587,854		
28 Investment Tax Credit Adj.	-		
29 Misc Revenue & Expense	4,502		
30			
31 Total Operating Expenses:	1,252,605,813	49,013,631	1,301,619,444
32			
33 Operating Rev For Return:	<u>176,463,300</u>	<u>131,698,542</u>	<u>308,161,842</u>
34			
35 Rate Base:			
36 Electric Plant In Service	8,832,858,186		
37 Plant Held for Future Use	-		
38 Misc Deferred Debits	67,039,001		
39 Elec Plant Acq Adj	699,759		
40 Pensions	-		
41 Prepayments	11,116,576		
42 Fuel Stock	37,219,586		
43 Material & Supplies	81,632,777		
44 Working Capital	13,614,617		
45 Weatherization Loans	-		
46 Misc Rate Base	(101,493)		
47			
48 Total Electric Plant:	9,044,079,009	-	9,044,079,009
49			
50 Rate Base Deductions:			
51 Accum Prov For Deprec	(3,565,614,879)		
52 Accum Prov For Amort	(217,778,883)		
53 Accum Def Income Tax	(643,328,592)		
54 Unamortized ITC	(45,658)		
55 Customer Adv For Const	(22,975,394)		
56 Customer Service Deposits	-		
57 Misc Rate Base Deductions	(414,776,627)		
58			
59 Total Rate Base Deductions	(4,864,520,032)	-	(4,864,520,032)
60			
61 Total Rate Base:	<u>4,179,558,977</u>	<u>-</u>	<u>4,179,558,977</u>
62			
63 Return on Rate Base	4.222%		7.373%
64			
65 Return on Equity	3.769%		9.800%
66			
67 TAX CALCULATION:			
68 Operating Revenue	118,584,505	174,635,466	293,219,971
69 Other Deductions			
70 Interest (AFUDC)	(21,314,425)	-	(21,314,425)
71 Interest	94,119,313	-	94,119,313
72 Schedule "M" Additions	325,051,640	-	325,051,640
73 Schedule "M" Deductions	451,617,664	-	451,617,664
74 Income Before Tax	(80,786,407)	174,635,466	93,849,059
75			
76 State Income Taxes	(3,423,104)	7,928,450	4,505,346
77 Taxable Income	<u>(77,363,303)</u>	<u>166,707,016</u>	<u>89,343,713</u>
78			
79 Federal Income Taxes + Other	<u>(69,043,545)</u>	<u>35,008,473</u>	<u>(34,035,072)</u>

**Pacificorp**  
**Oregon General Rate Case**  
**Adjustment Summary**  
**Twelve Months Ending December 31, 2023**

	Exhibit PAC/2002		Exhibit PAC/2002			
	TOTAL COMPANY UNADJUSTED RESULTS JUNE 2021	OREGON ALLOCATED UNADJUSTED RESULTS JUNE 2021	Tab 3 Revenue Adjustments	Tab 4 O&M Adjustments	Tab 5 Net Power Cost Adjustments	Tab 6 Depreciation & Amortization Adjustments
1 Operating Revenues:						
2 General Business Revenues	5,081,632,249	1,308,339,123	(64,543,148)	1,766,619	-	-
3 Interdepartmental	-	-	-	-	-	-
4 Special Sales	212,315,668	52,011,190	-	-	50,585,595	-
5 Other Operating Revenues	227,962,549	74,106,867	4,692,224	-	-	-
6 Total Operating Revenues	5,521,910,467	1,434,457,180	(59,850,924)	1,766,619	50,585,595	-
7						
8 Operating Expenses:						
9 Steam Production	997,145,306	255,077,987	-	6,978,517	(1,460,911)	3,613,145
10 Nuclear Production	-	-	-	-	-	-
11 Hydro Production	76,270,911	19,831,780	-	(7,636,369)	-	-
12 Other Power Supply	1,076,832,156	265,666,668	-	3,243,585	99,362,079	-
13 Transmission	220,828,048	57,246,429	-	692,526	1,646,555	-
14 Distribution	227,788,851	88,583,363	-	27,891,214	-	-
15 Customer Accounting	70,180,739	22,022,443	-	1,628,035	-	-
16 Customer Service & Info	116,029,408	5,610,498	-	343,920	-	-
17 Sales	-	-	-	-	-	-
18 Administrative & General	296,924,361	86,785,274	-	(22,636,322)	-	-
19						
20 Total O&M Expenses	3,081,999,779	800,824,443	-	10,505,107	99,547,723	3,613,145
21						
22 Depreciation	1,035,081,277	232,134,017	-	-	-	58,358,262
23 Amortization	61,823,778	16,281,354	-	-	-	24,556,791
24 Taxes Other Than Income	212,196,714	79,011,374	-	(1,555,006)	-	-
25 Income Taxes - Federal	(36,629,750)	6,600,112	(11,997,447)	425,610	(9,818,976)	(13,638,561)
26 Income Taxes - State	24,994,902	8,911,646	(2,717,090)	96,389	(2,223,726)	(3,088,756)
27 Income Taxes - Def Net	(64,900,993)	(21,537,286)	-	(2,473,765)	-	(253,869)
28 Investment Tax Credit Adj.	(1,703,368)	-	-	-	-	-
29 Misc Revenue & Expense	(1,733,836)	(98,098)	-	102,600	-	-
30						
31 Total Operating Expenses:	4,311,128,503	1,122,127,562	(14,714,537)	7,100,936	87,505,021	69,547,012
32						
33 Operating Rev For Return:	1,210,781,963	312,329,618	(45,136,387)	(5,334,317)	(36,919,426)	(69,547,012)
34						
35 Rate Base:						
36 Electric Plant In Service	31,317,729,025	8,552,036,959	-	-	-	-
37 Plant Held for Future Use	23,896,248	9,650,600	-	-	-	-
38 Misc Deferred Debits	962,744,647	193,185,982	-	-	-	-
39 Elec Plant Acq Adj	14,875,820	1,748,416	-	-	-	-
40 Pensions	28,656,862	7,773,234	-	-	-	-
41 Prepayments	67,554,352	11,116,576	-	-	-	-
42 Fuel Stock	201,471,836	50,207,063	-	-	-	-
43 Material & Supplies	273,026,865	83,021,764	-	-	-	-
44 Working Capital	46,257,939	13,952,625	(139,082)	89,530	827,098	(123,955)
45 Weatherization Loans	199,224,237	-	-	-	-	-
46 Misc Rate Base	-	-	-	-	-	-
47						
48 Total Electric Plant:	33,135,437,831	8,922,693,219	(139,082)	89,530	827,098	(123,955)
49						
50 Rate Base Deductions:						
51 Accum Prov For Deprec	(9,626,761,743)	(2,811,129,532)	-	-	-	(750,859,439)
52 Accum Prov For Amort	(691,673,798)	(201,224,878)	-	-	-	(16,554,005)
53 Accum Def Income Tax	(2,565,819,019)	(623,397,645)	-	(9,413,907)	-	(602,826)
54 Unamortized ITC	(2,245,487)	(50,219)	-	-	-	-
55 Customer Adv For Const	(104,109,027)	(28,049,700)	-	-	-	-
56 Customer Service Deposits	-	-	-	-	-	-
57 Misc Rate Base Deductions	(2,269,895,491)	(489,521,399)	-	38,288,770	-	(7,266,788)
58						
59 Total Rate Base Deductions	(15,260,504,564)	(4,153,373,373)	-	28,874,864	-	(775,283,057)
60						
61 Total Rate Base:	17,874,933,268	4,769,319,847	(139,082)	28,964,394	827,098	(775,407,012)
62						
63 Return on Rate Base		6.549%	-0.946%	-0.145%	-0.770%	-0.825%
64						
65 Return on Equity		8.222%	-1.811%	-0.278%	-1.474%	-1.579%
66						
67 TAX CALCULATION:						
68 Operating Revenue		306,304,090	(59,850,924)	(7,286,082)	(48,962,128)	(86,528,198)
69 Other Deductions						
70 Interest (AFUDC)		(20,225,807)	-	-	-	-
71 Interest		107,400,113	(3,132)	652,248	18,625	(17,461,358)
72 Schedule "M" Additions		405,703,893	-	10,061,436	-	1,032,557
73 Schedule "M" Deductions		428,541,915	-	-	-	-
74 Income Before Tax		196,291,762	(59,847,792)	2,123,106	(48,980,754)	(68,034,283)
75						
76 State Income Taxes		8,911,646	(2,717,090)	96,389	(2,223,726)	(3,088,756)
77 Taxable Income		187,380,116	(57,130,702)	2,026,717	(46,757,027)	(64,945,526)
78						
79 Federal Income Taxes + Other		6,600,112	(11,997,447)	425,610	(9,818,976)	(13,638,561)
APPROXIMATE PRICE CHANGE		53,918,354	61,914,993	10,284,735	50,743,235	16,981,512

**Pacificorp**  
**Oregon General Rate Case**  
**Adjustment Summary**  
**Twelve Months Ending December 31, 2023**

Exhibit PAC/2002				
	Tab 7	Tab 8	REPLY	OR Allocated
	Tax Adjustments	Rate Base Adjustments	Reply Adjustments NEW	Results of Operations December 2023
1 Operating Revenues:				
2 General Business Revenues	-	-	-	1,245,562,594
3 Interdepartmental	-	-	-	-
4 Special Sales	-	-	-	102,596,785
5 Other Operating Revenues	-	2,110,642	-	80,909,734
6 Total Operating Revenues	-	2,110,642	-	1,429,069,113
7				
8 Operating Expenses:				
9 Steam Production	-	(13,008,075)	-	251,200,664
10 Nuclear Production	-	-	-	-
11 Hydro Production	-	-	-	12,195,411
12 Other Power Supply	-	(296,695)	-	367,975,636
13 Transmission	-	-	-	59,585,511
14 Distribution	-	-	-	116,474,578
15 Customer Accounting	-	-	-	23,650,478
16 Customer Service & Info	-	-	(1,262,199)	4,692,219
17 Sales	-	-	-	-
18 Administrative & General	-	(981,960)	37,280	63,204,272
19				
20 Total O&M Expenses	-	(14,286,730)	(1,224,919)	898,978,769
21				
22 Depreciation	-	(3,084,897)	(111,966)	287,295,417
23 Amortization	-	(5,513,344)	(967,597)	34,357,204
24 Taxes Other Than Income	12,093,289	299,058	-	89,848,715
25 Income Taxes - Federal	(46,690,936)	5,583,516	493,136	(69,043,545)
26 Income Taxes - State	(5,777,760)	1,264,512	111,682	(3,423,104)
27 Income Taxes - Def Net	40,658,443	(1,790,335)	(15,334)	14,587,854
28 Investment Tax Credit Adj.	-	-	-	-
29 Misc Revenue & Expense	-	-	-	4,502
30				
31 Total Operating Expenses:	283,037	(17,528,220)	(1,714,998)	1,252,605,813
32				
33 Operating Rev For Return:	(283,037)	19,638,863	1,714,998	176,463,300
34				
35 Rate Base:				
36 Electric Plant In Service	-	284,999,713	(4,178,486)	8,832,858,186
37 Plant Held for Future Use	-	(9,650,600)	-	-
38 Misc Deferred Debits	-	(126,146,982)	-	67,039,001
39 Elec Plant Acq Adj	-	(1,048,657)	-	699,759
40 Pensions	-	(7,773,234)	-	-
41 Prepayments	-	-	-	11,116,576
42 Fuel Stock	-	(12,987,477)	-	37,219,586
43 Material & Supplies	-	(1,388,987)	-	81,632,777
44 Working Capital	(381,628)	(604,109)	(5,861)	13,614,617
45 Weatherization Loans	-	-	-	-
46 Misc Rate Base	-	-	(101,493)	(101,493)
47				
48 Total Electric Plant:	(381,628)	125,399,667	(4,285,840)	9,044,079,009
49				
50 Rate Base Deductions:				
51 Accum Prov For Deprec	-	(3,734,651)	108,742	(3,565,614,879)
52 Accum Prov For Amort	-	-	-	(217,778,883)
53 Accum Def Income Tax	(50,268,963)	40,313,480	41,268	(643,328,592)
54 Unamortized ITC	4,561	-	-	(45,658)
55 Customer Adv For Const	-	5,074,306	-	(22,975,394)
56 Customer Service Deposits	-	-	-	-
57 Misc Rate Base Deductions	27,572,240	16,150,550	-	(414,776,627)
58				
59 Total Rate Base Deductions	(22,692,161)	57,803,685	150,010	(4,864,520,032)
60				
61 Total Rate Base:	(23,073,790)	183,203,352	(4,135,830)	4,179,558,977
62				
63 Return on Rate Base	0.015%	0.300%	0.045%	4.222%
64				
65 Return on Equity	0.029%	0.573%	0.086%	3.769%
66				
67 TAX CALCULATION:				
68 Operating Revenue	(12,093,289)	24,696,555	2,304,482	118,584,505
69 Other Deductions	-	-	-	-
70 Interest (AFUDC)	(1,088,618)	-	-	(21,314,425)
71 Interest	(519,598)	4,125,549	(93,135)	94,119,313
72 Schedule "M" Additions	(93,815,684)	2,178,179	(108,742)	325,051,640
73 Schedule "M" Deductions	28,350,317	(5,103,496)	(171,072)	451,617,664
74 Income Before Tax	(132,651,075)	27,852,681	2,459,947	(80,786,407)
75				
76 State Income Taxes	(5,777,760)	1,264,512	111,682	(3,423,104)
77 Taxable Income	(126,873,315)	26,588,170	2,348,265	(77,363,303)
78				
79 Federal Income Taxes + Other	(46,690,936)	5,583,516	493,136	(69,043,545)
APPROXIMATE PRICE CHANGE	(1,946,019)	(8,412,951)	(2,771,686)	180,712,173

Docket No. UE 399  
Exhibit PAC/2002  
Witness: Sherona L. Cheung

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Sherona L. Cheung

Oregon Results of Operations – December 2023

July 2022

## Tab 1 - Results



**PacifiCorp**  
**OREGON**  
**Normalized Results of Operations - 2020 PROTOCOL**  
**Twelve Months Ending December 31, 2023**

(1) Test Period 2020 Protocol Revenue Requirement	1,426,274,767	Page 1.1
(2) Normalized General Business Revenues	1,245,562,594	Page 1.1
(3) 2020 Protocol Price Change	<u>180,712,173</u>	Page 1.1

**PacifiCorp**  
**OREGON**  
**Normalized Results of Operations - 2020 PROTOCOL**  
**Twelve Months Ending December 31, 2023**

	(1)	(2)	(3)	(4)	(5)	(6)
		(3) - (1)	Ref. Page 1.2			(3) + (4) + (5)
	NPC-Related Results	Non-NPC Related Results	Total Adjusted Results	TAM NPC-Related Under Recovery	GRC Requested Non-NPC Related Price Change	Total Normalized Results with Price Change
1 Operating Revenues:						
2 General Business Revenues	288,541,329	957,021,265	1,245,562,594	94,282,733	86,429,440	1,426,274,767
3 Interdepartmental	-	-	-	-	-	-
4 Special Sales	102,596,785	-	102,596,785	-	-	102,596,785
5 Other Operating Revenues	-	80,909,734	80,909,734	-	-	80,909,734
6 Total Operating Revenues	<u>391,138,114</u>	<u>1,037,930,999</u>	<u>1,429,069,113</u>	<u>94,282,733</u>	<u>86,429,440</u>	<u>1,609,781,286</u>
7						
8 Operating Expenses:						
9 Steam Production	166,383,477	84,817,187	251,200,664	-	-	251,200,664
10 Nuclear Production	-	-	-	-	-	-
11 Hydro Production	-	12,195,411	12,195,411	-	-	12,195,411
12 Other Power Supply	348,730,427	19,245,209	367,975,636	-	-	367,975,636
13 Transmission	40,311,763	19,273,747	59,585,511	-	-	59,585,511
14 Distribution	-	116,474,578	116,474,578	-	-	116,474,578
15 Customer Accounting	-	23,650,478	23,650,478	-	912,087	24,562,565
16 Customer Service & Info	-	4,692,219	4,692,219	-	-	4,692,219
17 Sales	-	-	-	-	-	-
18 Administrative & General	-	63,204,272	63,204,272	-	-	63,204,272
19						
20 Total O&M Expenses	<u>555,425,668</u>	<u>343,553,102</u>	<u>898,978,769</u>	<u>-</u>	<u>912,087</u>	<u>899,890,856</u>
21						
22 Depreciation	-	287,295,417	287,295,417	-	-	287,295,417
23 Amortization	-	34,357,204	34,357,204	-	-	34,357,204
24 Taxes Other Than Income	-	89,848,715	89,848,715	-	5,164,621	95,013,336
25 Income Taxes - Federal	(85,727,084)	16,683,539	(69,043,545)	18,900,482	16,107,991	(34,035,072)
26 Income Taxes - State	(7,458,655)	4,035,551	(3,423,104)	4,280,436	3,648,014	4,505,346
27 Income Taxes - Def Net	-	14,587,854	14,587,854	-	-	14,587,854
28 Investment Tax Credit Adj.	-	-	-	-	-	-
29 Misc Revenue & Expense	-	4,502	4,502	-	-	4,502
30						
31 Total Operating Expenses:	<u>462,239,929</u>	<u>790,365,884</u>	<u>1,252,605,813</u>	<u>23,180,918</u>	<u>25,832,712</u>	<u>1,301,619,444</u>
32						
33 Operating Rev For Return:	<u>(71,101,815)</u>	<u>247,565,115</u>	<u>176,463,300</u>	<u>71,101,815</u>	<u>60,596,728</u>	<u>308,161,842</u>
34						
35 Rate Base:						
36 Electric Plant In Service	-	8,832,858,186	8,832,858,186	-	-	8,832,858,186
37 Plant Held for Future Use	-	-	-	-	-	-
38 Misc. Deferred Debits	-	67,039,001	67,039,001	-	-	67,039,001
39 Elec Plant Acq Adj	-	699,759	699,759	-	-	699,759
40 Pension	-	-	-	-	-	-
41 Prepayments	-	11,116,576	11,116,576	-	-	11,116,576
42 Fuel Stock	-	37,219,586	37,219,586	-	-	37,219,586
43 Material & Supplies	-	81,632,777	81,632,777	-	-	81,632,777
44 Working Capital	-	13,614,617	13,614,617	-	-	13,614,617
45 Weatherization Loans	-	-	-	-	-	-
46 Misc Rate Base	-	(101,493)	(101,493)	-	-	(101,493)
47						
48 Total Electric Plant:	<u>-</u>	<u>9,044,079,009</u>	<u>9,044,079,009</u>	<u>-</u>	<u>-</u>	<u>9,044,079,009</u>
49						
50 Rate Base Deductions:						
51 Accum Prov For Deprec	-	(3,565,614,879)	(3,565,614,879)	-	-	(3,565,614,879)
52 Accum Prov For Amort	-	(217,778,883)	(217,778,883)	-	-	(217,778,883)
53 Accum Def Income Tax	-	(643,328,592)	(643,328,592)	-	-	(643,328,592)
54 Unamortized ITC	-	(45,658)	(45,658)	-	-	(45,658)
55 Customer Adv For Const	-	(22,975,394)	(22,975,394)	-	-	(22,975,394)
56 Customer Service Deposits	-	-	-	-	-	-
57 Misc Rate Base Deductions	-	(414,776,627)	(414,776,627)	-	-	(414,776,627)
58						
59 Total Rate Base Deductions	<u>-</u>	<u>(4,864,520,032)</u>	<u>(4,864,520,032)</u>	<u>-</u>	<u>-</u>	<u>(4,864,520,032)</u>
60						
61 Total Rate Base:	<u>-</u>	<u>4,179,558,977</u>	<u>4,179,558,977</u>	<u>-</u>	<u>-</u>	<u>4,179,558,977</u>
62						
63 Return on Rate Base			4.222%			7.373%
64						
65 Return on Equity			3.769%			9.800%

**PacifiCorp**  
**OREGON**  
**Normalized Results of Operations - 2020 PROTOCOL**  
**Twelve Months Ending December 31, 2023**

**GENERAL RATE CASE RESULTS**

	(1)	(2)	(3) (1) + (2)
	Total Adjusted Results	GRC Price Change	Total Normalized Results with Price Change
1 Operating Revenues:			
2 General Business Revenues	957,021,265	86,429,440	1,043,450,705
3 Interdepartmental	-		-
4 Special Sales	-		-
5 Other Operating Revenues	80,909,734		80,909,734
6 Total Operating Revenues	<u>1,037,930,999</u>	<u>86,429,440</u>	<u>1,124,360,439</u>
7			
8 Operating Expenses:			
9 Steam Production	84,817,187		84,817,187
10 Nuclear Production	-		-
11 Hydro Production	12,195,411		12,195,411
12 Other Power Supply	19,245,209		19,245,209
13 Transmission	19,273,747		19,273,747
14 Distribution	116,474,578		116,474,578
15 Customer Accounting	23,650,478	912,087	24,562,565
16 Customer Service & Info	4,692,219		4,692,219
17 Sales	-		-
18 Administrative & General	63,204,272		63,204,272
19			
20 Total O&M Expenses	343,553,102	912,087	344,465,188
21			
22 Depreciation	287,295,417		287,295,417
23 Amortization	34,357,204		34,357,204
24 Taxes Other Than Income	89,848,715	5,164,621	95,013,336
25 Income Taxes - Federal	16,683,539	16,107,991	32,791,530
26 Income Taxes - State	4,035,551	3,648,014	7,683,565
27 Income Taxes - Def Net	14,587,854		14,587,854
28 Investment Tax Credit Adj.	-		-
29 Misc Revenue & Expense	4,502		4,502
30			
31 Total Operating Expenses:	790,365,884	25,832,712	816,198,596
32			
33 Operating Rev For Return:	<u>247,565,115</u>	<u>60,596,728</u>	<u>308,161,842</u>
34			
35 Rate Base:			
36 Electric Plant In Service	8,832,858,186		8,832,858,186
37 Plant Held for Future Use	-		-
38 Misc Deferred Debits	67,039,001		67,039,001
39 Elec Plant Acq Adj	699,759		699,759
40 Pension	-		-
41 Prepayments	11,116,576		11,116,576
42 Fuel Stock	37,219,586		37,219,586
43 Material & Supplies	81,632,777		81,632,777
44 Working Capital	13,614,617		13,614,617
45 Weatherization Loans	-		-
46 Misc Rate Base	(101,493)		(101,493)
47			
48 Total Electric Plant:	9,044,079,009		9,044,079,009
49			
50 Rate Base Deductions:			
51 Accum Prov For Deprec	(3,565,614,879)		(3,565,614,879)
52 Accum Prov For Amort	(217,778,883)		(217,778,883)
53 Accum Def Income Tax	(643,328,592)		(643,328,592)
54 Unamortized ITC	(45,658)		(45,658)
55 Customer Adv For Const	(22,975,394)		(22,975,394)
56 Customer Service Deposits	-		-
57 Misc Rate Base Deductions	(414,776,627)		(414,776,627)
58			
59 Total Rate Base Deductions	(4,864,520,032)		(4,864,520,032)
60			
61 Total Rate Base:	<u>4,179,558,977</u>		<u>4,179,558,977</u>
62			
63 Return on Rate Base	5.923%		7.373%
64			
65 Return on Equity	7.025%		9.800%
66			
67 TAX CALCULATION:			
68 Operating Revenue	282,872,059	80,352,733	363,224,791
69 Other Deductions			
70 Interest (AFUDC)	(21,314,425)	-	(21,314,425)
71 Interest	94,119,313	-	94,119,313
72 Schedule "M" Additions	325,051,640	-	325,051,640
73 Schedule "M" Deductions	451,617,664	-	451,617,664
74 Income Before Tax	83,501,147	80,352,733	163,853,879
75			
76 State Income Taxes	4,035,551	3,648,014	7,683,565
77 Taxable Income	<u>79,465,596</u>	<u>76,704,719</u>	<u>156,170,314</u>
78			
79 Federal Income Taxes + Other	<u>16,683,539</u>	<u>16,107,991</u>	<u>32,791,530</u>

**PacifiCorp**  
**OREGON**  
**Normalized Results of Operations - 2020 PROTOCOL**  
**Twelve Months Ending December 31, 2023**

**TRANSITION ADJUSTMENT MECHANISM RESULTS**

	(1)	(2)	(3) (1) + (2)
	Total Adjusted Results	TAM Price Change	Total Normalized Results with Price Change
1 Operating Revenues:			
2 General Business Revenues	288,541,329	94,282,733	382,824,062
3 Interdepartmental	-		-
4 Special Sales	102,596,785		102,596,785
5 Other Operating Revenues	-		-
6 Total Operating Revenues	<u>391,138,114</u>	<u>94,282,733</u>	<u>485,420,847</u>
7			
8 Operating Expenses:			
9 Steam Production	166,383,477		166,383,477
10 Nuclear Production	-		-
11 Hydro Production	-		-
12 Other Power Supply	348,730,427		348,730,427
13 Transmission	40,311,763		40,311,763
14 Distribution	-		-
15 Customer Accounting	-	-	-
16 Customer Service & Info	-		-
17 Sales	-		-
18 Administrative & General	-		-
19			
20 Total O&M Expenses	<u>555,425,668</u>	<u>-</u>	<u>555,425,668</u>
21			
22 Depreciation	-		-
23 Amortization	-		-
24 Taxes Other Than Income	-	-	-
25 Income Taxes - Federal	(85,727,084)	18,900,482	(66,826,602)
26 Income Taxes - State	(7,458,655)	4,280,436	(3,178,219)
27 Income Taxes - Def Net	-		-
28 Investment Tax Credit Adj.	-		-
29 Misc Revenue & Expense	-		-
30			
31 Total Operating Expenses:	<u>462,239,929</u>	<u>23,180,918</u>	<u>485,420,847</u>
32			
33 Operating Rev For Return:	<u>(71,101,815)</u>	<u>71,101,815</u>	<u>-</u>
34			
35 Rate Base:			
36 Electric Plant In Service	-		-
37 Plant Held for Future Use	-		-
38 Misc Deferred Debits	-		-
39 Elec Plant Acq Adj	-		-
40 Pension	-		-
41 Prepayments	-		-
42 Fuel Stock	-		-
43 Material & Supplies	-		-
44 Working Capital	-		-
45 Weatherization Loans	-		-
46 Misc Rate Base	-		-
47			
48 Total Electric Plant:	<u>-</u>		<u>-</u>
49			
50 Rate Base Deductions:			
51 Accum Prov For Deprec	-		-
52 Accum Prov For Amort	-		-
53 Accum Def Income Tax	-		-
54 Unamortized ITC	-		-
55 Customer Adv For Const	-		-
56 Customer Service Deposits	-		-
57 Misc Rate Base Deductions	-		-
58			
59 Total Rate Base Deductions	<u>-</u>		<u>-</u>
60			
61 Total Rate Base:	<u>-</u>		<u>-</u>
62			
63 Return on Rate Base	N/A		N/A
64			
65 Return on Equity	N/A		N/A
66			
67 TAX CALCULATION:			
68 Operating Revenue	(164,287,554)	94,282,733	(70,004,820)
69 Other Deductions	-		-
70 Interest (AFUDC)	-	-	-
71 Interest	-	-	-
72 Schedule "M" Additions	-	-	-
73 Schedule "M" Deductions	-	-	-
74 Income Before Tax	<u>(164,287,554)</u>	<u>94,282,733</u>	<u>(70,004,820)</u>
75			
76 State Income Taxes	(7,458,655)	4,280,436	(3,178,219)
77 Taxable Income	<u>(156,828,899)</u>	<u>90,002,297</u>	<u>(66,826,602)</u>
78			
79 Federal Income Taxes + Other	<u>(85,727,084)</u>	<u>18,900,482</u>	<u>(66,826,602)</u>

**PacifiCorp**  
**OREGON**  
**Normalized Results of Operations - 2020 PROTOCOL**  
**Twelve Months Ending December 31, 2023**

	(1) Total Adjusted Results	(2) Price Change	(3) Results with Price Change
1 Operating Revenues:			
2 General Business Revenues	1,245,562,594	180,712,173	1,426,274,767
3 Interdepartmental	-		
4 Special Sales	102,596,785		
5 Other Operating Revenues	80,909,734		
6 Total Operating Revenues	<u>1,429,069,113</u>		
7			
8 Operating Expenses:			
9 Steam Production	251,200,664		
10 Nuclear Production	-		
11 Hydro Production	12,195,411		
12 Other Power Supply	367,975,636		
13 Transmission	59,585,511		
14 Distribution	116,474,578		
15 Customer Accounting	23,650,478	912,087	24,562,565
16 Customer Service & Info	4,692,219		
17 Sales	-		
18 Administrative & General	63,204,272		
19			
20 Total O&M Expenses	898,978,769		
21			
22 Depreciation	287,295,417		
23 Amortization	34,357,204		
24 Taxes Other Than Income	89,848,715	5,164,621	95,013,336
25 Income Taxes - Federal	(69,043,545)	35,008,473	(34,035,072)
26 Income Taxes - State	(3,423,104)	7,928,450	4,505,346
27 Income Taxes - Def Net	14,587,854		
28 Investment Tax Credit Adj.	-		
29 Misc Revenue & Expense	4,502		
30			
31 Total Operating Expenses:	1,252,605,813	49,013,631	1,301,619,444
32			
33 Operating Rev For Return:	<u>176,463,300</u>	<u>131,698,542</u>	<u>308,161,842</u>
34			
35 Rate Base:			
36 Electric Plant In Service	8,832,858,186		
37 Plant Held for Future Use	-		
38 Misc Deferred Debits	67,039,001		
39 Elec Plant Acq Adj	699,759		
40 Pensions	-		
41 Prepayments	11,116,576		
42 Fuel Stock	37,219,586		
43 Material & Supplies	81,632,777		
44 Working Capital	13,614,617		
45 Weatherization Loans	-		
46 Misc Rate Base	(101,493)		
47			
48 Total Electric Plant:	9,044,079,009	-	9,044,079,009
49			
50 Rate Base Deductions:			
51 Accum Prov For Deprec	(3,565,614,879)		
52 Accum Prov For Amort	(217,778,883)		
53 Accum Def Income Tax	(643,328,592)		
54 Unamortized ITC	(45,658)		
55 Customer Adv For Const	(22,975,394)		
56 Customer Service Deposits	-		
57 Misc Rate Base Deductions	(414,776,627)		
58			
59 Total Rate Base Deductions	(4,864,520,032)	-	(4,864,520,032)
60			
61 Total Rate Base:	<u>4,179,558,977</u>	<u>-</u>	<u>4,179,558,977</u>
62			
63 Return on Rate Base	4.222%		7.373%
64			
65 Return on Equity	3.769%		9.800%
66			
67 TAX CALCULATION:			
68 Operating Revenue	118,584,505	174,635,466	293,219,971
69 Other Deductions			
70 Interest (AFUDC)	(21,314,425)	-	(21,314,425)
71 Interest	94,119,313	-	94,119,313
72 Schedule "M" Additions	325,051,640	-	325,051,640
73 Schedule "M" Deductions	451,617,664	-	451,617,664
74 Income Before Tax	(80,786,407)	174,635,466	93,849,059
75			
76 State Income Taxes	(3,423,104)	7,928,450	4,505,346
77 Taxable Income	<u>(77,363,303)</u>	<u>166,707,016</u>	<u>89,343,713</u>
78			
79 Federal Income Taxes + Other	<u>(69,043,545)</u>	<u>35,008,473</u>	<u>(34,035,072)</u>

**PacifiCorp**  
**OREGON**  
**Normalized Results of Operations - 2020 PROTOCOL**  
**Twelve Months Ending December 31, 2023**

Net Rate Base	\$ 4,179,558,977	Ref. Page 1.1
Return on Rate Base Requested	<u>7.37%</u>	Ref. Page 2.0
Revenues Required to Earn Requested Return	308,161,842	
Less Current Operating Revenues	<u>(176,463,300)</u>	
Increase to Current Revenues	131,698,542	
Net to Gross Bump-up	<u>137.22%</u>	
Price Change Required for Requested Return	<u>\$ 180,712,173</u>	
Requested Price Change	\$ 180,712,173	
Uncollectible Percent	0.505%	Ref. Page 1.6
Increased Uncollectible Expense	<u>\$ 912,087</u>	
Requested Price Change	\$ 180,712,173	
Franchise Tax	2.303%	Ref. Page 1.6
Revenue Tax	0.000%	Ref. Page 1.6
Resource Supplier Tax	0.125%	Ref. Page 1.6
PUC Fees Based on General Business Revenues	0.430%	Ref. Page 1.6
Increase Taxes Other Than Income	<u>\$ 5,164,621</u>	
Requested Price Change	\$ 180,712,173	
Uncollectible Expense	(912,087)	
Taxes Other Than Income	<u>(5,164,621)</u>	
Income Before Taxes	<u>\$ 174,635,466</u>	
State Effective Tax Rate	4.54%	Ref. Page 2.0
State Income Taxes	<u>\$ 7,928,450</u>	
Taxable Income	\$ 166,707,016	
Federal Income Tax Rate	21.00%	Ref. Page 2.0
Federal Income Taxes	<u>\$ 35,008,473</u>	
Operating Income	100.000%	
Net Operating Income	<u>72.878%</u>	Ref. Page 1.6
Net to Gross Bump-Up	<u>137.22%</u>	

**PacifiCorp  
OREGON  
Normalized Results of Operations - 2020 PROTOCOL  
Twelve Months Ending December 31, 2023**

Operating Revenue	100.000%	
Operating Deductions		
Uncollectible Accounts	0.505%	See Note (1) Below
Taxes Other - Franchise Tax	2.303%	
Taxes Other - Revenue Tax	0.000%	
Taxes Other - Resource Supplier	0.125%	
PUC Fees Based on General Business Revenues	<u>0.430%</u>	
Sub-Total	96.637%	
State Income Tax @ 4.54%	<u>4.387%</u>	
Sub-Total	92.250%	
Federal Income Tax @ 21.00%	<u>19.373%</u>	
Net Operating Income	<u><u>72.878%</u></u>	

(1) Uncollectible Accounts =	<u>6,286,577</u>	Pg 2.11, OREGON Situs from Account 904
	1,245,562,594	Pg. 2.2, General Business Revenues

**Pacificorp**  
**Oregon General Rate Case**  
**Adjustment Summary**  
**Twelve Months Ending December 31, 2023**

	TOTAL COMPANY UNADJUSTED RESULTS JUNE 2021	OREGON ALLOCATED UNADJUSTED RESULTS JUNE 2021	Tab 3 Revenue Adjustments	Tab 4 O&M Adjustments	Tab 5 Net Power Cost Adjustments	Tab 6 Depreciation & Amortization Adjustments
1 Operating Revenues:						
2 General Business Revenues	5,081,632,249	1,308,339,123	(64,543,148)	1,766,619	-	-
3 Interdepartmental	-	-	-	-	-	-
4 Special Sales	212,315,668	52,011,190	-	-	50,585,595	-
5 Other Operating Revenues	227,962,549	74,106,867	4,692,224	-	-	-
6 Total Operating Revenues	5,521,910,467	1,434,457,180	(59,850,924)	1,766,619	50,585,595	-
7						
8 Operating Expenses:						
9 Steam Production	997,145,306	255,077,987	-	6,978,517	(1,460,911)	3,613,145
10 Nuclear Production	-	-	-	-	-	-
11 Hydro Production	76,270,911	19,831,780	-	(7,636,369)	-	-
12 Other Power Supply	1,076,832,156	265,666,668	-	3,243,585	99,362,079	-
13 Transmission	220,828,048	57,246,429	-	692,526	1,646,555	-
14 Distribution	227,788,851	88,583,363	-	27,891,214	-	-
15 Customer Accounting	70,180,739	22,022,443	-	1,628,035	-	-
16 Customer Service & Info	116,029,408	5,610,498	-	343,920	-	-
17 Sales	-	-	-	-	-	-
18 Administrative & General	296,924,361	86,785,274	-	(22,636,322)	-	-
19						
20 Total O&M Expenses	3,081,999,779	800,824,443	-	10,505,107	99,547,723	3,613,145
21						
22 Depreciation	1,035,081,277	232,134,017	-	-	-	58,358,262
23 Amortization	61,823,778	16,281,354	-	-	-	24,556,791
24 Taxes Other Than Income	212,196,714	79,011,374	-	(1,555,006)	-	-
25 Income Taxes - Federal	(36,629,750)	6,600,112	(11,997,447)	425,610	(9,818,976)	(13,638,561)
26 Income Taxes - State	24,994,902	8,911,646	(2,717,090)	96,389	(2,223,726)	(3,088,756)
27 Income Taxes - Def Net	(64,900,993)	(21,537,286)	-	(2,473,765)	-	(253,869)
28 Investment Tax Credit Adj.	(1,703,368)	-	-	-	-	-
29 Misc Revenue & Expense	(1,733,836)	(98,098)	-	102,600	-	-
30						
31 Total Operating Expenses:	4,311,128,503	1,122,127,562	(14,714,537)	7,100,936	87,505,021	69,547,012
32						
33 Operating Rev For Return:	1,210,781,963	312,329,618	(45,136,387)	(5,334,317)	(36,919,426)	(69,547,012)
34						
35 Rate Base:						
36 Electric Plant In Service	31,317,729,025	8,552,036,959	-	-	-	-
37 Plant Held for Future Use	23,896,248	9,650,600	-	-	-	-
38 Misc Deferred Debits	962,744,647	193,185,982	-	-	-	-
39 Elec Plant Acq Adj	14,875,820	1,748,416	-	-	-	-
40 Pensions	28,656,862	7,773,234	-	-	-	-
41 Prepayments	67,554,352	11,116,576	-	-	-	-
42 Fuel Stock	201,471,836	50,207,063	-	-	-	-
43 Material & Supplies	273,026,865	83,021,764	-	-	-	-
44 Working Capital	46,257,939	13,952,625	(139,082)	89,530	827,098	(123,955)
45 Weatherization Loans	199,224,237	-	-	-	-	-
46 Misc Rate Base	-	-	-	-	-	-
47						
48 Total Electric Plant:	33,135,437,831	8,922,693,219	(139,082)	89,530	827,098	(123,955)
49						
50 Rate Base Deductions:						
51 Accum Prov For Deprec	(9,626,761,743)	(2,811,129,532)	-	-	-	(750,859,439)
52 Accum Prov For Amort	(691,673,798)	(201,224,878)	-	-	-	(16,554,005)
53 Accum Def Income Tax	(2,565,819,019)	(623,397,645)	-	(9,413,907)	-	(602,826)
54 Unamortized ITC	(2,245,487)	(50,219)	-	-	-	-
55 Customer Adv For Const	(104,109,027)	(28,049,700)	-	-	-	-
56 Customer Service Deposits	-	-	-	-	-	-
57 Misc Rate Base Deductions	(2,269,895,491)	(489,521,399)	-	38,288,770	-	(7,266,788)
58						
59 Total Rate Base Deductions	(15,260,504,564)	(4,153,373,373)	-	28,874,864	-	(775,283,057)
60						
61 Total Rate Base:	17,874,933,268	4,769,319,847	(139,082)	28,964,394	827,098	(775,407,012)
62						
63 Return on Rate Base		6.549%	-0.946%	-0.145%	-0.770%	-0.825%
64						
65 Return on Equity		8.222%	-1.811%	-0.278%	-1.474%	-1.579%
66						
67 TAX CALCULATION:						
68 Operating Revenue		306,304,090	(59,850,924)	(7,286,082)	(48,962,128)	(86,528,198)
69 Other Deductions						
70 Interest (AFUDC)		(20,225,807)	-	-	-	-
71 Interest		107,400,113	(3,132)	652,248	18,625	(17,461,358)
72 Schedule "M" Additions		405,703,893	-	10,061,436	-	1,032,557
73 Schedule "M" Deductions		428,541,915	-	-	-	-
74 Income Before Tax		196,291,762	(59,847,792)	2,123,106	(48,980,754)	(68,034,283)
75						
76 State Income Taxes		8,911,646	(2,717,090)	96,389	(2,223,726)	(3,088,756)
77 Taxable Income		187,380,116	(57,130,702)	2,026,717	(46,757,027)	(64,945,526)
78						
79 Federal Income Taxes + Other		6,600,112	(11,997,447)	425,610	(9,818,976)	(13,638,561)
APPROXIMATE PRICE CHANGE		53,918,354	61,914,993	10,284,735	50,743,235	16,981,512



**Pacificorp**  
**Oregon General Rate Case**  
**Adjustment Summary**  
**Twelve Months Ending December 31, 2023**

	Tab 7	Tab 8	REPLY	OR Allocated
	Tax Adjustments	Rate Base Adjustments	Reply Adjustments NEW	Results of Operations December 2023
1 Operating Revenues:				
2 General Business Revenues	-	-	-	1,245,562,594
3 Interdepartmental	-	-	-	-
4 Special Sales	-	-	-	102,596,785
5 Other Operating Revenues	-	2,110,642	-	80,909,734
6 Total Operating Revenues	-	2,110,642	-	1,429,069,113
7				
8 Operating Expenses:				
9 Steam Production	-	(13,008,075)	-	251,200,664
10 Nuclear Production	-	-	-	-
11 Hydro Production	-	-	-	12,195,411
12 Other Power Supply	-	(296,695)	-	367,975,636
13 Transmission	-	-	-	59,585,511
14 Distribution	-	-	-	116,474,578
15 Customer Accounting	-	-	-	23,650,478
16 Customer Service & Info	-	-	(1,262,199)	4,692,219
17 Sales	-	-	-	-
18 Administrative & General	-	(981,960)	37,280	63,204,272
19				
20 Total O&M Expenses	-	(14,286,730)	(1,224,919)	898,978,769
21				
22 Depreciation	-	(3,084,897)	(111,966)	287,295,417
23 Amortization	-	(5,513,344)	(967,597)	34,357,204
24 Taxes Other Than Income	12,093,289	299,058	-	89,848,715
25 Income Taxes - Federal	(46,690,936)	5,583,516	493,136	(69,043,545)
26 Income Taxes - State	(5,777,760)	1,264,512	111,682	(3,423,104)
27 Income Taxes - Def Net	40,658,443	(1,790,335)	(15,334)	14,587,854
28 Investment Tax Credit Adj.	-	-	-	-
29 Misc Revenue & Expense	-	-	-	4,502
30				
31 Total Operating Expenses:	283,037	(17,528,220)	(1,714,998)	1,252,605,813
32				
33 Operating Rev For Return:	(283,037)	19,638,863	1,714,998	176,463,300
34				
35 Rate Base:				
36 Electric Plant In Service	-	284,999,713	(4,178,486)	8,832,858,186
37 Plant Held for Future Use	-	(9,650,600)	-	-
38 Misc Deferred Debits	-	(126,146,982)	-	67,039,001
39 Elec Plant Acq Adj	-	(1,048,657)	-	699,759
40 Pensions	-	(7,773,234)	-	-
41 Prepayments	-	-	-	11,116,576
42 Fuel Stock	-	(12,987,477)	-	37,219,586
43 Material & Supplies	-	(1,388,987)	-	81,632,777
44 Working Capital	(381,628)	(604,109)	(5,861)	13,614,617
45 Weatherization Loans	-	-	-	-
46 Misc Rate Base	-	-	(101,493)	(101,493)
47				
48 Total Electric Plant:	(381,628)	125,399,667	(4,285,840)	9,044,079,009
49				
50 Rate Base Deductions:				
51 Accum Prov For Deprec	-	(3,734,651)	108,742	(3,565,614,879)
52 Accum Prov For Amort	-	-	-	(217,778,883)
53 Accum Def Income Tax	(50,268,963)	40,313,480	41,268	(643,328,592)
54 Unamortized ITC	4,561	-	-	(45,658)
55 Customer Adv For Const	-	5,074,306	-	(22,975,394)
56 Customer Service Deposits	-	-	-	-
57 Misc Rate Base Deductions	27,572,240	16,150,550	-	(414,776,627)
58				
59 Total Rate Base Deductions	(22,692,161)	57,803,685	150,010	(4,864,520,032)
60				
61 Total Rate Base:	(23,073,790)	183,203,352	(4,135,830)	4,179,558,977
62				
63 Return on Rate Base	0.015%	0.300%	0.045%	4.222%
64				
65 Return on Equity	0.029%	0.573%	0.086%	3.769%
66				
67 TAX CALCULATION:				
68 Operating Revenue	(12,093,289)	24,696,555	2,304,482	118,584,505
69 Other Deductions	-	-	-	-
70 Interest (AFUDC)	(1,088,618)	-	-	(21,314,425)
71 Interest	(519,598)	4,125,549	(93,135)	94,119,313
72 Schedule "M" Additions	(93,815,684)	2,178,179	(108,742)	325,051,640
73 Schedule "M" Deductions	28,350,317	(5,103,496)	(171,072)	451,617,664
74 Income Before Tax	(132,651,075)	27,852,681	2,459,947	(80,786,407)
75				
76 State Income Taxes	(5,777,760)	1,264,512	111,682	(3,423,104)
77 Taxable Income	(126,873,315)	26,588,170	2,348,265	(77,363,303)
78				
79 Federal Income Taxes + Other	(46,690,936)	5,583,516	493,136	(69,043,545)
APPROXIMATE PRICE CHANGE	(1,946,019)	(8,412,951)	(2,771,686)	180,712,173

# Tab \$ - Rebad

**PacifiCorp  
RESULTS OF OPERATIONS**

USER SPECIFIC INFORMATION

STATE:	OREGON
PERIOD:	TWELVE MONTHS ENDING DECEMBER 31, 2023
FILE:	OR JAM Dec 2023 GRC
PREPARED BY:	Revenue Requirement Department
DATE:	7/14/2022
TIME:	2:56:13 PM
TYPE OF RATE BASE:	Year End
ALLOCATION METHOD:	<b>2020 PROTOCOL</b>
FERC JURISDICTION:	Separate Jurisdiction
8 OR 12 CP:	12 Coincident Peaks
DEMAND %	75% Demand
ENERGY %	25% Energy

TAX INFORMATION

<u>TAX RATE ASSUMPTIONS:</u>	<u>TAX RATE</u>
FEDERAL RATE	21.00%
STATE EFFECTIVE RATE	4.54%
TAX GROSS UP FACTOR	1.326
FEDERAL/STATE COMBINED RATE	24.587%

CAPITAL STRUCTURE INFORMATION

	<u>CAPITAL STRUCTURE</u>	<u>EMBEDDED COST</u>	<u>WEIGHTED COST</u>
DEBT	47.74%	4.72%	2.25%
PREFERRED	0.01%	6.75%	0.00%
COMMON	52.25%	9.80%	5.12%
	<u>100.00%</u>		<u>7.37%</u>

OTHER INFORMATION

For information and support regarding capital structure and cost of debt, see reply testimony of Ms. Nikki L. Kobliha.  
For information and support regarding return on common equity, see reply testimony of Ms. Ann E. Bulkley.

2020 PROTOCOL  
Year End

RESULTS OF OPERATIONS SUMMARY

Description of Account Summary:	Ref	JUNE 2021 UNADJUSTED RESULTS		DECEMBER 2023 NORMALIZED RESULTS	
		TOTAL	OREGON	TOTAL	OREGON
1 Operating Revenues					
2     General Business Revenues	2.2	5,081,632,249	1,308,339,123	5,018,855,720	1,245,562,594
3     Interdepartmental	2.2	0	0	0	0
4     Special Sales	2.2	212,315,668	52,011,190	407,016,694	102,596,785
5     Other Operating Revenues	2.3	227,962,549	74,106,867	248,118,986	80,909,734
6     Total Operating Revenues	2.3	5,521,910,467	1,434,457,180	5,673,991,400	1,429,069,113
7					
8 Operating Expenses:					
9     Steam Production	2.5	997,145,306	255,077,987	981,382,858	251,200,664
10     Nuclear Production	2.5	0	0	0	0
11     Hydro Production	2.6	76,270,911	19,831,780	46,902,250	12,195,411
12     Other Power Supply	2.7, .8	1,076,832,156	265,666,668	1,453,579,215	367,975,636
13     Transmission	2.9	220,828,048	57,246,429	229,446,255	59,585,511
14     Distribution	2.10	227,788,851	88,583,363	267,980,263	116,474,578
15     Customer Accounting	2.11	70,180,739	22,022,443	75,703,664	23,650,478
16     Customer Service & Infor	2.12	116,029,408	5,610,498	127,498,765	4,692,219
17     Sales	2.12	0	0	0	0
18     Administrative & General	2.13	296,924,361	86,785,274	202,517,533	63,204,272
19					
20     Total O & M Expenses	2.13	3,081,999,779	800,824,443	3,385,010,804	898,978,769
21					
22     Depreciation	2.14	1,035,081,277	232,134,017	1,271,204,884	287,295,417
23     Amortization	2.15	61,823,778	16,281,354	81,415,153	34,357,204
24     Taxes Other Than Income	2.15	212,196,714	79,011,374	240,472,853	89,848,715
25     Income Taxes - Federal	2.18	(36,629,730)	6,600,112	(196,760,593)	(69,043,545)
26     Income Taxes - State	2.18	24,994,902	8,911,646	17,921,046	(3,423,104)
27     Income Taxes - Def Net	2.16	(64,900,993)	(21,537,286)	(51,893,297)	14,587,854
28     Investment Tax Credit Adj.	2.15	(1,703,368)	0	(1,055,733)	0
29     Misc Revenue & Expense	2.3	(1,733,836)	(98,098)	(1,503,560)	4,502
30					
31     Total Operating Expenses	2.18	4,311,128,503	1,122,127,562	4,744,811,557	1,252,605,813
32					
33     Operating Revenue for Return		1,210,781,963	312,329,618	929,179,843	176,463,300
34					
35 Rate Base:					
36     Electric Plant in Service	2.26	31,317,729,025	8,552,036,959	32,563,280,596	8,832,858,186
37     Plant Held for Future Use	2.26	23,896,248	9,650,600	0	0
38     Misc Deferred Debits	2.28	962,744,647	193,185,982	459,239,830	67,039,001
39     Elec Plant Acq Adj	2.26,.27	14,875,820	1,748,416	10,842,796	699,759
40     Pensions	2.27	28,656,862	7,773,234	0	0
41     Prepayments	2.28	67,554,352	11,116,576	67,554,352	11,116,576
42     Fuel Stock	2.27	201,471,836	50,207,063	149,355,445	37,219,586
43     Material & Supplies	2.28	273,026,865	83,021,764	267,684,968	81,632,777
44     Working Capital	2.28	46,257,939	13,952,625	44,594,394	13,614,617
45     Weatherization Loans	2.27	199,224,237	0	199,224,237	0
46     Miscellaneous Rate Base	2.29	0	0	(101,493)	(101,493)
47					
48     Total Electric Plant		33,135,437,831	8,922,693,219	33,761,675,125	9,044,079,009
49					
50 Rate Base Deductions:					
51     Accum Prov For Depr	2.32	(9,626,761,743)	(2,811,129,532)	(12,049,714,476)	(3,565,614,879)
52     Accum Prov For Amort	2.33	(691,673,798)	(201,224,878)	(749,438,517)	(217,778,883)
53     Accum Def Income Taxes	2.30	(2,565,819,019)	(623,397,645)	(2,702,654,538)	(643,328,592)
54     Unamortized ITC	2.30	(2,245,487)	(50,219)	(2,339,440)	(45,658)
55     Customer Adv for Const	2.29	(104,109,027)	(28,049,700)	(104,109,027)	(22,975,394)
56     Customer Service Deposits	2.29	0	0	0	0
57     Misc. Rate Base Deductions	2.29	(2,269,895,491)	(489,521,399)	(2,038,041,418)	(414,776,627)
58					
59     Total Rate Base Deductions		(15,260,504,564)	(4,153,373,373)	(17,646,297,416)	(4,864,520,032)
60					
61     Total Rate Base		17,874,933,268	4,769,319,847	16,115,377,710	4,179,558,977
62					
63     Return on Rate Base			6.549%		4.222%
64					
65     Return on Equity			8.222%		3.769%
66     Net Power Costs			404,150,174	1,778,427,508	452,828,883
67     100 Basis Points in Equity:					
68         Revenue Requirement Impact			33,044,122	111,655,022	28,957,978
69         Rate Base Decrease			(352,409,914)	(1,339,040,739)	(460,279,063)

2020 PROTOCOL				JUNE 2021		DECEMBER 2023			
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS			
ACCT	DESCRIP	BUS FUNC	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON	
70	Sales to Ultimate Customers								
71	440	Residential Sales							
72		0	S		2,032,842,216	658,842,617	1,985,664,696	611,665,097	
73									
74				B1	<u>2,032,842,216</u>	<u>658,842,617</u>	<u>1,985,664,696</u>	<u>611,665,097</u>	
75									
76	442	Commercial & Industrial Sales							
77		0	S		3,031,724,688	643,689,980	3,017,640,723	629,606,015	
78		P	SE		-	-	-	-	
79		PT	SG		-	-	-	-	
80									
81									
82				B1	<u>3,031,724,688</u>	<u>643,689,980</u>	<u>3,017,640,723</u>	<u>629,606,015</u>	
83									
84	444	Public Street & Highway Lighting							
85		0	S		17,065,345	5,806,526	15,550,301	4,291,482	
86		0	SO		-	-	-	-	
87				B1	<u>17,065,345</u>	<u>5,806,526</u>	<u>15,550,301</u>	<u>4,291,482</u>	
88									
89	445	Other Sales to Public Authority							
90		0	S		-	-	-	-	
91									
92				B1	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	
93									
94	448	Interdepartmental							
95		DPW	S		-	-	-	-	
96		GP	SO		-	-	-	-	
97				B1	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	
98									
99	<b>Total Sales to Ultimate Customers</b>				<b>B1</b>	<b><u>5,081,632,249</u></b>	<b><u>1,308,339,123</u></b>	<b><u>5,018,855,720</u></b>	<b><u>1,245,562,594</u></b>
100									
101									
102									
103	447	Sales for Resale-Non NPC							
104		P	S		12,440,401	-	12,440,401	-	
105				B1	<u>12,440,401</u>	<u>-</u>	<u>12,440,401</u>	<u>-</u>	
106									
107	447NPC	Sales for Resale-NPC							
108		P	SG		203,582,710	52,935,090	394,576,293	102,596,785	
109		P	SE		(3,707,443)	(923,900)	-	-	
110		P	SG		-	-	-	-	
111				B1	<u>199,875,267</u>	<u>52,011,190</u>	<u>394,576,293</u>	<u>102,596,785</u>	
112									
113		Total Sales for Resale		B1	<u>212,315,668</u>	<u>52,011,190</u>	<u>407,016,694</u>	<u>102,596,785</u>	
114									
115	449	Provision for Rate Refund							
116		P	S		-	-	-	-	
117		P	SG		(3,239,918)	(842,436)	(3,239,918)	(842,436)	
118									
119									
120				B1	<u>(3,239,918)</u>	<u>(842,436)</u>	<u>(3,239,918)</u>	<u>(842,436)</u>	
121									
122	<b>Total Sales from Electricity</b>				<b>B1</b>	<b><u>5,290,707,999</u></b>	<b><u>1,359,507,877</u></b>	<b><u>5,422,632,496</u></b>	<b><u>1,347,316,943</u></b>
123	450	Forfeited Discounts & Interest							
124		CUST	S		6,599,968	(19,497)	6,599,968	(19,497)	
125		CUST	SO		-	-	-	-	
126				B1	<u>6,599,968</u>	<u>(19,497)</u>	<u>6,599,968</u>	<u>(19,497)</u>	
127									
128	451	Misc Electric Revenue							
129		CUST	S		8,210,111	1,545,976	8,210,111	1,545,976	
130		GP	SG		-	-	-	-	
131		GP	SO		52,826	14,329	52,826	14,329	
132				B1	<u>8,262,937</u>	<u>1,560,305</u>	<u>8,262,937</u>	<u>1,560,305</u>	
133									
134	453	Water Sales							
135		P	SG		7,350	1,911	7,350	1,911	
136				B1	<u>7,350</u>	<u>1,911</u>	<u>7,350</u>	<u>1,911</u>	
137									
138	454	Rent of Electric Property							
139		DPW	S		10,236,067	4,606,685	10,236,067	4,606,685	
140		T	SG		4,867,665	1,265,679	4,867,665	1,265,679	
141		T	SG		-	-	-	-	
142		GP	SO		3,142,114	852,305	3,142,114	852,305	
143				B1	<u>18,245,846</u>	<u>6,724,669</u>	<u>18,245,846</u>	<u>6,724,669</u>	



2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End	FERC	BUS	FACTOR	Ref	UNADJUSTED RESULTS		NORMALIZED RESULTS	
ACCT	DESCRIP	FUNC			TOTAL	OREGON	TOTAL	OREGON
215	500	Operation Supervision & Engineering						
216		P	SG		13,865,751	3,605,339	14,703,795	3,823,246
217		P	SG		1,084,539	281,999	1,181,379	307,179
218		P	SG		-	-	(58)	(15)
219				B2	14,950,290	3,887,339	15,885,117	4,130,410
220								
221	501	Fuel Related-Non NPC						
222		P	S		6,207,125	4,921,418	6,761,370	5,360,860
223		P	SE		16,755,152	4,175,407	32,750,146	8,161,382
224		P	SE		-	-	-	-
225		P	SE		-	-	-	-
226		P	SE		264,509	65,916	288,127	71,802
227				B2	23,226,786	9,162,741	39,799,643	13,594,044
228								
229	501NPC	Fuel Related-NPC						
230		P	S		137,244	-	-	-
231		P	SE		637,368,410	158,833,098	632,141,846	157,530,631
232		P	SE		-	-	-	-
233		P	SE		-	-	-	-
234		P	SE		31,040,758	7,735,400	31,040,758	7,735,400
235				B2	668,546,412	166,568,498	663,182,604	165,266,031
236								
237		Total Fuel Related		B2	691,773,198	175,731,239	702,982,247	178,860,075
238								
239	502	Steam Expenses						
240		P	SG		75,504,557	19,632,514	81,684,367	21,239,374
241		P	SG		4,617,621	1,200,663	5,029,937	1,307,872
242		P	SG		-	-	1	0
243				B2	80,122,178	20,833,177	86,714,304	22,547,246
244								
245	503	Steam From Other Sources-Non-NPC						
246		P	SE		-	-	(2,626)	(654)
247				B2	-	-	(2,626)	(654)
248								
249	503NPC	Steam From Other Sources-NPC						
250		P	SE		5,119,912	1,275,889	4,484,106	1,117,446
251				B2	5,119,912	1,275,889	4,484,106	1,117,446
252								
253	505	Electric Expenses						
254		P	SG		1,041,685	270,857	1,132,737	294,531
255		P	SG		131,171	34,107	142,883	37,152
256		P	SG		-	-	-	-
257				B2	1,172,856	304,963	1,275,620	331,684
258								
259	506	Misc. Steam Expense						
260		P	SG		57,377,431	14,919,143	61,609,473	16,019,548
261		P	SG		-	-	(54,496,454)	(14,170,038)
262		P	SG		1,448,672	376,680	1,578,026	410,315
263				B2	58,826,103	15,295,823	8,691,046	2,259,825
264								
265	507	Rents						
266		P	SG		466,659	121,340	508,328	132,174
267		P	SG		-	-	-	-
268		P	SG		237	62	258	67
269				B2	466,896	121,401	508,586	132,241
270								
271	510	Maint Supervision & Engineering						
272		P	SG		5,990,074	1,557,525	6,452,587	1,677,786
273		P	SG		1,064,231	276,719	1,203,634	312,966
274		P	SG		-	-	668,391	173,793
275				B2	7,054,305	1,834,243	8,324,612	2,164,546
276								
277								
278								
279	511	Maintenance of Structures						
280		P	SG		22,011,978	5,723,502	24,317,413	6,322,956
281		P	SG		2,549,103	662,812	2,883,007	749,633
282		P	SG		-	-	-	-
283				B2	24,561,081	6,386,314	27,200,420	7,072,588
284								
285	512	Maintenance of Boiler Plant						
286		P	SG		67,917,271	17,659,687	75,154,604	19,541,521
287		P	SG		1,744,893	453,703	1,973,384	513,115
288		P	SG		-	-	-	-
289				B2	69,662,164	18,113,389	77,127,988	20,054,635
290								
291	513	Maintenance of Electric Plant						
292		P	SG		31,093,354	8,084,820	34,390,945	8,942,251
293		P	SG		300,806	78,215	340,208	88,460
294		P	SG		-	-	-	-
295				B2	31,394,160	8,163,034	34,731,154	9,030,712

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
296								
297	514	Maintenance of Misc. Steam Plant						
298		P	SG		10,579,826	2,750,941	11,806,422	3,069,878
299		P	SG		1,462,336	380,233	1,653,886	430,040
300		P	SG		-	-	(24)	(6)
301				B2	12,042,162	3,131,174	13,460,284	3,499,911
302								
303		<b>Total Steam Power Generation</b>		<b>B2</b>	<b>997,145,306</b>	<b>255,077,987</b>	<b>981,382,858</b>	<b>251,200,664</b>
304	517	Operation Super & Engineering						
305		P	SG		-	-	-	-
306				B2	-	-	-	-
307								
308	518	Nuclear Fuel Expense						
309		P	SE		-	-	-	-
310								
311				B2	-	-	-	-
312								
313	519	Coolants and Water						
314		P	SG		-	-	-	-
315				B2	-	-	-	-
316								
317	520	Steam Expenses						
318		P	SG		-	-	-	-
319				B2	-	-	-	-
320								
321								
322								
323	523	Electric Expenses						
324		P	SG		-	-	-	-
325				B2	-	-	-	-
326								
327	524	Misc. Nuclear Expenses						
328		P	SG		-	-	-	-
329				B2	-	-	-	-
330								
331	528	Maintenance Super & Engineering						
332		P	SG		-	-	-	-
333				B2	-	-	-	-
334								
335	529	Maintenance of Structures						
336		P	SG		-	-	-	-
337				B2	-	-	-	-
338								
339	530	Maintenance of Reactor Plant						
340		P	SG		-	-	-	-
341				B2	-	-	-	-
342								
343	531	Maintenance of Electric Plant						
344		P	SG		-	-	-	-
345				B2	-	-	-	-
346								
347	532	Maintenance of Misc Nuclear						
348		P	SG		-	-	-	-
349				B2	-	-	-	-
350								
351		<b>Total Nuclear Power Generation</b>		<b>B2</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
352								
353	535	Operation Super & Engineering						
354		P	SG		-	-	(58)	(15)
355		P	SG		-	-	(2,453)	(638)
356		P	SG		-	-	-	-
357		P	SG		9,461,569	2,460,175	10,212,718	2,655,486
358		P	SG		1,637,780	425,852	1,660,709	431,814
359								
360				B2	11,099,349	2,886,026	11,870,916	3,086,647
361								
362	536	Water For Power						
363		P	SG		-	-	-	-
364		P	SG		294,395	76,548	322,078	83,746
365		P	SG		-	-	-	-
366								
367				B2	294,395	76,548	322,078	83,746
368								
369	537	Hydraulic Expenses						
370		P	SG		-	-	-	-
371		P	SG		4,157,768	1,081,093	4,567,195	1,187,551
372		P	SG		317,694	82,606	349,457	90,865
373								
374				B2	4,475,462	1,163,699	4,916,652	1,278,416



2020 PROTOCOL						JUNE 2021		DECEMBER 2023	
Year End						UNADJUSTED RESULTS		NORMALIZED RESULTS	
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON	
375									
376	538	Electric Expenses							
377		P	DGP		-	-	-	-	
378		P	SG		-	-	-	-	
379		P	SG		-	-	-	-	
380									
381				B2	-	-	-	-	
382									
383	539	Misc. Hydro Expenses							
384		P	SG		-	-	59	15	
385		P	SG		11,778,612	3,062,647	12,720,949	3,307,671	
386		P	SG		6,544,109	1,701,584	7,005,756	1,821,620	
387									
388									
389				B2	18,322,722	4,764,230	19,726,763	5,129,306	
390									
391	540	Rents (Hydro Generation)							
392		P	SG		-	-	-	-	
393		P	SG		1,430,079	371,846	1,578,617	410,468	
394		P	SG		63,838	16,599	70,469	18,323	
395									
396				B2	1,493,917	388,445	1,649,086	428,791	
397									
398	541	Maint Supervision & Engineering							
399		P	SG		-	-	-	-	
400		P	SG		384	100	439	114	
401		P	SG		-	-	-	-	
402									
403				B2	384	100	439	114	
404									
405	542	Maintenance of Structures							
406		P	SG		-	-	-	-	
407		P	SG		742,250	192,998	821,730	213,664	
408		P	SG		72,934	18,964	79,509	20,674	
409									
410				B2	815,184	211,962	901,239	234,338	
411									
412									
413									
414									
415	543	Maintenance of Dams & Waterways							
416		P	SG		-	-	-	-	
417		P	SG		693,668	180,366	766,862	199,398	
418		P	SG		354,924	92,287	393,939	102,431	
419									
420				B2	1,048,592	272,652	1,160,801	301,829	
421									
422	544	Maintenance of Electric Plant							
423		P	SG		-	-	-	-	
424		P	SG		1,627,801	423,257	1,783,013	463,615	
425		P	SG		250,736	65,196	272,301	70,803	
426									
427				B2	1,878,537	488,453	2,055,314	534,418	
428									
429	545	Maintenance of Misc. Hydro Plant							
430		P	SG		-	-	-	-	
431		P	SG		-	-	-	-	
432		P	SG		33,000,000	8,580,581	-	-	
433		P	SG		3,005,661	781,525	3,358,202	873,192	
434		P	SG		836,709	217,559	940,759	244,614	
435									
436				B2	36,842,370	9,579,665	4,298,962	1,117,806	
437									
438		<b>Total Hydraulic Power Generation</b>		<b>B2</b>	<b>76,270,911</b>	<b>19,831,780</b>	<b>46,902,250</b>	<b>12,195,411</b>	
439									
440	546	Operation Super & Engineering							
441		P	SG		320,354	83,298	350,002	91,007	
442		P	SG		-	-	-	-	
443		P	SG		-	-	(13)	(3)	
444				B2	320,354	83,298	349,989	91,003	
445									
446	547	Fuel-Non-NPC							
447		P	SE		-	-	-	-	
448		P	SE		-	-	-	-	
449				B2	-	-	-	-	
450									
451	547NPC	Fuel-NPC							
452		P	SE		289,072,443	72,037,257	341,425,566	85,083,728	
453		P	SE		1,980,087	493,441	1,980,087	493,441	
454				B2	291,052,531	72,530,697	343,405,654	85,577,169	

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC ACCT	DESCRIP	BUS FUNC	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
455								
456	548	Generation Expense						
457		P	SG		17,649,317	4,589,133	19,109,153	4,968,716
458		P	SG		383,214	99,642	415,236	107,969
459		P	SG		-	-	(304)	(79)
460				B2	18,032,530	4,688,775	19,524,085	5,076,606
461								
462	549	Miscellaneous Other						
463		P	S		32,386	32,386	34,768	34,768
464		P	SG		4,035,159	1,049,213	4,276,596	1,111,990
465		P	SG		4,490,304	1,167,558	4,897,700	1,273,488
466		P	SG		-	-	(33,611)	(8,739)
467		P	SG		-	-	-	-
468				B2	8,557,850	2,249,157	9,175,453	2,411,507
469								
470								
471								
472								
473	550	Rents						
474		P	S		377,689	377,689	412,870	412,870
475		P	SG		-	-	-	-
476		P	SG		40,789	10,606	44,588	11,594
477		P	SG		7,423,249	1,930,175	8,114,712	2,109,968
478				B2	7,841,726	2,318,470	8,572,170	2,534,432
479								
480	551	Maint Supervision & Engineering						
481		P	SG		-	-	-	-
482				B2	-	-	-	-
483								
484	552	Maintenance of Structures						
485		P	SG		2,300,976	598,294	2,538,453	660,043
486		P	SG		52,439	13,635	56,878	14,789
487		P	SG		-	-	-	-
488				B2	2,353,416	611,929	2,595,331	674,832
489								
490	553	Maint of Generation & Electric Plant						
491		P	SG		3,849,587	1,000,960	4,262,738	1,108,387
492		P	SG		11,075,955	2,879,943	12,568,401	3,268,006
493		P	SG		235,783	61,308	261,342	67,954
494		P	SG		-	-	2,338,970	608,174
495				B2	15,161,325	3,942,212	19,431,452	5,052,520
496								
497	554	Maintenance of Misc. Other						
498		P	SG		2,049,813	532,987	2,329,977	605,835
499		P	SG		1,006,710	261,762	1,145,202	297,773
500		P	SG		75,591	19,655	82,967	21,573
501		P	SG		-	-	-	-
502				B2	3,132,114	814,405	3,558,145	925,180
503								
504		<b>Total Other Power Generation</b>		<b>B2</b>	<b>346,451,846</b>	<b>87,238,943</b>	<b>406,612,279</b>	<b>102,343,249</b>
505								
506								
507	555	Purchased Power-Non NPC						
508		DMSC	S		3,990,510	-	3,990,510	-
509					3,990,510	-	3,990,510	-
510								
511	555NPC	Purchased Power-NPC						
512		P	S		10,277,762	-	2,571,370	2,571,370
513		P	SE		62,781,784	15,645,308	44,916,482	11,193,250
514		Seasonal Cont P	SG		621,018,560	161,475,763	959,122,106	249,388,639
515		P	DGP		-	-	-	-
516					694,078,107	177,121,071	1,006,609,958	263,153,259
517								
518		Total Purchased Power		B2	698,068,616	177,121,071	1,010,600,468	263,153,259
519								
520	556	System Control & Load Dispatch						
521		P	SG		596,144	155,008	642,914	167,169
522								
523				B2	596,144	155,008	642,914	167,169
524								
525								
526								
527	557	Other Expenses						
528		P	S		6,878,698	3,050,781	7,517,133	3,334,956
529		P	SG		34,992,756	9,098,733	38,361,530	9,974,673
530		P	SGCT		-	-	-	-
531		P	SE		8,552	2,131	9,348	2,330
532		P	SG		-	-	-	-
533		P	TROJP		-	-	-	-
534								
535				B2	41,880,006	12,151,645	45,888,011	13,311,959

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
ACCT	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
536								
537	Embedded Cost Differentials							
538	Company Owned Hydro	P	DGP		-	-	-	-
539	Company Owned Hydro	P	SG		-	-	-	-
540	Mid-C Contract	P	MC		-	-	-	-
541	Mid-C Contract	P	SG		-	-	-	-
542	Existing QF Contracts	P	S		-	-	-	-
543	Existing QF Contracts	P	SG		-	-	-	-
544								
545								
546								
547								
548								
549								
550	2020 Protocol Adjustment							
551	Baseline ECD	P	S		(10,164,458)	(11,000,000)	(10,164,458)	(11,000,000)
552		P	S		-	-	-	-
553	2020 Protocol Adjustment				(10,164,458)	(11,000,000)	(10,164,458)	(11,000,000)
554								
555	<b>Total Other Power Supply</b>			<b>B2</b>	<b>730,380,310</b>	<b>178,427,724</b>	<b>1,046,966,936</b>	<b>265,632,387</b>
556								
557	<b>Total Production Expense</b>			<b>B2</b>	<b>2,150,248,373</b>	<b>540,576,435</b>	<b>2,481,864,323</b>	<b>631,371,711</b>
558								
559								
560	Summary of Production Expense by Factor							
561	S				17,736,957	(2,617,726)	11,123,563	714,824
562	SG				1,088,119,808	282,930,313	1,381,706,919	359,268,132
563	SE				1,044,391,607	260,263,847	1,089,033,841	271,388,755
564	SNPPH				-	-	-	-
565	TROJP				-	-	-	-
566	SGCT				-	-	-	-
567	DGP				-	-	-	-
568	DEU				-	-	-	-
569	DEP				-	-	-	-
570	SNPPS				-	-	-	-
571	SNPPO				-	-	-	-
572	DGU				-	-	-	-
573	MC				-	-	-	-
574	SSGCT				-	-	-	-
575	SSECT				-	-	-	-
576	SSGC				-	-	-	-
577	SSGCH				-	-	-	-
578	SSECH				-	-	-	-
579	Total Production Expense by Factor				2,150,248,373	540,576,435	2,481,864,323	631,371,711
580	560 Operation Supervision & Engineering							
581	T		SG		8,985,016	2,336,262	9,529,117	2,477,738
582	T		SG		-	-	(956)	(248)
583								
584				<b>B2</b>	<b>8,985,016</b>	<b>2,336,262</b>	<b>9,528,161</b>	<b>2,477,490</b>
585								
586	561 Load Dispatching							
587	T		SG		17,775,685	4,621,991	18,919,491	4,919,401
588	T		SG		-	-	(152)	(40)
589								
590				<b>B2</b>	<b>17,775,685</b>	<b>4,621,991</b>	<b>18,919,338</b>	<b>4,919,361</b>
591	562 Station Expense							
592	T		SG		3,230,138	839,893	3,440,170	894,505
593	T		SG		-	-	-	-
594								
595				<b>B2</b>	<b>3,230,138</b>	<b>839,893</b>	<b>3,440,170</b>	<b>894,505</b>
596								
597	563 Overhead Line Expense							
598	T		SG		961,278	249,949	1,023,883	266,228
599	T		SG		-	-	-	-
600								
601				<b>B2</b>	<b>961,278</b>	<b>249,949</b>	<b>1,023,883</b>	<b>266,228</b>
602								
603	564 Underground Line Expense							
604	T		SG		-	-	-	-
605								
606				<b>B2</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
607								
608	565 Transmission of Electricity by Others							
609	T		SG		-	-	-	-
610	T		SE		-	-	-	-
611								
612								
613	565NPC Transmission of Electricity by Others-NPC							
614	T		SG		133,395,046	34,685,061	148,428,446	38,594,010
615	T		SE		15,971,607	3,980,147	6,893,033	1,717,753
616					149,366,653	38,665,208	155,321,479	40,311,763
617								
618	Total Transmission of Electricity by Others			<b>B2</b>	<b>149,366,653</b>	<b>38,665,208</b>	<b>155,321,479</b>	<b>40,311,763</b>

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
619								
620	566	Misc. Transmission Expense						
621		T	SG		3,609,107	938,431	3,864,103	1,004,735
622		T	SG		-	-	(4,743,194)	(1,233,314)
623								
624				B2	<u>3,609,107</u>	<u>938,431</u>	<u>(879,091)</u>	<u>(228,579)</u>
625								
626	567	Rents - Transmission						
627		T	SG		2,481,704	645,287	2,656,501	690,737
628		T	SG		-	-	-	-
629								
630				B2	<u>2,481,704</u>	<u>645,287</u>	<u>2,656,501</u>	<u>690,737</u>
631								
632	568	Maint Supervision & Engineering						
633		T	SG		845,051	219,728	891,703	231,858
634		T	SG		-	-	-	-
635								
636				B2	<u>845,051</u>	<u>219,728</u>	<u>891,703</u>	<u>231,858</u>
637								
638	569	Maintenance of Structures						
639		T	SG		5,239,955	1,362,481	5,813,214	1,511,538
640		T	SG		-	-	-	-
641								
642				B2	<u>5,239,955</u>	<u>1,362,481</u>	<u>5,813,214</u>	<u>1,511,538</u>
643								
644	570	Maintenance of Station Equipment						
645		T	SG		10,323,490	2,684,289	11,360,549	2,953,943
646		T	SG		-	-	(0)	(0)
647								
648				B2	<u>10,323,490</u>	<u>2,684,289</u>	<u>11,360,549</u>	<u>2,953,943</u>
649								
650	571	Maintenance of Overhead Lines						
651		T	SG		17,662,920	4,592,670	20,189,666	5,249,669
652		T	SG		-	-	781,983	203,329
653								
654				B2	<u>17,662,920</u>	<u>4,592,670</u>	<u>20,971,648</u>	<u>5,452,998</u>
655								
656	572	Maintenance of Underground Lines						
657		T	SG		169,970	44,195	192,544	50,065
658		T	SG		-	-	-	-
659								
660				B2	<u>169,970</u>	<u>44,195</u>	<u>192,544</u>	<u>50,065</u>
661								
662	573	Maint of Misc. Transmission Plant						
663		T	SG		177,081	46,044	206,156	53,604
664		T	SG		-	-	-	-
665								
666				B2	<u>177,081</u>	<u>46,044</u>	<u>206,156</u>	<u>53,604</u>
667								
668		<b>Total Transmission Expense</b>		<b>B2</b>	<b><u>220,828,048</u></b>	<b><u>57,246,429</u></b>	<b><u>229,446,255</u></b>	<b><u>59,585,511</u></b>
669								
670		Summary of Transmission Expense by Factor						
671		SE			15,971,607	3,980,147	6,893,033	1,717,753
672		SG			204,856,441	53,266,282	222,553,222	57,867,757
673		SNPT			-	-	-	-
674		<b>Total Transmission Expense by Factor</b>			<b><u>220,828,048</u></b>	<b><u>57,246,429</u></b>	<b><u>229,446,255</u></b>	<b><u>59,585,511</u></b>
675	580	Operation Supervision & Engineering						
676		DPW	S		1,694,447	430,541	1,822,906	457,261
677		DPW	SNPD		8,121,601	2,149,999	8,623,390	2,282,835
678				B2	<u>9,816,048</u>	<u>2,580,540</u>	<u>10,446,295</u>	<u>2,740,096</u>
679								
680	581	Load Dispatching						
681		DPW	S		-	-	-	-
682		DPW	SNPD		12,715,437	3,366,106	13,471,965	3,566,379
683				B2	<u>12,715,437</u>	<u>3,366,106</u>	<u>13,471,965</u>	<u>3,566,379</u>
684								
685	582	Station Expense						
686		DPW	S		4,235,076	1,104,470	4,577,536	1,198,280
687		DPW	SNPD		17,180	4,548	18,778	4,971
688				B2	<u>4,252,256</u>	<u>1,109,018</u>	<u>4,596,314</u>	<u>1,203,251</u>
689								
690	583	Overhead Line Expenses						
691		DPW	S		9,361,055	1,780,369	9,997,435	1,903,111
692		DPW	SNPD		166	44	176	47
693				B2	<u>9,361,221</u>	<u>1,780,413</u>	<u>9,997,612</u>	<u>1,903,158</u>
694								
695	584	Underground Line Expense						
696		DPW	S		417	417	456	456
697		DPW	SNPD		-	-	-	-
698				B2	<u>417</u>	<u>417</u>	<u>456</u>	<u>456</u>
699								
700	585	Street Lighting & Signal Systems						
701		DPW	S		-	-	-	-
702		DPW	SNPD		323,751	85,705	345,562	91,479
703				B2	<u>323,751</u>	<u>85,705</u>	<u>345,562</u>	<u>91,479</u>

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End			UNADJUSTED RESULTS		NORMALIZED RESULTS			
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
704								
705	586	Meter Expenses						
706		DPW	S		2,750,524	1,272,828	2,934,044	1,357,738
707		DPW	SNPD		-	-	-	-
708				B2	<u>2,750,524</u>	<u>1,272,828</u>	<u>2,934,044</u>	<u>1,357,738</u>
709								
710	587	Customer Installation Expenses						
711		DPW	S		16,553,911	6,350,268	17,680,956	6,776,917
712		DPW	SNPD		-	-	-	-
713				B2	<u>16,553,911</u>	<u>6,350,268</u>	<u>17,680,956</u>	<u>6,776,917</u>
714								
715	588	Misc. Distribution Expenses						
716		DPW	S		415,049	(115,145)	450,775	(123,652)
717		DPW	SNPD		662,605	175,409	636,357	168,460
718				B2	<u>1,077,654</u>	<u>60,263</u>	<u>1,087,131</u>	<u>44,808</u>
719								
720	589	Rents						
721		DPW	S		3,526,824	1,872,042	3,840,964	2,045,852
722		DPW	SNPD		25,331	6,706	27,737	7,343
723				B2	<u>3,552,155</u>	<u>1,878,748</u>	<u>3,868,702</u>	<u>2,053,195</u>
724								
725	590	Maint Supervision & Engineering						
726		DPW	S		2,797,810	822,012	3,002,937	884,417
727		DPW	SNPD		2,560,779	677,905	2,702,961	715,544
728				B2	<u>5,358,589</u>	<u>1,499,917</u>	<u>5,705,897</u>	<u>1,599,961</u>
729								
730	591	Maintenance of Structures						
731		DPW	S		1,756,099	500,380	2,050,577	584,288
732		DPW	SNPD		59,698	15,804	69,663	18,442
733				B2	<u>1,815,797</u>	<u>516,184</u>	<u>2,120,240</u>	<u>602,730</u>
734								
735	592	Maintenance of Station Equipment						
736		DPW	S		7,199,867	2,722,618	7,841,457	2,963,425
737		DPW	SNPD		1,565,281	414,371	1,681,961	445,259
738				B2	<u>8,765,148</u>	<u>3,136,989</u>	<u>9,523,417</u>	<u>3,408,683</u>
739	593	Maintenance of Overhead Lines						
740		DPW	S		110,312,452	55,025,939	139,186,220	79,890,862
741		DPW	SNPD		2,450,344	648,670	3,321,157	879,196
742				B2	<u>112,762,796</u>	<u>55,674,609</u>	<u>142,507,377</u>	<u>80,770,059</u>
743								
744	594	Maintenance of Underground Lines						
745		DPW	S		28,989,233	7,107,330	32,474,276	7,878,812
746		DPW	SNPD		23,258	6,157	25,170	6,663
747				B2	<u>29,012,491</u>	<u>7,113,487</u>	<u>32,499,445</u>	<u>7,885,475</u>
748								
749	595	Maintenance of Line Transformers						
750		DPW	S		-	-	-	-
751		DPW	SNPD		1,101,111	291,493	1,181,897	312,879
752				B2	<u>1,101,111</u>	<u>291,493</u>	<u>1,181,897</u>	<u>312,879</u>
753								
754	596	Maint of Street Lighting & Signal Sys.						
755		DPW	S		1,868,303	689,285	2,074,677	757,247
756		DPW	SNPD		-	-	-	-
757				B2	<u>1,868,303</u>	<u>689,285</u>	<u>2,074,677</u>	<u>757,247</u>
758								
759	597	Maintenance of Meters						
760		DPW	S		691,372	214,424	749,807	231,678
761		DPW	SNPD		26,553	7,029	38,579	10,213
762				B2	<u>717,925</u>	<u>221,454</u>	<u>788,386</u>	<u>241,891</u>
763								
764	598	Maint of Misc. Distribution Plant						
765		DPW	S		1,430,122	(249,709)	1,663,888	(294,111)
766		DPW	SNPD		4,553,196	1,205,349	5,486,001	1,452,287
767				B2	<u>5,983,318</u>	<u>955,640</u>	<u>7,149,888</u>	<u>1,158,176</u>
768								
769		<b>Total Distribution Expense</b>		<b>B2</b>	<b><u>227,788,851</u></b>	<b><u>88,583,363</u></b>	<b><u>267,980,263</u></b>	<b><u>116,474,578</u></b>
770								
771								
772		Summary of Distribution Expense by Factor						
773		S			193,582,559	79,528,070	230,348,909	106,512,581
774		SNPD			34,206,291	9,055,294	37,631,353	9,961,997
775								
776		Total Distribution Expense by Factor			<u>227,788,851</u>	<u>88,583,363</u>	<u>267,980,263</u>	<u>116,474,578</u>
777								
778	901	Supervision						
779		CUST	S		615	-	684	-
780		CUST	CN		2,256,716	699,355	2,420,508	750,114
781				B2	<u>2,257,332</u>	<u>699,355</u>	<u>2,421,192</u>	<u>750,114</u>

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
782								
783	902	Meter Reading Expense						
784		CUST	S		12,882,743	2,311,692	13,826,412	2,496,921
785		CUST	CN		388,569	120,417	416,236	128,991
786				B2	<u>13,271,313</u>	<u>2,432,109</u>	<u>14,242,648</u>	<u>2,625,912</u>
787								
788	903	Customer Receipts & Collections						
789		CUST	S		3,369,238	765,765	3,624,872	819,548
790		CUST	CN		39,229,538	12,157,206	42,306,883	13,110,873
791				B2	<u>42,598,776</u>	<u>12,922,971</u>	<u>45,931,755</u>	<u>13,930,421</u>
792								
793	904	Uncollectible Accounts						
794		CUST	S		11,886,522	5,916,318	12,922,669	6,286,577
795		P	SG		-	-	-	-
796		CUST	CN		141,303	43,790	157,064	48,674
797				B2	<u>12,027,825</u>	<u>5,960,108</u>	<u>13,079,733</u>	<u>6,335,251</u>
798								
799	905	Misc. Customer Accounts Expense						
800		CUST	S		-	-	-	-
801		CUST	CN		25,493	7,900	28,337	8,781
802				B2	<u>25,493</u>	<u>7,900</u>	<u>28,337</u>	<u>8,781</u>
803								
804		<b>Total Customer Accounts Expense</b>		B2	<b><u>70,180,739</u></b>	<b><u>22,022,443</u></b>	<b><u>75,703,664</u></b>	<b><u>23,650,478</u></b>
805								
806		Summary of Customer Accts Exp by Factor						
807		S			28,139,119	8,993,775	30,374,637	9,603,045
808		CN			42,041,620	13,028,668	45,329,027	14,047,433
809		SG			-	-	-	-
810		<b>Total Customer Accounts Expense by Factor</b>			<b><u>70,180,739</u></b>	<b><u>22,022,443</u></b>	<b><u>75,703,664</u></b>	<b><u>23,650,478</u></b>
811								
812	907	Supervision						
813		CUST	S		-	-	-	-
814		CUST	CN		2,906	900	3,083	955
815				B2	<u>2,906</u>	<u>900</u>	<u>3,083</u>	<u>955</u>
816								
817	908	Customer Assistance						
818		CUST	S		109,367,868	3,471,925	120,330,486	2,367,268
819		CUST	CN		2,019,273	625,771	2,145,668	664,941
820								
821								
822				B2	<u>111,387,142</u>	<u>4,097,696</u>	<u>122,476,154</u>	<u>3,032,209</u>
823								
824	909	Informational & Instructional Adv						
825		CUST	S		1,954,258	679,790	2,279,072	809,790
826		CUST	CN		2,683,338	831,564	2,738,486	848,655
827				B2	<u>4,637,595</u>	<u>1,511,354</u>	<u>5,017,558</u>	<u>1,658,445</u>
828								
829	910	Misc. Customer Service						
830		CUST	S		-	-	-	-
831		CUST	CN		1,766	547	1,971	611
832								
833				B2	<u>1,766</u>	<u>547</u>	<u>1,971</u>	<u>611</u>
834								
835		<b>Total Customer Service Expense</b>		B2	<b><u>116,029,408</u></b>	<b><u>5,610,498</u></b>	<b><u>127,498,765</u></b>	<b><u>4,692,219</u></b>
836								
837								
838		Summary of Customer Service Exp by Factor						
839		S			111,322,126	4,151,715	122,609,558	3,177,058
840		CN			4,707,282	1,458,783	4,889,207	1,515,162
841								
842		<b>Total Customer Service Expense by Factor</b>		B2	<b><u>116,029,408</u></b>	<b><u>5,610,498</u></b>	<b><u>127,498,765</u></b>	<b><u>4,692,219</u></b>
843								
844								
845	911	Supervision						
846		CUST	S		-	-	-	-
847		CUST	CN		-	-	-	-
848				B2	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
849								
850	912	Demonstration & Selling Expense						
851		CUST	S		-	-	-	-
852		CUST	CN		-	-	-	-
853				B2	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
854								
855	913	Advertising Expense						
856		CUST	S		-	-	-	-
857		CUST	CN		-	-	-	-
858				B2	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC ACCT	DESCRIP	BUS FUNC	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
859								
860	916	Misc. Sales Expense						
861		CUST	S		-	-	-	-
862		CUST	CN		-	-	-	-
863				B2	-	-	-	-
864					-	-	-	-
865		<b>Total Sales Expense</b>		B2	-	-	-	-
866								
867								
868		Total Sales Expense by Factor						
869		S			-	-	-	-
870		CN			-	-	-	-
871		Total Sales Expense by Factor			-	-	-	-
872								
873		<b>Total Customer Service Exp Including Sales</b>		B2	<b>116,029,408</b>	<b>5,610,498</b>	<b>127,498,765</b>	<b>4,692,219</b>
874	920	Administrative & General Salaries						
875		PTD	S		2,285,428	702,610	2,412,880	741,792
876		CUST	CN		-	-	-	-
877		PTD	SO		76,467,813	20,742,055	81,063,253	21,988,577
878				B2	78,753,241	21,444,664	83,476,133	22,730,370
879								
880	921	Office Supplies & expenses						
881		PTD	S		2,345,814	1,810,997	2,587,107	2,005,777
882		CUST	CN		87,451	27,101	95,056	29,458
883		PTD	SO		8,230,193	2,232,457	10,241,929	2,778,145
884				B2	10,663,458	4,070,555	12,924,091	4,813,380
885								
886	922	A&G Expenses Transferred						
887		PTD	S		-	-	-	-
888		CUST	CN		-	-	-	-
889		PTD	SO		(37,446,530)	(10,157,450)	(39,830,036)	(10,803,981)
890				B2	(37,446,530)	(10,157,450)	(39,830,036)	(10,803,981)
891								
892	923	Outside Services						
893		PTD	S		1,045,345	229,797	1,124,131	247,116
894		CUST	CN		-	-	-	-
895		PTD	SO		22,722,700	6,163,580	24,435,278	6,628,120
896				B2	23,768,045	6,393,377	25,559,409	6,875,236
897								
898	924	Property Insurance						
899		PT	S		11,665,617	7,448,035	16,063,652	11,846,070
900		PT	SG		-	-	-	-
901		PTD	SO		4,371,510	1,185,781	3,612,548	979,911
902				B2	16,037,127	8,633,816	19,676,200	12,825,981
903								
904	925	Injuries & Damages						
905		PTD	S		1,484,743	1,484,743	1,605,846	1,605,846
906		PTD	SO		151,600,598	41,121,980	33,047,771	8,964,277
907				B2	153,085,341	42,606,723	34,653,618	10,570,124
908								
909	926	Employee Pensions & Benefits						
910		LABOR	S		5,664,605	163,978	6,040,248	174,852
911		CUST	CN		-	-	-	-
912		LABOR	SO		114,566,722	31,076,464	126,008,606	34,180,099
913				B2	120,231,327	31,240,442	132,048,853	34,354,951
914								
915	927	Franchise Requirements						
916		DMSC	S		-	-	-	-
917		DMSC	SO		-	-	-	-
918				B2	-	-	-	-
919								
920	928	Regulatory Commission Expense						
921		DMSC	S		18,139,814	5,799,002	19,768,520	6,137,001
922		P	SE		-	-	-	-
923		DMSC	SO		2,239,683	607,519	2,467,259	669,249
924		FERC	SG		4,289,878	1,115,444	4,756,583	1,236,795
925				B2	24,669,376	7,521,965	26,992,362	8,043,046
926								
927	929	Duplicate Charges						
928		LABOR	S		-	-	-	-
929		LABOR	SO		(124,736,799)	(33,835,119)	(125,408,289)	(34,017,261)
930				B2	(124,736,799)	(33,835,119)	(125,408,289)	(34,017,261)
931								
932	930	Misc General Expenses						
933		PTD	S		21,320	130	(1,647,201)	(1,669,716)
934		CUST	CN		-	-	-	-
935		P	SG		-	-	-	-
936		LABOR	SO		2,246,757	609,438	1,816,578	492,750
937				B2	2,268,077	609,568	169,377	(1,176,966)

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC ACCT	DESCRIP	BUS FUNC	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
938								
939	931	Rents						
940			PTD	S	1,032,000	454,841	1,132,547	499,156
941			PTD	SO	2,060,717	558,974	2,261,492	613,434
942				B2	3,092,716	1,013,815	3,394,039	1,112,590
943								
944	935	Maintenance of General Plant						
945			G	S	392,947	149,681	427,704	162,835
946			CUST	CN	27,697	8,583	30,187	9,355
947			G	SO	26,118,338	7,084,654	28,403,885	7,704,613
948				B2	26,538,982	7,242,918	28,861,776	7,876,803
949								
950		<b>Total Administrative &amp; General Expense</b>		<b>B2</b>	<b>296,924,361</b>	<b>86,785,274</b>	<b>202,517,533</b>	<b>63,204,272</b>
951								
952		Summary of A&G Expense by Factor						
953		S			44,077,632	18,243,813	49,515,435	21,750,730
954		SE			-	-	-	-
955		SO			248,441,702	67,390,333	148,120,273	40,177,935
956		SG			4,289,878	1,115,444	4,756,583	1,236,795
957		CN			115,148	35,684	125,243	38,813
958		<b>Total A&amp;G Expense by Factor</b>			<b>296,924,361</b>	<b>86,785,274</b>	<b>202,517,533</b>	<b>63,204,272</b>
959								
960		<b>Total O&amp;M Expense</b>		<b>B2</b>	<b>3,081,999,779</b>	<b>800,824,443</b>	<b>3,385,010,804</b>	<b>898,978,769</b>
961	403SP	Steam Depreciation						
		P		S	180,756,088	-	180,756,088	-
962			P	SG	40,420,413	10,510,019	40,420,413	10,510,019
963			P	SG	33,611,594	8,739,606	33,611,594	8,739,606
964			P	SG	223,954,796	58,232,191	364,113,614	94,675,952
965			P	SG	7,589,695	1,973,454	7,589,695	1,973,454
966				B3	486,332,585	79,455,271	626,491,403	115,899,032
967								
968	403NP	Nuclear Depreciation						
969		P		SG	-	-	-	-
970				B3	-	-	-	-
971								
972	403HP	Hydro Depreciation						
973		P		SG	(24,185,191)	(6,288,576)	(24,185,191)	(6,288,576)
974		P		SG	1,348,641	350,670	1,348,641	350,670
975		P		SG	46,696,890	12,142,014	48,566,570	12,628,163
976		P		SG	6,934,787	1,803,167	8,780,939	2,283,199
977		P		SG	-	-	-	-
978				B3	30,795,127	8,007,275	34,510,958	8,973,457
979								
980	403OP	Other Production Depreciation						
981		p		S	4,783	-	4,783	-
982		P		SG	-	-	-	-
983		P		SG	65,951,638	17,148,587	69,147,316	17,979,520
984		P		SG	3,697,797	961,492	3,697,797	961,492
985		P		SG	97,958,758	25,471,002	137,093,159	35,646,636
986				B3	167,612,977	43,581,082	209,943,056	54,587,648
987								
988	403TP	Transmission Depreciation						
989		T		SG	8,458,141	2,199,266	8,458,141	2,199,266
990		T		SG	10,613,292	2,759,643	10,613,292	2,759,643
991		T		SG	106,315,401	27,643,877	119,128,148	30,975,416
992				B3	125,386,834	32,602,785	138,199,580	35,934,325
993								
994								
995								
996	403	Distribution Depreciation						
997	360	Land & Land Rights	DPW	S	420,462	61,427	664,106	69,299
998	361	Structures	DPW	S	2,158,154	544,558	2,620,006	559,481
999	362	Station Equipment	DPW	S	12,341,072	6,154,345	16,173,237	6,278,171
1000	363	Storage Battery Equip	DPW	S	-	-	-	-
1001	364	Poles & Towers	DPW	S	45,813,613	13,885,875	50,821,831	14,047,702
1002	365	OH Conductors	DPW	S	20,782,723	6,876,026	23,934,218	6,977,858
1003	366	UG Conduit	DPW	S	9,700,542	1,945,136	11,264,100	1,995,658
1004	367	UG Conductor	DPW	S	21,530,296	4,183,811	25,177,761	4,301,669
1005	368	Line Trans	DPW	S	35,711,989	11,543,624	41,229,818	11,718,798
1006	369	Services	DPW	S	20,733,655	6,967,771	24,147,742	7,078,088
1007	370	Meters	DPW	S	9,771,798	2,573,927	10,706,351	2,604,125
1008	371	Inst Cust Prem	DPW	S	478,452	121,725	510,764	122,769
1009	372	Leased Property	DPW	S	-	-	-	-
1010	373	Street Lighting	DPW	S	2,248,401	663,724	2,479,804	671,201
1011				B3	181,691,155	55,521,949	209,729,737	56,424,821





2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
1092	404HP	Amortization of Other Electric Plant						
1093		P	SG		311,696	81,046	311,696	81,046
1094		P	SG		-	-	-	-
1095		P	SG		-	-	-	-
1096				B4	311,696	81,046	311,696	81,046
1097								
1098	<b>Total Amortization of Limited Term Plant</b>			<b>B4</b>	<b>52,488,428</b>	<b>13,528,692</b>	<b>58,576,334</b>	<b>15,312,540</b>
1099								
1100								
1101	405	Amortization of Other Electric Plant						
1102		GP	S		-	-	-	-
1103								
1104				B4	-	-	-	-
1105								
1106	406	Amortization of Plant Acquisition Adj						
1107		P	S		301,635	-	301,635	-
1108		P	SG		-	-	-	-
1109		P	SG		-	-	-	-
1110		P	SG		6,496,204	1,689,127	1,789,996	465,430
1111		P	SO		-	-	-	-
1112				B4	6,797,839	1,689,127	2,091,631	465,430
1113	407	Amort of Prop Losses, Unrec Plant, etc						
1114		DPW	S		2,513,687	1,057,340	19,785,532	18,329,186
1115		GP	SO		-	-	-	-
1116		P	SG-P		-	-	-	-
1117		P	SE		-	-	-	-
1118		P	SG		23,824	6,195	961,656	250,048
1119		P	TROJP		-	-	-	-
1120				B4	2,537,511	1,063,535	20,747,188	18,579,233
1121								
1122	<b>Total Amortization Expense</b>			<b>B4</b>	<b>61,823,778</b>	<b>16,281,354</b>	<b>81,415,153</b>	<b>34,357,204</b>
1123								
1124								
1125								
1126	Summary of Amortization Expense by Factor							
1127		S			7,676,686	1,362,750	24,979,085	18,663,777
1128		SE			1,821	454	(12,865)	(3,206)
1129		TROJP			-	-	-	-
1130		DGP			-	-	-	-
1131		DGU			-	-	-	-
1132		SO			14,653,009	3,974,659	29,457,043	7,990,285
1133		SSGCT			-	-	-	-
1134		SSGCH			-	-	-	-
1135		CN			13,528,148	4,192,364	13,792,251	4,274,209
1136		SG			25,964,114	6,751,127	13,199,639	3,432,139
1137	Total Amortization Expense by Factor				61,823,778	16,281,354	81,415,153	34,357,204
1138	408	Taxes Other Than Income						
1139		DMSC	S		33,900,676	30,692,497	38,245,766	35,037,586
1140		GP	GPS		161,965,403	43,933,455	185,977,000	50,446,651
1141		GP	SO		13,226,755	3,587,785	13,226,755	3,587,785
1142		P	SE		871,530	217,187	871,530	217,187
1143		P	SG		2,232,349	580,450	2,151,801	559,506
1144		DMSC	OPRV-ID		-	-	-	-
1145		GP	EXCTAX		-	-	-	-
1146		GP	SG		-	-	-	-
1147								
1148								
1149								
1150	<b>Total Taxes Other Than Income</b>			<b>B5</b>	<b>212,196,714</b>	<b>79,011,374</b>	<b>240,472,853</b>	<b>89,848,715</b>
1151								
1152								
1153	41140	Deferred Investment Tax Credit - Fed						
1154		PTD	DGU		(1,703,368)	-	(1,055,733)	-
1155								
1156				B7	(1,703,368)	-	(1,055,733)	-
1157								
1158	41141	Deferred Investment Tax Credit - Idaho						
1159		PTD	DGU		-	-	-	-
1160								
1161				B7	-	-	-	-
1162								
1163	<b>Total Deferred ITC</b>			<b>B7</b>	<b>(1,703,368)</b>	<b>-</b>	<b>(1,055,733)</b>	<b>-</b>
1164								
1165								
1166	427	Interest on Long-Term Debt						
1167		GP	S		413,116,218	111,149,153	374,239,394	97,867,394
1168		GP	SNP		-	-	-	-
1169				B6	413,116,218	111,149,153	374,239,394	97,867,394

2020 PROTOCOL						JUNE 2021		DECEMBER 2023	
Year End						UNADJUSTED RESULTS		NORMALIZED RESULTS	
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON	
ACCT		FUNC							
1170									
1171	428	Amortization of Debt Disc & Exp							
1172		GP	SNP		5,103,007	1,303,749	5,103,007	1,303,749	
1173				B6	5,103,007	1,303,749	5,103,007	1,303,749	
1174									
1175	429	Amortization of Premium on Debt							
1176		GP	SNP		(11,026)	(2,817)	(11,026)	(2,817)	
1177				B6	(11,026)	(2,817)	(11,026)	(2,817)	
1178									
1179	431	Other Interest Expense							
1180		NUTIL	OTH		-	-	-	-	
1181		GP	SO		-	-	-	-	
1182		GP	SNP		18,548,860	4,738,980	18,552,610	4,739,938	
1183				B6	18,548,860	4,738,980	18,552,610	4,739,938	
1184									
1185	432	AFUDC - Borrowed							
1186		GP	SNP		(38,314,971)	(9,788,951)	(38,314,971)	(9,788,951)	
1187					(38,314,971)	(9,788,951)	(38,314,971)	(9,788,951)	
1188									
1189		Total Elec. Interest Deductions for Tax		B6	398,442,089	107,400,113	359,569,015	94,119,313	
1190									
1191		Non-Regulated Portion of Interest							
1192		427 NUTIL	NUTIL		-	-	-	-	
1193		428 NUTIL	NUTIL		-	-	-	-	
1194		429 NUTIL	NUTIL		-	-	-	-	
1195		431 NUTIL	NUTIL		-	-	-	-	
1196									
1197		Total Non-Regulated Interest			-	-	-	-	
1198									
1199		Total Interest Deductions for Tax		B6	398,442,089	107,400,113	359,569,015	94,119,313	
1200									
1201									
1202	419	Interest & Dividends							
1203		GP	S		-	-	-	-	
1204		GP	SNP		(79,165,909)	(20,225,807)	(83,426,872)	(21,314,425)	
1205		Total Operating Deductions for Tax		B6	(79,165,909)	(20,225,807)	(83,426,872)	(21,314,425)	
1206									
1207									
1208	41010	Deferred Income Tax - Federal-DR							
1209		GP	S		309,752	186,017	(5,230,180)	370,078	
1210		P	TROJD		-	-	-	-	
1211		PT	SG		510,498	132,738	510,498	132,738	
1212		LABOR	SO		(19,941,046)	(5,409,051)	6,619,626	1,795,587	
1213		GP	SNP		28,884,552	7,379,608	29,009,377	7,411,499	
1214		P	SE		(281,840)	(70,235)	37,622	9,375	
1215		PT	SG		37,571,837	9,769,339	34,140,395	8,877,104	
1216		GP	GPS		49,230,998	13,354,012	12,039,020	3,265,609	
1217		DITEXP	DITEXP		-	-	-	-	
1218		CUST	BADDEBT		-	-	-	-	
1219		CUST	CN		-	-	-	-	
1220		IBT	IBT		-	-	-	-	
1221		DPW	CIAC		-	-	-	-	
1222		GP	SCHMDEXP		-	-	-	-	
1223		TAXDEPR	TAXDEPR		301,248,033	79,558,685	337,481,784	89,127,908	
1224		DPW	SNPD		238,377	63,105	-	-	
1225				B7	397,771,161	104,964,218	414,608,142	110,989,899	
1226									
1227									
1228									
1229	41110	Deferred Income Tax - Federal-CR							
1230		GP	S		(181,173,017)	(60,241,301)	(129,587,123)	(18,571,089)	
1231		P	SE		(9,598,996)	(2,392,083)	(4,161,684)	(1,037,097)	
1232		PT	SG		(1,109,267)	(288,429)	(1,109,267)	(288,429)	
1233		GP	SNP		(17,992,952)	(4,596,953)	(17,516,892)	(4,475,326)	
1234		PT	SG		(680,477)	(176,936)	(579,991)	(150,808)	
1235		GP	GPS		1,212,047	328,770	-	-	
1236		LABOR	SO		(10,150,835)	(2,753,435)	(4,484,432)	(1,216,411)	
1237		PT	SNPD		(937,677)	(248,227)	-	-	
1238		CUST	BADDEBT		(873,780)	(423,221)	(0)	(0)	
1239		P	SG		-	-	-	-	
1240		DITEXP	SG		-	-	-	-	
1241		P	TROJD		11,239	2,901	(1)	(0)	
1242		IBT	CN		-	-	11,988	3,715	
1243		DPW	CIAC		(29,968,119)	(7,933,339)	(21,049,481)	(5,572,344)	
1244		GP	SCHMDEXP		(211,410,319)	(47,779,250)	(288,024,556)	(65,094,255)	
1245		TAXDEPR	TAXDEPR		-	-	-	-	
1246				B7	(462,672,154)	(126,501,505)	(466,501,438)	(96,402,045)	
1247									
1248		Total Deferred Income Taxes		B7	(64,900,993)	(21,537,286)	(51,893,297)	14,587,854	



2020 PROTOCOL					JUNE 2021		DECEMBER 2023	
Year End	FERC	BUS	FACTOR	Ref	UNADJUSTED RESULTS		NORMALIZED RESULTS	
ACCT	DESCRIP	FUNC			TOTAL	OREGON	TOTAL	OREGON
1329	Calculation of Taxable Income:							
1330	Operating Revenues				5,521,910,467	1,434,457,180	5,673,991,400	1,429,069,113
1331	Operating Deductions:							
1332	O & M Expenses				3,081,999,779	800,824,443	3,385,010,804	898,978,769
1333	Depreciation Expense				1,035,081,277	232,134,017	1,271,204,884	287,295,417
1334	Amortization Expense				61,823,778	16,281,354	81,415,153	34,357,204
1335	Taxes Other Than Income				212,196,714	79,011,374	240,472,853	89,848,715
1336	Interest & Dividends (AFUDC-Equity)				(79,165,909)	(20,225,807)	(83,426,872)	(21,314,425)
1337	Misc Revenue & Expense				(1,733,836)	(98,098)	(1,503,560)	4,502
1338	Total Operating Deductions				4,310,201,804	1,107,927,283	4,893,173,261	1,289,170,182
1339	Other Deductions:							
1340	Interest Deductions				398,442,089	107,400,113	359,569,015	94,119,313
1341	Interest on PCRBS				-	-	-	-
1342	Schedule M Adjustments				(362,919,488)	(22,838,022)	(373,362,779)	(126,566,024)
1343								
1344	Income Before State Taxes				450,347,086	196,291,762	47,886,345	(80,786,407)
1345								
1346	State Income Taxes				24,994,902	8,911,646	17,921,046	(3,423,104)
1347								
1348	Total Taxable Income				425,352,184	187,380,116	29,965,299	(77,363,303)
1349								
1350	Tax Rate				21.0%	21.0%	21.0%	21.0%
1351								
1352	Federal Income Tax - Calculated				89,323,959	39,349,824	6,292,713	(16,246,294)
1353								
1354	Adjustments to Calculated Tax:							
1355	40910	P	SE		(45,220)	(11,269)	(17,000)	(4,236)
1356	40910	PTC	P	SG	(125,906,829)	(32,737,993)	(203,036,306)	(52,793,015)
1357	40910	P	SO		(1,659)	(450)	-	-
1358	40910	IRS Settle	LABOR	S	-	-	-	-
1359	Federal Income Tax Expense				(36,629,750)	6,600,112	(196,760,593)	(69,043,545)
1360								
1361	Total Operating Expenses				4,311,128,503	1,122,127,562	4,744,811,557	1,252,605,813
1362	310	Land and Land Rights						
1363		P	SG		2,327,033	605,070	2,327,033	605,070
1364		P	SG		33,837,468	8,798,338	33,837,468	8,798,338
1365		P	SG		54,188,889	14,090,065	54,188,889	14,090,065
1366		P	S		-	-	-	-
1367		P	SG		1,266,851	329,404	1,266,851	329,404
1368				B8	91,620,242	23,822,876	91,620,242	23,822,876
1369								
1370	311	Structures and Improvements						
1371		P	SG		226,302,042	58,842,516	226,302,042	58,842,516
1372		P	SG		313,179,657	81,432,226	313,179,657	81,432,226
1373		P	SG		458,329,586	119,173,764	458,329,586	119,173,764
1374		P	SG		-	-	-	-
1375				B8	997,811,285	259,448,507	997,811,285	259,448,507
1376								
1377	312	Boiler Plant Equipment						
1378		P	SG		586,722,706	152,558,236	586,722,706	152,558,236
1379		P	SG		464,967,271	120,899,679	464,967,271	120,899,679
1380		P	SG		3,285,513,183	854,291,289	3,347,065,168	870,295,889
1381		P	SG		-	-	-	-
1382				B8	4,337,203,161	1,127,749,205	4,398,755,145	1,143,753,805
1383								
1384	314	Turbogenerator Units						
1385		P	SG		109,027,524	28,349,076	109,027,524	28,349,076
1386		P	SG		109,153,256	28,381,769	109,153,256	28,381,769
1387		P	SG		727,390,873	189,134,437	727,390,873	189,134,437
1388		P	SG		-	-	-	-
1389				B8	945,571,653	245,865,282	945,571,653	245,865,282
1390								
1391	315	Accessory Electric Equipment						
1392		P	SG		85,763,790	22,300,096	85,763,790	22,300,096
1393		P	SG		133,124,041	34,614,595	133,124,041	34,614,595
1394		P	SG		204,707,307	53,227,505	204,707,307	53,227,505
1395		P	SG		-	-	-	-
1396				B8	423,595,138	110,142,196	423,595,138	110,142,196
1397								
1398								
1399								
1400	316	Misc Power Plant Equipment						
1401		P	SG		2,348,343	610,611	2,348,343	610,611
1402		P	SG		4,912,823	1,277,420	4,912,823	1,277,420
1403		P	SG		23,737,398	6,172,142	23,737,398	6,172,142
1404		P	SG		-	-	-	-
1405				B8	30,998,565	8,060,173	30,998,565	8,060,173

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
1406								
1407	317	Steam Plant ARO						
1408		P	S		-	-	-	-
1409				B8	-	-	-	-
1410								
1411	SP	Unclassified Steam Plant - Account 300						
1412		P	SG		57,225,129	14,879,541	57,225,129	14,879,541
1413				B8	57,225,129	14,879,541	57,225,129	14,879,541
1414								
1415								
1416		<b>Total Steam Production Plant</b>		B8	<b>6,884,025,173</b>	<b>1,789,967,780</b>	<b>6,945,577,158</b>	<b>1,805,972,380</b>
1417								
1418								
1419		Summary of Steam Production Plant by Factor						
1420		S			-	-	-	-
1421		DGP			-	-	-	-
1422		DGU			-	-	-	-
1423		SG			6,884,025,173	1,789,967,780	6,945,577,158	1,805,972,380
1424		SSGCH			-	-	-	-
1425		Total Steam Production Plant by Factor			6,884,025,173	1,789,967,780	6,945,577,158	1,805,972,380
1426	320	Land and Land Rights						
1427		P	SG		-	-	-	-
1428		P	SG		-	-	-	-
1429				B8	-	-	-	-
1430								
1431	321	Structures and Improvements						
1432		P	SG		-	-	-	-
1433		P	SG	B8	-	-	-	-
1434					-	-	-	-
1435								
1436	322	Reactor Plant Equipment						
1437		P	SG		-	-	-	-
1438		P	SG		-	-	-	-
1439				B8	-	-	-	-
1440								
1441	323	Turbogenerator Units						
1442		P	SG		-	-	-	-
1443		P	SG		-	-	-	-
1444				B8	-	-	-	-
1445								
1446	324	Land and Land Rights						
1447		P	SG		-	-	-	-
1448		P	SG		-	-	-	-
1449				B8	-	-	-	-
1450								
1451	325	Misc. Power Plant Equipment						
1452		P	SG		-	-	-	-
1453		P	SG		-	-	-	-
1454				B8	-	-	-	-
1455								
1456								
1457	NP	Unclassified Nuclear Plant - Acct 300						
1458		P	SG		-	-	-	-
1459				B8	-	-	-	-
1460								
1461								
1462		<b>Total Nuclear Production Plant</b>		B8	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
1463								
1464								
1465								
1466		Summary of Nuclear Production Plant by Factor						
1467		DGP			-	-	-	-
1468		DGU			-	-	-	-
1469		SG			-	-	-	-
1470		Total Nuclear Plant by Factor			-	-	-	-
1471								
1472								
1473	330	Land and Land Rights						
1474		P	SG		10,332,372	2,686,599	10,332,372	2,686,599
1475		P	SG		5,268,322	1,369,856	5,268,322	1,369,856
1476		P	SG		21,965,016	5,711,291	21,965,016	5,711,291
1477		P	SG		1,316,755	342,379	1,316,755	342,379
1478				B8	38,882,464	10,110,125	38,882,464	10,110,125
1479								
1480	331	Structures and Improvements						
1481		P	SG		19,409,410	5,046,789	19,409,410	5,046,789
1482		P	SG		4,846,938	1,260,289	4,846,938	1,260,289
1483		P	SG		249,777,261	64,946,487	249,777,261	64,946,487
1484		P	SG		14,334,530	3,727,230	14,334,530	3,727,230
1485				B8	288,368,139	74,980,795	288,368,139	74,980,795

2020 PROTOCOL			JUNE 2021		DECEMBER 2023			
Year End	FERC		UNADJUSTED RESULTS		NORMALIZED RESULTS			
ACCT	DESCRIP	BUS FUNC	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
1486								
1487	332	Reservoirs, Dams & Waterways						
1488		P	SG		145,182,405	37,749,982	145,182,405	37,749,982
1489		P	SG		18,775,808	4,882,041	18,775,808	4,882,041
1490		P	SG		288,307,285	74,964,972	357,346,810	92,916,464
1491		P	SG		80,130,008	20,835,213	109,928,384	28,583,316
1492		0	SG		-	-	-	-
1493				B8	532,395,506	138,432,208	631,233,407	164,131,802
1494								
1495	333	Water Wheel, Turbines, & Generators						
1496		P	SG		28,717,970	7,467,178	28,717,970	7,467,178
1497		P	SG		6,749,763	1,755,057	6,749,763	1,755,057
1498		P	SG		67,204,973	17,474,476	67,204,973	17,474,476
1499		P	SG		43,566,039	11,327,937	43,566,039	11,327,937
1500				B8	146,238,745	38,024,649	146,238,745	38,024,649
1501								
1502	334	Accessory Electric Equipment						
1503		P	SG		3,653,216	949,900	3,653,216	949,900
1504		P	SG		3,335,903	867,394	3,335,903	867,394
1505		P	SG		67,845,688	17,641,074	67,845,688	17,641,074
1506		P	SG		11,197,573	2,911,566	11,197,573	2,911,566
1507				B8	86,032,381	22,369,934	86,032,381	22,369,934
1508								
1509								
1510								
1511	335	Misc. Power Plant Equipment						
1512		P	SG		1,129,697	293,741	1,129,697	293,741
1513		P	SG		153,991	40,040	153,991	40,040
1514		P	SG		1,261,938	328,126	1,261,938	328,126
1515		P	SG		18,279	4,753	18,279	4,753
1516				B8	2,563,904	666,660	2,563,904	666,660
1517								
1518	336	Roads, Railroads & Bridges						
1519		P	SG		4,363,451	1,134,574	4,363,451	1,134,574
1520		P	SG		734,401	190,957	734,401	190,957
1521		P	SG		18,843,685	4,899,690	18,843,685	4,899,690
1522		P	SG		2,333,429	606,733	2,333,429	606,733
1523				B8	26,274,965	6,831,954	26,274,965	6,831,954
1524								
1525	337	Hydro Plant ARO						
1526		P	S		-	-	-	-
1527				B8	-	-	-	-
1528								
1529	HP	Unclassified Hydro Plant - Acct 300						
1530		P	S		-	-	-	-
1531		P	SG		-	-	-	-
1532		P	SG		-	-	-	-
1533		P	SG		-	-	-	-
1534				B8	-	-	-	-
1535								
1536		<b>Total Hydraulic Production Plant</b>		B8	<b>1,120,756,105</b>	<b>291,416,325</b>	<b>1,219,594,006</b>	<b>317,115,920</b>
1537								
1538		Summary of Hydraulic Plant by Factor						
1539		S			-	-	-	-
1540		SG			1,120,756,105	291,416,325	1,219,594,006	317,115,920
1541		DGP			-	-	-	-
1542		DGU			-	-	-	-
1543		<b>Total Hydraulic Plant by Factor</b>			<b>1,120,756,105</b>	<b>291,416,325</b>	<b>1,219,594,006</b>	<b>317,115,920</b>
1544								
1545	340	Land and Land Rights						
1546		P	S		74,986	74,986	74,986	74,986
1547		P	SG		39,022,504	10,146,538	39,022,504	10,146,538
1548		P	SG		11,778,739	3,062,680	11,778,739	3,062,680
1549		P	SG		235,129	61,138	235,129	61,138
1550				B8	51,111,358	13,345,342	51,111,358	13,345,342
1551								
1552	341	Structures and Improvements						
1553		P	SG		57,276	-	57,276	-
1554		P	SG		170,259,946	44,270,584	166,781,694	43,366,178
1555		P	SG		-	-	-	-
1556		P	SG		95,644,873	24,869,351	95,644,873	24,869,351
1557		P	SG		4,273,000	1,111,055	4,273,000	1,111,055
1558				B8	270,235,094	70,250,991	266,756,842	69,346,584
1559	342	Fuel Holders, Producers & Accessories						
1560		P	SG		13,623,206	3,542,273	13,623,206	3,542,273
1561		P	SG		-	-	-	-
1562		P	SG		2,759,334	717,476	2,759,334	717,476
1563				B8	16,382,540	4,259,749	16,382,540	4,259,749





2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
ACCT	DESCRIP	BUS FUNC	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
1644	355	Poles and Fixtures						
1645		T	SG		59,871,353	15,567,606	59,871,353	15,567,606
1646		T	SG		113,621,585	29,543,613	113,621,585	29,543,613
1647		T	SG		935,765,327	243,315,465	1,242,073,063	322,960,871
1648				B8	1,109,258,265	288,426,684	1,415,566,001	368,072,090
1649								
1650	356	Clearing and Grading						
1651		T	SG		157,481,552	40,947,977	157,481,552	40,947,977
1652		T	SG		157,154,432	40,862,920	157,154,432	40,862,920
1653		T	SG		1,064,442,587	276,773,819	1,064,442,587	276,773,819
1654				B8	1,379,078,572	358,584,716	1,379,078,572	358,584,716
1655								
1656	357	Underground Conduit						
1657		T	SG		6,371	1,657	6,371	1,657
1658		T	SG		91,651	23,831	91,651	23,831
1659		T	SG		3,759,944	977,652	3,759,944	977,652
1660				B8	3,857,965	1,003,139	3,857,965	1,003,139
1661								
1662	358	Underground Conductors						
1663		T	SG		-	-	-	-
1664		T	SG		1,087,552	282,783	1,087,552	282,783
1665		T	SG		7,993,065	2,078,338	7,993,065	2,078,338
1666				B8	9,080,617	2,361,120	9,080,617	2,361,120
1667								
1668	359	Roads and Trails						
1669		T	SG		1,863,032	484,421	1,863,032	484,421
1670		T	SG		440,513	114,541	440,513	114,541
1671		T	SG		9,842,468	2,559,215	9,842,468	2,559,215
1672				B8	12,146,013	3,158,177	12,146,013	3,158,177
1673								
1674	TP	Unclassified Trans Plant - Acct 300						
1675		T	SG		924,562,138	240,402,438	924,562,138	240,402,438
1676				B8	924,562,138	240,402,438	924,562,138	240,402,438
1677								
1678	TS0	Unclassified Trans Sub Plant - Acct 300						
1679		T	SG		-	-	-	-
1680				B8	-	-	-	-
1681								
1682		<b>Total Transmission Plant</b>		B8	<b>7,736,004,378</b>	<b>2,011,497,378</b>	<b>8,042,074,296</b>	<b>2,091,080,946</b>
1683		Summary of Transmission Plant by Factor						
1684		DGP			-	-	-	-
1685		DGU			-	-	-	-
1686		SG			7,736,004,378	2,011,497,378	8,042,074,296	2,091,080,946
1687		Total Transmission Plant by Factor			7,736,004,378	2,011,497,378	8,042,074,296	2,091,080,946
1688	360	Land and Land Rights						
1689		DPW	S		66,395,110	14,306,812	71,858,475	15,341,593
1690				B8	66,395,110	14,306,812	71,858,475	15,341,593
1691								
1692	361	Structures and Improvements						
1693		DPW	S		125,858,575	32,761,372	136,094,930	34,602,903
1694				B8	125,858,575	32,761,372	136,094,930	34,602,903
1695								
1696	362	Station Equipment						
1697		DPW	S		1,044,297,304	262,150,735	1,130,227,989	278,426,317
1698				B8	1,044,297,304	262,150,735	1,130,227,989	278,426,317
1699								
1700	363	Storage Battery Equipment						
1701		DPW	S		-	-	-	-
1702				B8	-	-	-	-
1703								
1704	364	Poles, Towers & Fixtures						
1705		DPW	S		1,364,781,739	452,281,633	1,477,083,695	473,552,029
1706				B8	1,364,781,739	452,281,633	1,477,083,695	473,552,029
1707								
1708	365	Overhead Conductors						
1709		DPW	S		858,809,016	299,985,292	929,476,676	313,370,002
1710				B8	858,809,016	299,985,292	929,476,676	313,370,002
1711								
1712	366	Underground Conduit						
1713		DPW	S		426,082,888	106,676,187	461,143,396	113,316,773
1714				B8	426,082,888	106,676,187	461,143,396	113,316,773
1715								
1716								
1717								
1718								
1719	367	Underground Conductors						
1720		DPW	S		993,965,104	208,212,087	1,075,754,171	223,703,231
1721				B8	993,965,104	208,212,087	1,075,754,171	223,703,231

2020 PROTOCOL				JUNE 2021				DECEMBER 2023			
Year End				UNADJUSTED RESULTS				NORMALIZED RESULTS			
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON	TOTAL	OREGON	
ACCT		FUNC									
1722											
1723	368	Line Transformers									
1724		DPW	S		1,504,533,721	498,477,508	1,628,335,259	521,925,966			
1725				B8	1,504,533,721	498,477,508	1,628,335,259	521,925,966			
1726											
1727	369	Services									
1728		DPW	S		930,367,417	325,742,456	1,006,923,307	340,242,418			
1729				B8	930,367,417	325,742,456	1,006,923,307	340,242,418			
1730											
1731	370	Meters									
1732		DPW	S		254,673,505	97,716,304	275,629,480	101,685,442			
1733				B8	254,673,505	97,716,304	275,629,480	101,685,442			
1734											
1735	371	Installations on Customers' Premises									
1736		DPW	S		8,805,282	2,666,274	9,529,830	2,803,506			
1737				B8	8,805,282	2,666,274	9,529,830	2,803,506			
1738											
1739	372	Leased Property									
1740		DPW	S		-	-	-	-			
1741				B8	-	-	-	-			
1742											
1743	373	Street Lights									
1744		DPW	S		63,059,406	24,884,170	68,248,290	25,866,963			
1745				B8	63,059,406	24,884,170	68,248,290	25,866,963			
1746											
1747	DP	Unclassified Dist Plant - Acct 300									
1748		DPW	S		161,745,166	39,370,985	161,745,166	39,370,985			
1749				B8	161,745,166	39,370,985	161,745,166	39,370,985			
1750											
1751	DS0	Unclassified Dist Sub Plant - Acct 300									
1752		DPW	S		-	-	-	-			
1753				B8	-	-	-	-			
1754											
1755											
1756		<b>Total Distribution Plant</b>		<b>B8</b>	<b>7,803,374,232</b>	<b>2,365,231,816</b>	<b>8,432,050,664</b>	<b>2,484,208,127</b>			
1757											
1758		Summary of Distribution Plant by Factor									
1759		S			7,803,374,232	2,365,231,816	8,432,050,664	2,484,208,127			
1760											
1761		Total Distribution Plant by Factor			7,803,374,232	2,365,231,816	8,432,050,664	2,484,208,127			
1762	389	Land and Land Rights									
1763		G-SITUS	S		15,079,558	6,116,556	15,079,558	6,116,556			
1764		CUST	CN		1,128,506	349,723	1,128,506	349,723			
1765		G-DGU	SG		332	86	332	86			
1766		G-SG	SG		1,228	319	1,228	319			
1767		PTD	SO		7,611,617	2,064,667	7,611,617	2,064,667			
1768				B8	23,821,241	8,531,352	23,821,241	8,531,352			
1769											
1770	390	Structures and Improvements									
1771		G-SITUS	S		137,788,608	40,901,786	137,788,608	40,901,786			
1772		G-DGP	SG		335,238	87,168	335,238	87,168			
1773		G-DGU	SG		1,356,387	352,685	1,356,387	352,685			
1774		CUST	CN		8,207,715	2,543,565	8,207,715	2,543,565			
1775		G-SG	SG		10,392,416	2,702,211	10,392,416	2,702,211			
1776		P	SE		888,035	221,299	888,035	221,299			
1777		PTD	SO		101,391,609	27,502,687	101,391,609	27,502,687			
1778				B8	260,360,008	74,311,401	260,360,008	74,311,401			
1779											
1780	391	Office Furniture & Equipment									
1781		G-SITUS	S		7,401,451	2,404,388	7,401,451	2,404,388			
1782		G-DGP	SG		-	-	-	-			
1783		G-DGU	SG		-	-	-	-			
1784		CUST	CN		4,028,345	1,248,381	4,028,345	1,248,381			
1785		G-SG	SG		4,114,866	1,069,938	4,114,866	1,069,938			
1786		P	SE		31,954	7,963	31,954	7,963			
1787		PTD	SO		60,767,447	16,483,298	60,767,447	16,483,298			
1788		G-SG	SG		-	-	-	-			
1789		G-SG	SG		4,039	1,050	4,039	1,050			
1790				B8	76,348,102	21,215,018	76,348,102	21,215,018			

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
1791								
1792	392	Transportation Equipment						
1793		G-SITUS	S		101,190,413	26,003,370	101,150,927	25,963,884
1794		PTD	SO		7,764,904	2,106,247	7,764,904	2,106,247
1795		G-SG	SG		23,530,085	6,118,237	23,530,085	6,118,237
1796		CUST	CN		-	-	-	-
1797		G-DGU	SG		401,191	104,317	401,191	104,317
1798		P	SE		327,360	81,579	327,360	81,579
1799		G-DGP	SG		70,616	18,361	70,616	18,361
1800		G-SG	SG		-	-	-	-
1801		G-DGU	SG		44,655	11,611	44,655	11,611
1802				B8	133,329,224	34,443,720	133,289,738	34,404,234
1803								
1804	393	Stores Equipment						
1805		G-SITUS	S		9,087,544	2,735,814	9,087,544	2,735,814
1806		G-DGP	SG		-	-	-	-
1807		G-DGU	SG		-	-	-	-
1808		PTD	SO		248,585	67,429	248,585	67,429
1809		G-SG	SG		6,008,319	1,562,269	6,008,319	1,562,269
1810		G-DGU	SG		53,971	14,033	53,971	14,033
1811				B8	15,398,418	4,379,545	15,398,418	4,379,545
1812								
1813	394	Tools, Shop & Garage Equipment						
1814		G-SITUS	S		36,331,376	10,914,668	36,331,376	10,914,668
1815		G-DGP	SG		37,684	9,799	37,684	9,799
1816		G-SG	SG		21,689,441	5,639,637	21,689,441	5,639,637
1817		PTD	SO		1,959,768	531,591	1,959,768	531,591
1818		P	SE		125,691	31,322	125,691	31,322
1819		G-DGU	SG		-	-	-	-
1820		G-SG	SG		-	-	-	-
1821		G-SG	SG		89,913	23,379	89,913	23,379
1822				B8	60,233,874	17,150,396	60,233,874	17,150,396
1823								
1824	395	Laboratory Equipment						
1825		G-SITUS	S		23,539,739	9,565,368	23,539,739	9,565,368
1826		G-DGP	SG		-	-	-	-
1827		G-DGU	SG		-	-	-	-
1828		PTD	SO		4,872,934	1,321,794	4,872,934	1,321,794
1829		P	SE		1,343,231	334,735	1,343,231	334,735
1830		G-SG	SG		6,447,642	1,676,500	6,447,642	1,676,500
1831		G-SG	SG		-	-	-	-
1832		G-SG	SG		14,022	3,646	14,022	3,646
1833				B8	36,217,568	12,902,043	36,217,568	12,902,043
1834								
1835	396	Power Operated Equipment						
1836		G-SITUS	S		154,961,157	44,851,927	154,961,157	44,851,927
1837		G-DGP	SG		262,000	68,125	262,000	68,125
1838		G-SG	SG		45,162,242	11,742,978	45,162,242	11,742,978
1839		PTD	SO		8,335,763	2,261,093	8,335,763	2,261,093
1840		G-DGU	SG		924,826	240,471	924,826	240,471
1841		P	SE		236,686	58,982	236,686	58,982
1842		P	SG		-	-	-	-
1843		G-SG	SG		-	-	-	-
1844				B8	209,882,674	59,223,576	209,882,674	59,223,576
1845	397	Communication Equipment						
1846		G-SITUS	S		201,031,280	80,037,895	272,972,646	99,466,592
1847		G-DGP	SG		301,777	78,467	301,777	78,467
1848		G-DGU	SG		139,259	36,210	139,259	36,210
1849		PTD	SO		94,039,446	25,508,397	149,911,488	40,663,806
1850		CUST	CN		3,848,526	1,192,655	2,058,814	638,025
1851		G-SG	SG		182,194,294	47,373,725	190,670,129	49,577,591
1852		P	SE		361,776	90,155	93,619	23,330
1853		G-SG	SG		-	-	-	-
1854		G-SG	SG		16,633	4,325	16,633	4,325
1855				B8	481,932,990	154,321,830	616,164,365	190,488,346
1856								
1857	398	Misc. Equipment						
1858		G-SITUS	S		3,167,859	1,225,125	3,167,859	1,225,125
1859		G-DGP	SG		-	-	-	-
1860		G-DGU	SG		-	-	-	-
1861		CUST	CN		82,497	25,566	82,497	25,566
1862		PTD	SO		2,228,810	604,569	2,228,810	604,569
1863		P	SE		3,966	988	3,966	988
1864		G-SG	SG		2,872,099	746,796	2,872,099	746,796
1865		G-SG	SG		-	-	-	-
1866				B8	8,355,230	2,603,044	8,355,230	2,603,044

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
1867								
1868	399	Coal Mine						
1869		P	SE		1,822,901	454,269	50,741,701	12,644,903
1870	MP	P	SE		-	-	-	-
1871				B8	1,822,901	454,269	50,741,701	12,644,903
1872								
1873	399L	WIDCO Capital Lease						
1874		P	SE		-	-	-	-
1875					-	-	-	-
1876					-	-	-	-
1877		Remove Capital Leases			-	-	-	-
1878					-	-	-	-
1879								
1880	1011390	General Capital Leases						
1881		G-SITUS	S		4,168,467	1,612,664	4,168,467	1,612,664
1882		P	SG		9,880,847	2,569,194	9,880,847	2,569,194
1883		PTD	SO		-	-	-	-
1884				B9	14,049,314	4,181,858	14,049,314	4,181,858
1885								
1886		Remove Capital Leases			(14,049,314)	(4,181,858)	(14,049,314)	(4,181,858)
1887					-	-	-	-
1888								
1889	1011346	General Gas Line Capital Leases						
1890		P	SG		-	-	-	-
1891				B9	-	-	-	-
1892								
1893		Remove Capital Leases			-	-	-	-
1894					-	-	-	-
1895								
1896	GP	Unclassified Gen Plant - Acct 300						
1897		G-SITUS	S		-	-	-	-
1898		PTD	SO		61,631,793	16,717,753	61,631,793	16,717,753
1899		CUST	CN		-	-	-	-
1900		G-SG	SG		-	-	-	-
1901		G-DGP	SG		-	-	-	-
1902		G-DGU	SG		-	-	-	-
1903				B8	61,631,793	16,717,753	61,631,793	16,717,753
1904								
1905	399G	Unclassified Gen Plant - Acct 300						
1906		G-SITUS	S		-	-	-	-
1907		PTD	SO		-	-	-	-
1908		G-SG	SG		-	-	-	-
1909		G-DGP	SG		-	-	-	-
1910		G-DGU	SG		-	-	-	-
1911				B8	-	-	-	-
1912								
1913		<b>Total General Plant</b>		<b>B8</b>	<b>1,369,334,022</b>	<b>406,253,947</b>	<b>1,552,444,712</b>	<b>454,571,611</b>
1914								
1915		Summary of General Plant by Factor						
1916		S			693,747,452	226,369,560	765,649,333	245,758,770
1917		DGP			-	-	-	-
1918		DGU			-	-	-	-
1919		SG			316,346,020	82,255,536	324,821,855	84,459,403
1920		SO			350,852,677	95,169,525	406,724,719	110,324,933
1921		SE			5,141,598	1,281,293	53,792,243	13,405,102
1922		CN			17,295,589	5,359,891	15,505,877	4,805,260
1923		DEU			-	-	-	-
1924		SSGCT			-	-	-	-
1925		SSGCH			-	-	-	-
1926		Less Capital Leases			(14,049,314)	(4,181,858)	(14,049,314)	(4,181,858)
1927		Total General Plant by Factor			1,369,334,022	406,253,947	1,552,444,712	454,571,611
1928	301	Organization						
1929		I-SITUS	S		-	-	-	-
1930		PTD	SO		-	-	-	-
1931		I-SG	SG		-	-	-	-
1932				B8	-	-	-	-
1933	302	Franchise & Consent						
1934		I-SITUS	S		(31,081,215)	-	(31,081,215)	-
1935		I-SG	SG		13,159,840	3,421,790	12,027,142	3,127,269
1936		I-SG	SG		177,566,825	46,170,502	177,482,844	46,148,665
1937		I-SG	SG		10,014,897	2,604,050	9,746,329	2,534,217
1938		I-DGP	SG		-	-	-	-
1939		I-DGU	SG		477,596	124,183	477,596	124,183
1940				B8	170,137,943	52,320,525	168,652,697	51,934,335

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
1941								
1942	303	Miscellaneous Intangible Plant						
1943		I-SITUS	S		22,092,897	4,616,002	21,935,586	4,609,463
1944		I-SG	SG		197,523,407	51,359,564	197,523,407	51,359,564
1945		PTD	SO		432,009,413	117,183,460	476,788,634	129,329,917
1946		P	SE		9,106	2,269	(64,323)	(16,029)
1947		CUST	CN		214,248,773	66,395,542	213,633,287	66,204,803
1948		P	SG		-	-	-	-
1949		I-DGP	SG		-	-	-	-
1950				B8	<u>865,883,596</u>	<u>239,556,838</u>	<u>909,816,590</u>	<u>251,487,718</u>
1951	303	Less Non-Regulated Plant						
1952		I-SITUS	S		-	-	-	-
1953					<u>865,883,596</u>	<u>239,556,838</u>	<u>909,816,590</u>	<u>251,487,718</u>
1954	IP	Unclassified Intangible Plant - Acct 300						
1955		I-SITUS	S		-	-	-	-
1956		I-SG	SG		-	-	-	-
1957		I-DGU	SG		-	-	-	-
1958		PTD	SO		-	-	-	-
1959					-	-	-	-
1960					-	-	-	-
1961		<b>Total Intangible Plant</b>		B8	<b><u>1,036,021,539</u></b>	<b><u>291,877,362</u></b>	<b><u>1,078,469,287</u></b>	<b><u>303,422,053</u></b>
1962								
1963		Summary of Intangible Plant by Factor						
1964		S			(8,988,318)	4,616,002	(9,145,629)	4,609,463
1965		DGP			-	-	-	-
1966		DGU			-	-	-	-
1967		SG			398,742,565	103,680,089	397,257,319	103,293,899
1968		SO			432,009,413	117,183,460	476,788,634	129,329,917
1969		CN			214,248,773	66,395,542	213,633,287	66,204,803
1970		SSGCT			-	-	-	-
1971		SSGCH			-	-	-	-
1972		SE			9,106	2,269	(64,323)	(16,029)
1973		<b>Total Intangible Plant by Factor</b>			<b><u>1,036,021,539</u></b>	<b><u>291,877,362</u></b>	<b><u>1,078,469,287</u></b>	<b><u>303,422,053</u></b>
1974		Summary of Unclassified Plant (Account 106)						
1975		DP			161,745,166	39,370,985	161,745,166	39,370,985
1976		DS0			-	-	-	-
1977		GP			61,631,793	16,717,753	61,631,793	16,717,753
1978		HP			-	-	-	-
1979		NP			-	-	-	-
1980		OP			(553,173)	(143,835)	(553,173)	(143,835)
1981		TP			924,562,138	240,402,438	924,562,138	240,402,438
1982		TS0			-	-	-	-
1983		IP			-	-	-	-
1984		MP			-	-	-	-
1985		SP			57,225,129	14,879,541	57,225,129	14,879,541
1986		<b>Total Unclassified Plant by Factor</b>			<b><u>1,204,611,053</u></b>	<b><u>311,226,884</u></b>	<b><u>1,204,611,053</u></b>	<b><u>311,226,884</u></b>
1987								
1988		<b>Total Electric Plant In Service</b>		B8	<b><u>31,317,729,025</u></b>	<b><u>8,552,036,959</u></b>	<b><u>32,563,280,596</u></b>	<b><u>8,832,858,186</u></b>
1989		Summary of Electric Plant by Factor						
1990		S			8,488,566,813	2,596,292,363	9,189,303,131	2,734,966,661
1991		SE			5,150,704	1,283,563	53,727,919	13,389,073
1992		DGU			-	-	-	-
1993		DGP			-	-	-	-
1994		SG			21,823,654,370	5,674,534,474	22,221,646,344	5,778,019,396
1995		SO			782,862,090	212,352,985	883,513,353	239,654,851
1996		CN			231,544,362	71,755,433	229,139,163	71,010,064
1997		DEU			-	-	-	-
1998		SSGCH			-	-	-	-
1999		SSGCT			-	-	-	-
2000		Less Capital Leases			(14,049,314)	(4,181,858)	(14,049,314)	(4,181,858)
2001					<u>31,317,729,025</u>	<u>8,552,036,959</u>	<u>32,563,280,596</u>	<u>8,832,858,186</u>
2002	105	Plant Held For Future Use						
2003		DPW	S		13,293,032	6,893,577	-	-
2004		P	SG		-	-	-	-
2005		T	SG		1,679,914	436,807	1,679,914	436,807
2006		P	SG		8,923,302	2,320,216	8,923,302	2,320,216
2007		P	SE		-	-	-	-
2008		G	SG		-	-	(10,603,216)	(2,757,023)
2009								
2010								
2011		<b>Total Plant Held For Future Use</b>		B10	<b><u>23,896,248</u></b>	<b><u>9,650,600</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
2012								
2013	114	Electric Plant Acquisition Adjustments						
2014		P	S		11,763,784	-	11,763,784	-
2015		P	SG		144,704,699	37,625,770	3,518,456	914,861
2016		P	SG		-	-	-	-
2017		<b>Total Electric Plant Acquisition Adjustment</b>		B15	<b><u>156,468,483</u></b>	<b><u>37,625,770</u></b>	<b><u>15,282,240</u></b>	<b><u>914,861</u></b>

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
2018								
2019	115	Accum	Provision for Asset Acquisition Adjustments					
2020		P	S		(3,612,186)	-	(3,612,186)	-
2021		P	SG		(137,980,477)	(35,877,354)	(827,259)	(215,102)
2022		P	SG		-	-	-	-
2023				B15	(141,592,663)	(35,877,354)	(4,439,444)	(215,102)
2024								
2025	128	Pensions						
2026			LABOR	SO	28,656,862	7,773,234	-	-
2027		<b>Total Pensions</b>		<b>B15</b>	<b>28,656,862</b>	<b>7,773,234</b>	<b>-</b>	<b>-</b>
2028								
2029	124	Weatherization						
2030			DMSC	S	629,485	-	629,485	-
2031			DMSC	SO	-	-	-	-
2032				B16	629,485	-	629,485	-
2033								
2034	182W	Weatherization						
2035			DMSC	S	198,594,752	-	198,594,752	-
2036			DMSC	SG	-	-	-	-
2037			DMSC	SGCT	-	-	-	-
2038			DMSC	SO	-	-	-	-
2039				B16	198,594,752	-	198,594,752	-
2040								
2041	186W	Weatherization						
2042			DMSC	S	-	-	-	-
2043			DMSC	CN	-	-	-	-
2044			DMSC	CNP	-	-	-	-
2045			DMSC	SG	-	-	-	-
2046			DMSC	SO	-	-	-	-
2047				B16	-	-	-	-
2048								
2049		<b>Total Weatherization</b>		<b>B16</b>	<b>199,224,237</b>	<b>-</b>	<b>199,224,237</b>	<b>-</b>
2050								
2051	151	Fuel Stock						
2052			P	DEU	-	-	-	-
2053			P	SE	206,953,359	51,573,066	154,799,799	38,576,326
2054			P	SE	-	-	-	-
2055			P	SE	-	-	-	-
2056				B13	206,953,359	51,573,066	154,799,799	38,576,326
2057								
2058	152	Fuel Stock - Undistributed						
2059			P	SE	-	-	-	-
2060					-	-	-	-
2061								
2062	25316	UAMPS Working Capital Deposit						
2063			P	SE	(2,806,000)	(699,259)	(2,803,000)	(698,512)
2064				B13	(2,806,000)	(699,259)	(2,803,000)	(698,512)
2065								
2066	25317	DG&T Working Capital Deposit						
2067			P	SE	(2,675,523)	(666,744)	(2,641,354)	(658,229)
2068				B13	(2,675,523)	(666,744)	(2,641,354)	(658,229)
2069								
2070	25319	Provo Working Capital Deposit						
2071			P	SE	-	-	-	-
2072					-	-	-	-
2073								
2074		<b>Total Fuel Stock</b>		<b>B13</b>	<b>201,471,836</b>	<b>50,207,063</b>	<b>149,355,445</b>	<b>37,219,586</b>
2075	154	Materials and Supplies						
2076			MSS	S	142,474,539	49,096,450	142,474,539	49,096,450
2077			MSS	SG	4,837,325	1,257,790	(504,572)	(131,198)
2078			MSS	SE	-	-	-	-
2079			MSS	SO	(1,284,248)	(348,355)	(1,284,248)	(348,355)
2080			MSS	SG	120,142,856	31,239,258	120,142,856	31,239,258
2081			MSS	SG	7,954	2,068	7,954	2,068
2082			MSS	SNPD	(1,308,783)	(346,469)	(1,308,783)	(346,469)
2083			MSS	SG	-	-	-	-
2084			MSS	SG	-	-	-	-
2085			MSS	SG	-	-	-	-
2086			MSS	SG	-	-	-	-
2087			MSS	SG	8,430,223	2,192,006	8,430,223	2,192,006
2088			MSS	SG	-	-	-	-
2089				B13	273,299,865	83,092,749	267,957,968	81,703,762
2090								
2091	163	Stores Expense Undistributed						
2092			MSS	SO	-	-	-	-
2093								
2094				B13	-	-	-	-

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
2095								
2096	25318	Provo Working Capital Deposit						
2097		MSS	SG		(273,000)	(70,985)	(273,000)	(70,985)
2098								
2099				B13	(273,000)	(70,985)	(273,000)	(70,985)
2100								
2101		<b>Total Materials and Supplies</b>		<b>B13</b>	<b>273,026,865</b>	<b>83,021,764</b>	<b>267,684,968</b>	<b>81,632,777</b>
2102								
2103	165	Prepayments						
2104		DMSC	S		41,441,441	4,077,479	41,441,441	4,077,479
2105		GP	GPS		160,162	43,444	160,162	43,444
2106		PT	SG		3,834,288	996,982	3,834,288	996,982
2107		P	SE		45,735	11,397	45,735	11,397
2108		PTD	SO		22,072,726	5,987,273	22,072,726	5,987,273
2109		<b>Total Prepayments</b>		<b>B15</b>	<b>67,554,352</b>	<b>11,116,576</b>	<b>67,554,352</b>	<b>11,116,576</b>
2110								
2111	182M	Misc Regulatory Assets						
2112		DDS2	S		184,523,735	(11,607,347)	196,131,082	-
2113		DEFSG	SG		6,984,837	1,816,181	2,344,579	609,632
2114		P	SGCT		-	-	-	-
2115		DEFSG	SG-P		-	-	-	-
2116		P	SE		193,501,291	48,220,792	115,119,099	28,687,840
2117		P	SG		-	-	-	-
2118		DDSO2	SO		460,943,527	125,031,899	45,802,824	12,424,112
2119				B16	845,953,389	163,461,524	359,397,585	41,721,584
2120								
2121	186M	Misc Deferred Debits						
2122		LABOR	S		2,443,884	-	2,443,884	-
2123		P	SG		-	-	-	-
2124		P	SG		-	-	-	-
2125		DEFSG	SG		113,459,708	29,501,522	96,510,696	25,094,481
2126		LABOR	SO		78,384	21,262	78,384	21,262
2127		P	SE		809,282	201,674	809,282	201,674
2128		P	SG		-	-	-	-
2129		GP	EXCTAX		-	-	-	-
2130		<b>Total Misc. Deferred Debits</b>		<b>B11</b>	<b>116,791,258</b>	<b>29,724,458</b>	<b>99,842,246</b>	<b>25,317,417</b>
2131								
2132		Working Capital						
2133	CWC	Cash Working Capital						
2134		CWC	S		30,372,003	8,566,801	30,861,836	8,765,418
2135		CWC	SO		-	-	-	-
2136		CWC	SE		-	-	-	-
2137				B14	30,372,003	8,566,801	30,861,836	8,765,418
2138								
2139	OWC	Other Work. Cap.						
2140	131	Cash	GP	SNP	-	-	-	-
2141	135	Working Funds	GP	SG	-	-	-	-
2142	141	Notes Receivable	GP	SO	-	-	-	-
2143	143	Other A/R	GP	SO	38,636,523	10,480,238	38,636,523	10,480,238
2144	232	A/P	PTD	S	(18,882)	-	(18,882)	-
2145	232	A/P	PTD	SO	(6,155,803)	(1,669,775)	(6,155,803)	(1,669,775)
2146	232	A/P	P	SE	(3,116,112)	(776,540)	(3,116,112)	(776,540)
2147	232	A/P	T	SG	(3,331,340)	(866,207)	(3,331,340)	(866,207)
2148	2533	Other Msc. Df. Crd.	P	S	-	-	-	-
2149	2533	Other Msc. Df. Crd.	P	SE	(7,150,412)	(1,781,893)	(9,303,790)	(2,318,518)
2150	230	Asset Retir. Oblig.	P	SG	-	-	-	-
2151	230	Asset Retir. Oblig.	P	S	(2,978,037)	-	(2,978,037)	-
2152	254	Decom. Reg Liability	P	SG	-	-	-	-
2153	254	Reclam. Reg Liability	P	SE	-	-	-	-
2154	2533	Cholla Reclamation	P	SE	-	-	-	-
2155				B14	15,885,936	5,385,824	13,732,558	4,849,199
2156								
2157		<b>Total Working Capital</b>		<b>B14</b>	<b>46,257,939</b>	<b>13,952,625</b>	<b>44,594,394</b>	<b>13,614,617</b>
2158		Miscellaneous Rate Base						
2159	18221	Unrec Plant & Reg Study Costs						
2160		P	S		-	-	-	-
2161								
2162								
2163								
2164	18222	Nuclear Plant - Trojan						
2165		P	S		-	-	-	-
2166		P	TROJP		-	-	-	-
2167		P	TROJD		-	-	-	-
2168				B16	-	-	-	-

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
2169								
2170								
2171								
2172	1869	Misc Deferred Debits-Trojan						
2173		P	S		-	-	(101,493)	(101,493)
2174		P	SG		-	-	-	-
2175					-	-	(101,493)	(101,493)
2176								
2177		<b>Total Miscellaneous Rate Base</b>		<b>B15</b>	<b>-</b>	<b>-</b>	<b>(101,493)</b>	<b>(101,493)</b>
2178								
2179		<b>Total Rate Base Additions</b>			<b>1,817,708,806</b>	<b>370,656,260</b>	<b>1,198,394,529</b>	<b>211,220,822</b>
2180	235	Customer Service Deposits						
2181		CUST	S		-	-	-	-
2182		CUST	CN		-	-	-	-
2183		<b>Total Customer Service Deposits</b>		<b>B15</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
2184								
2185	2281	Prop Ins	PTD	S	(5,903,206)	20,937,606	(5,903,206)	20,937,606
2186	2282	Inj & Dam	PTD	SO	(141,155,665)	(38,288,770)	-	-
2187	2283	Pen & Ben	PTD	SO	(76,044,531)	(20,627,239)	(1,612,198)	(437,312)
2188	2282	Prov for Injurie	PTD	S	(12,416,392)	(12,416,392)	(12,416,392)	(12,416,392)
	254	Reg Liabilities	PTD	SO	(11,202,836)	(3,038,793)	(11,202,836)	(3,038,793)
2189	25335	Reg Liabilities	PTD	SE	(115,119,099)	(28,687,840)	(115,119,099)	(28,687,840)
2190				<b>B15</b>	<b>(361,841,730)</b>	<b>(82,121,428)</b>	<b>(146,253,732)</b>	<b>(23,642,731)</b>
2191								
2192	22841	Accum Misc. Operating Provisions						
2193		P	S		-	-	-	-
2194		P	SG		(234,853)	(61,066)	(234,853)	(61,066)
2195				<b>B15</b>	<b>(234,853)</b>	<b>(61,066)</b>	<b>(234,853)</b>	<b>(61,066)</b>
2196								
2197	254105	ARO	P	S	-	-	-	-
2198	230	ARO	P	TROJD	(5,565,959)	(1,436,487)	(5,565,959)	(1,436,487)
2199	254105	ARO	P	TROJD	-	-	-	-
2200	254	ARO	P	S	(1,823,401,237)	(385,458,427)	(1,807,135,161)	(369,192,352)
2201				<b>B15</b>	<b>(1,828,967,196)</b>	<b>(386,894,914)</b>	<b>(1,812,701,121)</b>	<b>(370,628,839)</b>
2202								
2203	252	Customer Advances for Construction						
2204		DPW	S		(1,709,876)	(1,424,117)	(23,708,755)	(2,069,907)
2205		DPW	SE		-	-	-	-
2206		T	SG		(102,399,151)	(26,625,583)	(80,400,272)	(20,905,487)
2207		DPW	SO		-	-	-	-
2208		CUST	CN		-	-	-	-
2209		<b>Total Customer Advances for Construction</b>		<b>B20</b>	<b>(104,109,027)</b>	<b>(28,049,700)</b>	<b>(104,109,027)</b>	<b>(22,975,394)</b>
2210								
2211	25398	SO2 Emissions						
2212		P	SE		-	-	-	-
2213					-	-	-	-
2214								
2215	25399	Other Deferred Credits						
2216		P	S		(405,265)	(204,430)	(405,265)	(204,430)
2217		LABOR	SO		-	-	-	-
2218		P	SG		(63,848,335)	(16,601,692)	(63,848,335)	(16,601,692)
2219		P	SE		(14,598,111)	(3,637,870)	(14,598,111)	(3,637,870)
2220				<b>B15</b>	<b>(78,851,712)</b>	<b>(20,443,991)</b>	<b>(78,851,712)</b>	<b>(20,443,991)</b>
2221								
2222	190	Accumulated Deferred Income Taxes						
2223		P	S		455,694,550	97,713,118	437,493,308	93,571,742
2224		CUST	CN		-	-	-	-
2225		LABOR	SO		126,177,788	34,225,990	53,932,101	14,629,196
2226		P	DGP		-	-	-	-
2227		IBT	IBT		-	-	-	-
2228		P	SG		-	-	-	-
2229		P	SG		-	-	-	-
2230		CUST	BADDEBT		4,646,301	2,250,465	4,933,337	2,389,493
2231		P	TROJD		1,298,701	335,174	1,288,724	332,600
2232		P	SG		1,952,500	507,684	1,374,949	357,511
2233		P	SE		31,308,246	7,802,059	1,888,088	470,514
2234		PTD	SNP		-	-	-	-
2235		DPW	SNPD		691,719	183,116	1,546,918	409,509
2236		P	SG		-	-	-	-
2237				<b>B19</b>	<b>621,769,805</b>	<b>143,017,606</b>	<b>502,457,426</b>	<b>112,160,564</b>
2238								
2239	281	Accumulated Deferred Income Taxes						
2240		P	S		-	-	-	-
2241		PT	SG		(148,004,159)	(38,483,688)	(0)	(0)
2242		T	SG		-	-	-	-
2243				<b>B19</b>	<b>(148,004,159)</b>	<b>(38,483,688)</b>	<b>(0)</b>	<b>(0)</b>





2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC	DESCRIP	BUS	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
ACCT		FUNC						
2325	108EP	Experimental Plant - Accum Depr						
2326		P	SG		-	-	-	-
2327		P	SG		-	-	-	-
2328					-	-	-	-
2329								
2330				B17	<u>(3,999,206,912)</u>	<u>(1,038,044,399)</u>	<u>(6,006,791,217)</u>	<u>(1,695,613,093)</u>
2331								
2332								
2333		S			(6,998,866)	-	(190,194,333)	(183,195,467)
2334		DGP			-	-	-	-
2335		DGU			-	-	-	-
2336		SG			(3,992,208,046)	(1,038,044,399)	(5,816,596,884)	(1,512,417,626)
2337		SSGCH			-	-	-	-
2338		SSGCT			-	-	-	-
2339					<u>(3,999,206,912)</u>	<u>(1,038,044,399)</u>	<u>(6,006,791,217)</u>	<u>(1,695,613,093)</u>
2340								
2341								
2342	108TP	Transmission Plant Accumulated Depr						
2343		T	SG		(353,157,214)	(91,827,095)	(353,157,214)	(91,827,095)
2344		T	SG		(426,788,101)	(110,972,422)	(426,788,101)	(110,972,422)
2345		T	SG		(1,221,447,907)	(317,597,967)	(1,394,469,745)	(362,586,692)
2346				B17	<u>(2,001,393,221)</u>	<u>(520,397,484)</u>	<u>(2,174,415,059)</u>	<u>(565,386,209)</u>
2347	108360	Land and Land Rights						
2348		DPW	S		(10,029,714)	(2,430,506)	(11,725,368)	(2,747,792)
2349				B17	<u>(10,029,714)</u>	<u>(2,430,506)</u>	<u>(11,725,368)</u>	<u>(2,747,792)</u>
2350								
2351	108361	Structures and Improvements						
2352		DPW	S		(33,171,627)	(9,015,640)	(36,385,910)	(9,617,086)
2353				B17	<u>(33,171,627)</u>	<u>(9,015,640)</u>	<u>(36,385,910)</u>	<u>(9,617,086)</u>
2354								
2355	108362	Station Equipment						
2356		DPW	S		(354,040,121)	(101,151,751)	(380,710,272)	(106,142,180)
2357				B17	<u>(354,040,121)</u>	<u>(101,151,751)</u>	<u>(380,710,272)</u>	<u>(106,142,180)</u>
2358								
2359	108363	Storage Battery Equipment						
2360		DPW	S		-	-	-	-
2361				B17	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
2362								
2363	108364	Poles, Towers & Fixtures						
2364		DPW	S		(676,436,873)	(255,299,196)	(711,267,917)	(261,797,228)
2365				B17	<u>(676,436,873)</u>	<u>(255,299,196)</u>	<u>(711,267,917)</u>	<u>(261,797,228)</u>
2366								
2367	108365	Overhead Conductors						
2368		DPW	S		(349,174,705)	(138,403,566)	(371,107,699)	(142,507,594)
2369				B17	<u>(349,174,705)</u>	<u>(138,403,566)</u>	<u>(371,107,699)</u>	<u>(142,507,594)</u>
2370								
2371	108366	Underground Conduit						
2372		DPW	S		(179,429,394)	(48,957,173)	(190,311,061)	(50,993,314)
2373				B17	<u>(179,429,394)</u>	<u>(48,957,173)</u>	<u>(190,311,061)</u>	<u>(50,993,314)</u>
2374								
2375	108367	Underground Conductors						
2376		DPW	S		(380,517,399)	(96,545,872)	(405,902,124)	(101,295,777)
2377				B17	<u>(380,517,399)</u>	<u>(96,545,872)</u>	<u>(405,902,124)</u>	<u>(101,295,777)</u>
2378								
2379	108368	Line Transformers						
2380		DPW	S		(604,818,198)	(252,937,731)	(643,242,258)	(260,127,513)
2381				B17	<u>(604,818,198)</u>	<u>(252,937,731)</u>	<u>(643,242,258)</u>	<u>(260,127,513)</u>
2382								
2383	108369	Services						
2384		DPW	S		(362,180,959)	(145,922,962)	(385,941,472)	(150,368,950)
2385				B17	<u>(362,180,959)</u>	<u>(145,922,962)</u>	<u>(385,941,472)</u>	<u>(150,368,950)</u>
2386								
2387	108370	Meters						
2388		DPW	S		(107,844,570)	(22,471,764)	(114,348,638)	(23,688,784)
2389				B17	<u>(107,844,570)</u>	<u>(22,471,764)</u>	<u>(114,348,638)</u>	<u>(23,688,784)</u>
2390								
2391								
2392								
2393	108371	Installations on Customers' Premises						
2394		DPW	S		(7,220,271)	(2,126,093)	(7,445,148)	(2,168,171)
2395				B17	<u>(7,220,271)</u>	<u>(2,126,093)</u>	<u>(7,445,148)</u>	<u>(2,168,171)</u>
2396								
2397	108372	Leased Property						
2398		DPW	S		-	-	-	-
2399				B17	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
2400								
2401	108373	Street Lights						
2402		DPW	S		(34,236,684)	(12,787,348)	(35,847,149)	(13,088,693)
2403				B17	<u>(34,236,684)</u>	<u>(12,787,348)</u>	<u>(35,847,149)</u>	<u>(13,088,693)</u>

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
FERC ACCT	DESCRIP	BUS FUNC	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
2404								
2405	108D00	Unclassified Dist Plant - Acct 300						
2406		DPW	S		-	-	-	-
2407				B17	-	-	-	-
2408								
2409	108DS	Unclassified Dist Sub Plant - Acct 300						
2410		DPW	S		-	-	-	-
2411				B17	-	-	-	-
2412								
2413	108DP	Unclassified Dist Sub Plant - Acct 300						
2414		DPW	S		6,095,445	2,061,813	6,095,445	2,061,813
2415				B17	6,095,445	2,061,813	6,095,445	2,061,813
2416								
2417								
2418		<b>Total Distribution Plant Accum Depreciation</b>		B17	<b>(3,093,005,071)</b>	<b>(1,085,987,789)</b>	<b>(3,288,139,572)</b>	<b>(1,122,481,268)</b>
2419								
2420		Summary of Distribution Plant Depr by Factor						
2421		S			(3,093,005,071)	(1,085,987,789)	(3,288,139,572)	(1,122,481,268)
2422								
2423		Total Distribution Depreciation by Factor			<u>(3,093,005,071)</u>	<u>(1,085,987,789)</u>	<u>(3,288,139,572)</u>	<u>(1,122,481,268)</u>
2424	108GP	General Plant Accumulated Depr						
2425		G-SITUS	S		(277,590,932)	(98,593,172)	(304,116,789)	(108,559,029)
2426		G-DGP	SG		(715,242)	(185,975)	(715,242)	(185,975)
2427		G-DGU	SG		(1,951,711)	(507,479)	(1,951,711)	(507,479)
2428		G-SG	SG		(127,433,166)	(33,134,868)	(138,970,814)	(36,134,859)
2429		CUST	CN		(7,270,206)	(2,253,032)	(6,909,506)	(2,141,251)
2430		PTD	SO		(116,526,662)	(31,608,102)	(126,079,770)	(34,199,402)
2431		P	SE		(1,538,215)	(383,325)	(1,494,391)	(372,404)
2432		G-SG	SG		(130,406)	(33,908)	(130,406)	(33,908)
2433		G-SG	SG		-	-	-	-
2434				B17	(533,156,539)	(166,699,860)	(580,368,628)	(182,134,308)
2435								
2436								
2437	108MP	Mining Plant Accumulated Depr.						
2438		P	S		-	-	-	-
2439		P	SE		-	-	-	-
2440				B17	-	-	-	-
2441	108MP	Less Centralia Situs Depreciation						
2442		P	S		-	-	-	-
2443				B17	-	-	-	-
2444								
2445	1081390	Accum Depr - Capital Lease						
2446		PTD	SO		-	-	-	-
2447				B17	-	-	-	-
2448								
2449		Remove Capital Leases			-	-	-	-
2450				B17	-	-	-	-
2451								
2452	1081399	Accum Depr - Capital Lease						
2453		P	S		-	-	-	-
2454		P	SE		-	-	-	-
2455				B17	-	-	-	-
2456								
2457		Remove Capital Leases			-	-	-	-
2458				B17	-	-	-	-
2459								
2460								
2461		<b>Total General Plant Accum Depreciation</b>		B17	<b>(533,156,539)</b>	<b>(166,699,860)</b>	<b>(580,368,628)</b>	<b>(182,134,308)</b>
2462								
2463								
2464								
2465		Summary of General Depreciation by Factor						
2466		S			(277,590,932)	(98,593,172)	(304,116,789)	(108,559,029)
2467		DGP			-	-	-	-
2468		DGU			-	-	-	-
2469		SE			(1,538,215)	(383,325)	(1,494,391)	(372,404)
2470		SO			(116,526,662)	(31,608,102)	(126,079,770)	(34,199,402)
2471		CN			(7,270,206)	(2,253,032)	(6,909,506)	(2,141,251)
2472		SG			(130,230,525)	(33,862,230)	(141,768,172)	(36,862,221)
2473		DEU			-	-	-	-
2474		SSGCT			-	-	-	-
2475		SSGCH			-	-	-	-
2476		Remove Capital Leases			-	-	-	-
2477		Total General Depreciation by Factor			<u>(533,156,539)</u>	<u>(166,699,860)</u>	<u>(580,368,628)</u>	<u>(182,134,308)</u>
2478								
2479								
2480		<b>Total Accum Depreciation - Plant In Service</b>		B17	<b>(9,626,761,743)</b>	<b>(2,811,129,532)</b>	<b>(12,049,714,476)</b>	<b>(3,565,614,879)</b>

2020 PROTOCOL				JUNE 2021		DECEMBER 2023		
Year End				UNADJUSTED RESULTS		NORMALIZED RESULTS		
ACCT	DESCRIP	BUS FUNC	FACTOR	Ref	TOTAL	OREGON	TOTAL	OREGON
2481	111SP	Accum Prov for Amort-Steam						
2482		P	SG		-	-	-	-
2483		P	SG		-	-	-	-
2484				B18	-	-	-	-
2485								
2486								
2487	111GP	Accum Prov for Amort-General						
2488		G-SITUS	S		(11,923,722)	(4,741,005)	(12,632,235)	(5,225,362)
2489		CUST	CN		-	-	-	-
2490		I-SG	SG		-	-	-	-
2491		PTD	SO		(1,174,857)	(318,682)	(1,337,295)	(362,744)
2492		P	SE		-	-	-	-
2493				B18	(13,098,578)	(5,059,687)	(13,969,530)	(5,588,106)
2494								
2495								
2496	111HP	Accum Prov for Amort-Hydro						
2497		P	SG		-	-	-	-
2498		P	SG		-	-	-	-
2499		P	SG		(3,139,235)	(816,256)	(3,606,778)	(937,826)
2500		P	SG		-	-	-	-
2501				B18	(3,139,235)	(816,256)	(3,606,778)	(937,826)
2502								
2503								
2504	111IP	Accum Prov for Amort-Intangible Plant						
2505		I-SITUS	S		30,478,582	(129,177)	30,343,931	(140,175)
2506		I-DGP	SG		-	-	-	-
2507		I-DGU	SG		(397,058)	(103,242)	(397,058)	(103,242)
2508		P	SE		(1,897)	(473)	84,709	21,110
2509		I-SG	SG		(105,977,548)	(27,556,029)	(115,585,895)	(30,054,368)
2510		I-SG	SG		(114,544,697)	(29,783,638)	(118,482,024)	(30,807,413)
2511		I-SG	SG		(5,755,401)	(1,496,506)	(5,961,962)	(1,550,215)
2512		CUST	CN		(162,639,670)	(50,401,918)	(182,729,117)	(56,627,623)
2513		P	SG		-	-	-	-
2514		P	SG		-	-	-	-
2515		PTD	SO		(316,598,295)	(85,877,952)	(339,134,793)	(91,991,024)
2516				B18	(675,435,985)	(195,348,934)	(731,862,209)	(211,252,951)
2517	111IP	Less Non-Regulated Plant						
2518		NUTIL	OTH		-	-	-	-
2519					(675,435,985)	(195,348,934)	(731,862,209)	(211,252,951)
2520								
2521	111390	Accum Amtr - Capital Lease						
2522		G-SITUS	S		-	-	-	-
2523		P	SG		-	-	-	-
2524		PTD	SO		-	-	-	-
2525				B9	-	-	-	-
2526								
2527		Remove Capital Lease Amtr			-	-	-	-
2528								
2529		<b>Total Accum Provision for Amortization</b>		<b>B18</b>	<b>(691,673,798)</b>	<b>(201,224,878)</b>	<b>(749,438,517)</b>	<b>(217,778,883)</b>
2530								
2531								
2532								
2533								
2534		Summary of Amortization by Factor						
2535		S			18,554,860	(4,870,181)	17,711,696	(5,365,536)
2536		DGP			-	-	-	-
2537		DGU			-	-	-	-
2538		SE			(1,897)	(473)	84,709	21,110
2539		SO			(317,773,151)	(86,196,634)	(340,472,088)	(92,353,768)
2540		CN			(162,639,670)	(50,401,918)	(182,729,117)	(56,627,623)
2541		SSGCT			-	-	-	-
2542		SSGCH			-	-	-	-
2543		SG			(229,813,940)	(59,755,672)	(244,033,718)	(63,453,064)
2544		Less Capital Lease			-	-	-	-
2545		<b>Total Provision For Amortization by Factor</b>			<b>(691,673,798)</b>	<b>(201,224,878)</b>	<b>(749,438,517)</b>	<b>(217,778,883)</b>

Tab % RehWgW

**PacifiCorp**  
**Oregon General Rate Case – December 2023**  
**Revenue Adjustment Index**

The Company used actual revenue for the 12 months ended June 30, 2021 as the starting point for the calculation of pro forma revenue. Actual revenue was adjusted using the normalizing and pro forma adjustments below to calculate the revenue for the December 2023 test period.

- 3.1\_R Pro Forma Revenue
- 3.2\_R REC Revenue – Revised for allocation factor impact only
- 3.3\_R Wheeling Revenue – Revised for allocation factor impact only
- 3.4\_R Ancillary Revenue – Revised for allocation factor impact only
- 3.5\_R Fly Ash Revenue – Revised for allocation factor impact only

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Tab 3 Adjustment Summary**

	Total Adjustments	3.1_R Pro Forma Revenue	3.2_R REC Revenue	3.3_R Wheeling Revenue	3.4_R Ancillary Revenue	3.5_R Fly Ash Revenue
1 Operating Revenues:						
2 General Business Revenues	(64,543,148)	(64,543,148)	-	-	-	-
3 Interdepartmental	-	-	-	-	-	-
4 Special Sales	-	-	-	-	-	-
5 Other Operating Revenues	4,692,224	-	(1,636,748)	8,243,703	(2,740,971)	826,240
6 Total Operating Revenues	(59,850,924)	(64,543,148)	(1,636,748)	8,243,703	(2,740,971)	826,240
7						
8 Operating Expenses:						
9 Steam Production	-	-	-	-	-	-
10 Nuclear Production	-	-	-	-	-	-
11 Hydro Production	-	-	-	-	-	-
12 Other Power Supply	-	-	-	-	-	-
13 Transmission	-	-	-	-	-	-
14 Distribution	-	-	-	-	-	-
15 Customer Accounting	-	-	-	-	-	-
16 Customer Service & Info	-	-	-	-	-	-
17 Sales	-	-	-	-	-	-
18 Administrative & General	-	-	-	-	-	-
19						
20 Total O&M Expenses	-	-	-	-	-	-
21						
22 Depreciation	-	-	-	-	-	-
23 Amortization	-	-	-	-	-	-
24 Taxes Other Than Income	-	-	-	-	-	-
25 Income Taxes - Federal	(11,997,447)	(12,938,030)	(328,095)	1,652,496	(549,443)	165,624
26 Income Taxes - State	(2,717,090)	(2,930,106)	(74,304)	374,245	(124,434)	37,509
27 Income Taxes - Def Net	-	-	-	-	-	-
28 Investment Tax Credit Adj.	-	-	-	-	-	-
29 Misc Revenue & Expense	-	-	-	-	-	-
30						
31 Total Operating Expenses:	(14,714,537)	(15,868,135)	(402,400)	2,026,740	(673,876)	203,134
32						
33 Operating Rev For Return:	(45,136,387)	(48,675,013)	(1,234,348)	6,216,963	(2,067,095)	623,106
34						
35 Rate Base:						
36 Electric Plant In Service	-	-	-	-	-	-
37 Plant Held for Future Use	-	-	-	-	-	-
38 Misc Deferred Debits	-	-	-	-	-	-
39 Elec Plant Acq Adj	-	-	-	-	-	-
40 Nuclear Fuel	-	-	-	-	-	-
41 Prepayments	-	-	-	-	-	-
42 Fuel Stock	-	-	-	-	-	-
43 Material & Supplies	-	-	-	-	-	-
44 Working Capital	(139,082)	(149,986)	(3,803)	19,157	(6,369)	1,920
45 Weatherization Loans	-	-	-	-	-	-
46 Misc Rate Base	-	-	-	-	-	-
47						
48 Total Electric Plant:	(139,082)	(149,986)	(3,803)	19,157	(6,369)	1,920
49						
50 Rate Base Deductions:						
51 Accum Prov For Deprec	-	-	-	-	-	-
52 Accum Prov For Amort	-	-	-	-	-	-
53 Accum Def Income Tax	-	-	-	-	-	-
54 Unamortized ITC	-	-	-	-	-	-
55 Customer Adv For Const	-	-	-	-	-	-
56 Customer Service Deposits	-	-	-	-	-	-
57 Misc Rate Base Deductions	-	-	-	-	-	-
58						
59 Total Rate Base Deductions	-	-	-	-	-	-
60						
61 Total Rate Base:	(139,082)	(149,986)	(3,803)	19,157	(6,369)	1,920
62						
63 Return on Rate Base	-0.946%	-1.020%	-0.026%	0.130%	-0.043%	0.013%
64						
65 Return on Equity	-1.811%	-1.953%	-0.050%	0.249%	-0.083%	0.025%
66						
67 TAX CALCULATION:						
68 Operating Revenue	(59,850,924)	(64,543,148)	(1,636,748)	8,243,703	(2,740,971)	826,240
69 Other Deductions	-	-	-	-	-	-
70 Interest (AFUDC)	-	-	-	-	-	-
71 Interest	(3,132)	(3,378)	(86)	431	(143)	43
72 Schedule "M" Additions	-	-	-	-	-	-
73 Schedule "M" Deductions	-	-	-	-	-	-
74 Income Before Tax	(59,847,792)	(64,539,771)	(1,636,662)	8,243,272	(2,740,828)	826,197
75						
76 State Income Taxes	(2,717,090)	(2,930,106)	(74,304)	374,245	(124,434)	37,509
77 Taxable Income	(57,130,702)	(61,609,665)	(1,562,358)	7,869,027	(2,616,394)	788,688
78						
79 Federal Income Taxes + Other	(11,997,447)	(12,938,030)	(328,095)	1,652,496	(549,443)	165,624
APPROXIMATE PRICE CHANGE	61,914,993	66,768,011	1,692,836	(8,526,200)	2,834,899	(854,554)

**PacifiCorp  
Oregon General Rate Case - December 2023  
Pro Forma Revenue Adjustment**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Revenue:</b>							
Residential	440	3	(47,177,520)	OR	Situs	(47,177,520)	3.1.1_R
Commercial	442	3	(5,890,164)	OR	Situs	(5,890,164)	3.1.1_R
Industrial <sup>1</sup>	442	3	(9,960,420)	OR	Situs	(9,960,420)	3.1.1_R
Public St. & Hwy	444	3	(1,515,044)	OR	Situs	(1,515,044)	3.1.1_R
Total			<u>(64,543,148)</u>			<u>(64,543,148)</u>	3.1.1_R

<sup>1</sup>Includes Irrigation

**Description of Adjustment:**

This adjustment normalizes general business revenues by adjusting to the pro forma revenue level for the 12 months ending December 2023 based on forecasted loads. Page 3.1.4\_R shows a breakout between the TAM and general rate case revenues.

*This adjustment has been updated as described in the Reply Testimony of Company witness Mr. Robert M. Meredith.*



PacificCorp  
Oregon General Rate Case - December 2023  
Pro Forma Revenue Adjustment  
Actual 12 Months Ended June 2021  
Forecast 12 Months Ending December 2023

	A	B	C	D	E	F	G	H	I	J	K	L	M
	Total Revenue	Normalizing Adjustments <sup>1</sup> (305 Report)	Unadjusted Revenues	Remove Tariff Riders <sup>1</sup>	Actual Base Rate Revenues	Normalizing Adjustments <sup>2</sup>	Temperature Normalization	Total Type 1 Adjusted Revenue	Type 2 Annualized Price Change <sup>3</sup>	Total Type 2 Adjusted Revenue	Type 3 Pro Forma Price Change <sup>4</sup>	Total Oregon Forecast Revenue	Total Adjustment
Residential	\$643,283,576	\$15,559,040	\$658,842,617	(\$4,028,670)	\$654,813,947	(\$4,865,957)	(\$1,359,796)	\$648,588,195	(\$21,750,766)	\$626,837,429	(\$15,172,332)	\$611,665,097	(\$47,177,520)
Commercial	\$513,275,771	(\$16,105,796)	\$497,169,975	(\$10,760,501)	\$486,409,474	(\$1,657,701)	(\$3,180,119)	\$481,571,654	(\$19,779,388)	\$461,792,266	\$29,487,544	\$491,279,810	(\$5,860,164)
Industrial	\$118,599,710	(\$2,417,253)	\$116,182,457	(\$3,459,754)	\$112,722,703	\$4,832,059	\$0	\$117,554,763	(\$2,579,332)	\$114,975,431	(\$11,348,317)	\$103,627,113	(\$12,555,344)
Irrigation	\$30,442,034	(\$104,487)	\$30,337,548	(\$191,256)	\$30,146,292	\$2,401,471	(\$1,379,464)	\$31,168,299	(\$597,019)	\$30,571,280	\$2,361,192	\$32,932,472	\$2,594,924
Public St & Hwy	\$5,982,047	(\$175,520)	\$5,806,526	(\$11,596)	\$5,794,930	(\$1,206,366)	\$0	\$4,588,564	(\$173,868)	\$4,414,697		\$4,291,482	(\$1,515,044)
Total Oregon	\$1,311,583,139	(\$3,244,016)	\$1,308,339,123	(\$18,451,776)	\$1,289,887,347	(\$496,483)	(\$5,819,378)	\$1,283,471,475	(\$44,860,373)	\$1,238,591,103	\$5,204,872	\$1,243,795,975	(\$64,543,148)
Source / Formula	305 Report			Ref. 3.1.8.R - B	C + D	Ref. 3.1.9	Ref. 3.1.9.R	E + F + G	Ref. 3.1.9.R	H + I	Ref. 3.1.9.R	J + K	L - C To 3.1.R

<sup>1</sup> Solar Feed-in Revenue, Gain on Sale of Asset, Revenue Accounting Adjustments, Customer Bill Credits, Community Solar Revenue, Other Customer Retail Revenue, Revenue Adjustment 1&D Reserve, DSM, Blue Sky, Income Tax Deferral Adjustments BPA (Sch 98), Pilot Program Cost Adjustment (Sch 95), Oregon Corporate Activities Tax Recovery Adjustment (104), Replaced Meter Deferred Amounts Adjustment (194), Federal Tax Act Adjustment (195), Deer Creek Mine Closure Deferred Amounts Adjustment (Sch 198), Renewable Resource Deferral Adjustment (Sch 203), Oregon Solar Incentive Program (Sch 204) and Community Solar Adjustment (207).

<sup>2</sup> Removal of Irrigation Demand Charge Accrual (net zero for calendar year), Rate Mitigation Adjustment (299), & Out of Period adjustment

<sup>3</sup> Includes rate changes for: Renewable Adjustment Clause (RAC) and Transition Adjustment Mechanism (TAM) effective September 18, 2020; PAC effective November 1, 2020; TAM effective December 11, 2020; General Rate Case (GRC) and TAM effective January 1, 2021; GRC update effective January 12, 2021; GRC update effective April 9, 2021. Includes adjustment bringing direct access consumers to cost of service.

<sup>4</sup> TAM rate change effective January 1, 2022; adjustment to forecast.

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Present TAM Revenues In Rates**  
**Forecast 12 Months Ended December 31, 2023**

Base Rate Schedule	MWH	TAM Collection (Schedule 201 Revenue)
4	5,633,856	\$123,221,632
23	1,137,011	\$23,580,111
28	1,992,271	\$41,574,167
30	1,281,581	\$26,124,496
41	234,973	\$4,638,363
47	29,109	\$530,243
48	3,584,056	\$68,462,168
848	0	\$0
15	8,260	\$69,726
51	23,893	\$235,901
53	11,452	\$95,050
54	1,141	\$9,472
<b>Total</b>	<b>13,937,602</b>	<b>\$288,541,329</b>

Comparison to UE 390	MWH	Approved TAM
2022 Test Period	13,592,146	\$282,127,243
Difference resulting from change in test period	345,457	\$6,414,086
Percentage Change	2.5%	2.3%

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Revenue split between TAM and GRC Pro forma Revenue**

Total Revenue - 2023	TAM/ NPC	NON-TAM / NON NPC
\$1,243,795,975	\$288,541,329	\$955,254,646
Ref 3.1.1_R	Ref 3.1.3_R	

The above calculation shows the split of proforma revenue between the TAM and the General Rate Case.

	CUSTOMERS				KWH				
	305 Average Customers	Adjustment Customers	Forecast Customers	305 Booked kWh	Type 1				
					Normalizing Adjustment kWh	Temperature Adjustments kWh	Type 1 Adjustments kWh	Total Type 1 Adjusted kWh	
<b>Residential</b>									
15	2,295	-153	2,143	1,962,387				1,966,486	
4	521,249	13,810	535,059	5,770,434,457	(1,061,801)	(13,615,937)	(14,677,738)	5,755,756,719	
23	17,260	458	17,718	98,924,861	(37,972)	(383,917)	(421,889)	98,502,972	
28	232	8	239	44,978,994	2,485		2,485	44,981,479	
BPA Balancing Account	0			0				0	
Solar Feed-In Revenue	0			0				0	
Gain on Sale of Asset	0			0				0	
Revenue Accounting Adjustment	0			0				0	
Customer Bill Credits	0			0				0	
Community Solar Revenue	0			0				0	
Revenue Adjustment - I&D Reserve	0			0				0	
DSM	0			0				0	
Blue Sky	0			0				0	
Income Tax Deferral Adjustments	0			0				0	
Unbilled	0			792,000				792,000	
Paperless Credit	0			0				0	
AGA	0			0				0	
<b>Total Residential</b>	<b>541,036</b>	<b>14,122</b>	<b>555,159</b>	<b>5,917,092,699</b>	<b>(1,093,189)</b>	<b>(13,999,854)</b>	<b>(15,093,043)</b>	<b>5,901,999,656</b>	
<b>Commercial</b>									
15	3,645	-128	3,517	6,325,989	(5,615)		(5,615)	6,320,374	
23	64,797	829	65,626	1,064,697,024	214,380	(9,360,496)	(9,146,116)	1,055,550,908	
28	9,582	235	9,817	1,885,457,787	(9,098)	(17,843,223)	(17,852,321)	1,867,605,466	
30	681	-14	667	1,026,338,858	(610,619)	(10,452,794)	(11,063,413)	1,015,275,445	
47	5	0	5	27,647,250	(1,141,500)		(1,141,500)	26,505,750	
48	103	0	103	1,471,512,543	2,108,800	(15,434,743)	(13,325,943)	1,458,186,600	
54	102	0	102	1,308,442	2,091		2,091	1,310,533	
BPA Balancing Account	0			0				0	
Solar Feed-In Revenue	0			0				0	
Gain on Sale of Asset	0			0				0	
Revenue Accounting Adjustment	0			0				0	
Customer Bill Credits	0			0				0	
Community Solar Revenue	0			0				0	
Other Customer Retail Rev	0			0				0	
Revenue Adjustment - I&D Reserve	0			0				0	
DSM	0			0				0	
Blue Sky	0			0				0	
Income Tax Deferral Adjustments	0			0				0	
Unbilled	0			140,457,000				140,457,000	
Paperless Credit	0			0				0	
AGA	0			0				0	
<b>Total Commercial</b>	<b>78,916</b>	<b>921</b>	<b>79,837</b>	<b>5,623,744,893</b>	<b>558,439</b>	<b>(53,091,256)</b>	<b>(52,532,817)</b>	<b>5,571,212,076</b>	
<b>Industrial</b>									
15	115	-1	114	243,549	412		412	243,961	
23	976	-6	970	17,980,256	10,389	0	10,389	17,990,645	
28	404	2	406	81,679,641	(84,584)	0	(84,584)	81,595,057	
30	128	2	130	176,724,046	14,680		14,680	176,738,726	
47	1	0	1	2,230,154	0		0	2,230,154	
48	83	0	83	1,270,091,830	3,539,400		3,539,400	1,273,631,230	
BPA Balancing Account	0			0				0	
Solar Feed-In Revenue	0			0				0	
Gain on Sale of Asset	0			0				0	
Revenue Accounting Adjustment	0			0				0	
Customer Bill Credits	0			0				0	
Community Solar Revenue	0			0				0	
Revenue Adjustment - I&D Reserve	0			0				0	
DSM	0			0				0	
Blue Sky	0			0				0	
Income Tax Deferral Adjustments	0			0				0	
Unbilled	0			14,799,000				14,799,000	
Paperless Credit	0			0				0	
AGA	0			0				0	
<b>Total Industrial</b>	<b>1,708</b>	<b>(4)</b>	<b>1,704</b>	<b>1,563,748,476</b>	<b>3,480,297</b>	<b>0</b>	<b>3,480,297</b>	<b>1,567,228,773</b>	
<b>Irrigation</b>									
41	7,981	17	7,998	234,978,837	2,358,472	(13,095,200)	(10,736,728)	224,242,109	
23	1	0	1	4,255	629		629	4,884	
48	5	0	5	58,858,400	1,920,000	(1,857,785)	62,215	58,920,615	
BPA Balancing Account	0			0				0	
BPA Adjustment	0			0				0	
Demand Charge Accrual	0			0				0	
Solar Feed-In Revenue	0			0				0	
Gain on Sale of Asset	0			0				0	
Revenue Accounting Adjustment	0			0				0	
Community Solar Revenue	0			0				0	
Revenue Adjustment - I&D Reserve	0			0				0	
DSM	0			0				0	
Blue Sky	0			0				0	
Income Tax Deferral Adjustments	0			0				0	
Unbilled	0			20,029,000				20,029,000	
Paperless Credit	0			0				0	
AGA	0			0				0	
<b>Total Irrigation</b>	<b>7,987</b>	<b>17</b>	<b>8,004</b>	<b>313,870,492</b>	<b>4,279,101</b>	<b>(14,952,985)</b>	<b>(10,673,884)</b>	<b>303,196,608</b>	
<b>Lighting</b>									
15	36	0	36	55,138				55,138	
23	14	0	14	596,326	0			596,326	
50	94	-94		3,494,666	0			3,494,666	
51	1,004	104	1,108	23,018,466	(1,161,751)		(1,161,751)	21,856,715	
52		-16		135,913	0			135,913	
53	313	1	314	11,373,465	(632,376)		(632,376)	10,741,089	
Solar Feed-In Revenue	0			0				0	
Gain on Sale of Asset	0			0				0	
Revenue Accounting Adjustment	0			0				0	
Community Solar Revenue	0			0				0	
Revenue Adjustment - I&D Reserve	0			0				0	
DSM	0			0				0	
Blue Sky	0			0				0	
Income Tax Deferral Adjustments	0			0				0	
Unbilled	0			(164,000)				(164,000)	
Paperless Credit	0			0				0	
AGA	0			0				0	
<b>Total Lighting</b>	<b>1,477</b>	<b>(5)</b>	<b>1,472</b>	<b>38,509,974</b>	<b>(1,794,127)</b>	<b>0</b>	<b>(1,794,127)</b>	<b>36,715,847</b>	
<b>TOTAL COMPANY</b>	<b>631,123</b>	<b>15,052</b>	<b>646,176</b>	<b>13,456,966,534</b>	<b>5,430,521</b>	<b>(82,044,096)</b>	<b>(76,613,575)</b>	<b>13,380,352,959</b>	



REVENUES						
	Temperature Adjustment \$	Total Type 1 Adjusted Revenues	Type 2		Type 3	
			Type 2 Adjustments \$	Total Type 2 Adjusted Revenues	Type 3 Adjustments \$	Total Adjusted Revenues
<b>Residential</b>						
15		\$273,959	(\$19,955)	\$254,004	(\$266)	\$253,738
4	(\$1,324,480)	\$632,946,861	(\$19,533,743)	\$613,413,118	(\$16,690,537)	\$596,722,581
23	(\$35,315)	\$13,037,246	(\$113,577)	\$12,923,669	(\$230,770)	\$12,692,899
28	\$0	\$3,809,961	(\$227,351)	\$3,582,610	\$264,241	\$3,846,851
BPA Balancing Account		\$0	\$0	\$0	\$0	\$0
Solar Feed-In Revenue		\$0	\$0	\$0	\$0	\$0
Gain on Sale of Asset		\$0	\$0	\$0	\$0	\$0
Revenue Accounting Adjustment		\$0	\$0	\$0	\$0	\$0
Customer Bill Credits		\$0	\$0	\$0	\$0	\$0
Community Solar Revenue		\$0	\$0	\$0	\$0	\$0
Revenue Adjustment - I&D Reserve		\$0	\$0	\$0	\$0	\$0
DSM		\$0	\$0	\$0	\$0	\$0
Blue Sky		\$0	\$0	\$0	\$0	\$0
Income Tax Deferral Adjustments		\$0	\$0	\$0	\$0	\$0
Unbilled		(\$1,485,000)		(\$1,485,000)	\$1,485,000	\$0
Paperless Credit		\$0	(\$1,856,140)	(\$1,856,140)		(\$1,856,140)
AGA		\$5,168		\$5,168		\$5,168
<b>Total Residential</b>	<b>(\$1,359,796)</b>	<b>\$648,588,195</b>	<b>(\$21,750,766)</b>	<b>\$626,837,429</b>	<b>(\$15,172,332)</b>	<b>\$611,665,097</b>
<b>Commercial</b>						
15		\$751,031	(\$148,662)	\$602,369	\$30,554	\$632,923
23	(\$848,240)	\$115,095,840	(\$1,024,198)	\$114,071,642	(\$4,271,707)	\$109,799,935
28	(\$1,073,910)	\$163,342,866	(\$7,724,076)	\$155,618,790	(\$2,644,988)	\$152,973,802
30	(\$507,841)	\$80,682,324	(\$3,010,104)	\$77,672,220	\$2,522,018	\$80,194,238
47		\$3,264,339	(\$124,335)	\$3,140,004	\$41,109	\$3,181,113
48	(\$750,127)	\$105,228,955	(\$7,540,973)	\$97,687,982	\$43,694,976	\$141,382,958
54		\$101,166	(\$8,113)	\$93,053	(\$11,418)	\$81,635
BPA Balancing Account		\$0	\$0	\$0	\$0	\$0
Solar Feed-In Revenue		\$0	\$0	\$0	\$0	\$0
Gain on Sale of Asset		\$0	\$0	\$0	\$0	\$0
Revenue Accounting Adjustment		\$0	\$0	\$0	\$0	\$0
Customer Bill Credits		\$0	\$0	\$0	\$0	\$0
Community Solar Revenue		\$0	\$0	\$0	\$0	\$0
Other Customer Retail Rev		\$0	\$0	\$0	\$0	\$0
Revenue Adjustment - I&D Reserve		\$0	\$0	\$0	\$0	\$0
DSM		\$0	\$0	\$0	\$0	\$0
Blue Sky		\$0	\$0	\$0	\$0	\$0
Income Tax Deferral Adjustments		\$0	\$0	\$0	\$0	\$0
Unbilled		\$9,873,000		\$9,873,000	(\$9,873,000)	\$0
Paperless Credit		\$0	(\$198,928)	(\$198,928)		(\$198,928)
AGA		\$3,232,134		\$3,232,134		\$3,232,134
<b>Total Commercial</b>	<b>(\$3,180,119)</b>	<b>\$481,571,654</b>	<b>(\$19,779,388)</b>	<b>\$461,792,266</b>	<b>\$29,487,544</b>	<b>\$491,279,810</b>
<b>Industrial</b>						
15		\$25,863	(\$6,543)	\$19,320	\$1,842	\$21,162
23	\$0	\$1,985,640	(\$16,168)	\$1,969,472	(\$157,753)	\$1,811,719
28	\$0	\$7,693,210	(\$384,882)	\$7,308,328	(\$396,887)	\$6,911,441
30		\$15,457,678	(\$448,839)	\$15,008,839	(\$1,006,476)	\$14,002,363
47		\$904,273	(\$27,126)	\$877,147	(\$84,391)	\$792,756
48		\$89,985,461	(\$1,692,424)	\$88,293,037	(\$8,314,652)	\$79,978,385
BPA Balancing Account		\$0	\$0	\$0	\$0	\$0
Solar Feed-In Revenue		\$0	\$0	\$0	\$0	\$0
Gain on Sale of Asset		\$0	\$0	\$0	\$0	\$0
Revenue Accounting Adjustment		\$0	\$0	\$0	\$0	\$0
Customer Bill Credits		\$0	\$0	\$0	\$0	\$0
Community Solar Revenue		\$0	\$0	\$0	\$0	\$0
Revenue Adjustment - I&D Reserve		\$0	\$0	\$0	\$0	\$0
DSM		\$0	\$0	\$0	\$0	\$0
Blue Sky		\$0	\$0	\$0	\$0	\$0
Income Tax Deferral Adjustments		\$0	\$0	\$0	\$0	\$0
Unbilled		\$1,390,000		\$1,390,000	(\$1,390,000)	\$0
Paperless Credit		\$0	(\$3,351)	(\$3,351)		(\$3,351)
AGA		\$112,639		\$112,639		\$112,639
<b>Total Industrial</b>	<b>\$0</b>	<b>\$117,554,763</b>	<b>(\$2,579,332)</b>	<b>\$114,975,431</b>	<b>(\$11,348,317)</b>	<b>\$103,627,113</b>
<b>Irrigation</b>						
41	(\$1,283,779)	\$25,363,097	(\$295,597)	\$25,067,500	\$913,583	\$25,981,083
23	\$0	\$871	(\$230)	\$641	(\$129)	\$512
48	(\$95,685)	\$4,428,248	(\$290,257)	\$4,137,991	\$2,652,738	\$6,790,729
BPA Balancing Account		\$0	\$0	\$0	\$0	\$0
BPA Adjustment		\$0	\$0	\$0	\$0	\$0
Demand Charge Accrual		\$0	\$0	\$0	\$0	\$0
Solar Feed-In Revenue		\$0	\$0	\$0	\$0	\$0
Gain on Sale of Asset		\$0	\$0	\$0	\$0	\$0
Revenue Accounting Adjustment		\$0	\$0	\$0	\$0	\$0
Community Solar Revenue		\$0	\$0	\$0	\$0	\$0
Revenue Adjustment - I&D Reserve		\$0	\$0	\$0	\$0	\$0
DSM		\$0	\$0	\$0	\$0	\$0
Blue Sky		\$0	\$0	\$0	\$0	\$0
Income Tax Deferral Adjustments		\$0	\$0	\$0	\$0	\$0
Unbilled		\$1,205,000		\$1,205,000	(\$1,205,000)	\$0
Paperless Credit		\$0	(\$10,936)	(\$10,936)		(\$10,936)
AGA		\$171,083		\$171,083		\$171,083
<b>Total Irrigation</b>	<b>(\$1,379,464)</b>	<b>\$31,168,299</b>	<b>(\$597,019)</b>	<b>\$30,571,280</b>	<b>\$2,361,192</b>	<b>\$32,932,472</b>
<b>Lighting</b>						
15		\$8,350	(\$1,610)	\$6,740	\$482	\$7,222
23		\$139,176	\$257	\$139,433	(\$6,354)	\$133,079
50		\$391,246	(\$391,246)	\$0	\$0	\$0
51		\$3,424,821	\$142,062	\$3,566,883	(\$69,325)	\$3,497,558
52		\$17,964	(\$17,964)	\$0	\$0	\$0
53		\$648,008	\$97,769	\$745,777	(\$89,017)	\$656,760
Solar Feed-In Revenue		\$0	\$0	\$0	\$0	\$0
Gain on Sale of Asset		\$0	\$0	\$0	\$0	\$0
Revenue Accounting Adjustment		\$0	\$0	\$0	\$0	\$0
Community Solar Revenue		\$0	\$0	\$0	\$0	\$0
DSM		\$0	\$0	\$0	\$0	\$0
Income Tax Deferral Adjustments		\$0	\$0	\$0	\$0	\$0
Unbilled		(\$41,000)		(\$41,000)	\$41,000	\$0
Paperless Credit		\$0	(\$3,136)	(\$3,136)		(\$3,136)
AGA		\$0	\$0	\$0	\$0	\$0
<b>Total Lighting</b>	<b>\$0</b>	<b>\$4,588,564</b>	<b>(\$173,868)</b>	<b>\$4,414,697</b>	<b>(\$123,215)</b>	<b>\$4,291,482</b>
<b>TOTAL COMPANY</b>	<b>(\$5,919,378)</b>	<b>\$1,283,471,475</b>	<b>(\$44,880,373)</b>	<b>\$1,238,591,103</b>	<b>\$5,204,872</b>	<b>\$1,243,795,975</b>



	Actual Revenues	Demand Accrual	Sm-289 Accrual	Out of Period Adjust	Subtotal Adjustment	Transaction Adjustment	Total Type 1 Revenue	Type 2 Price Changes	Total Type 2 Adjust.	Type 3 Price Changes	Total Type 3 Adjust.	Total Type 3 Revenue
<b>Residential</b>												
15	\$265,005			\$12	(\$5,017)		\$270,000					\$270,000
23	\$638,277,936			(\$201,549)	(\$4,521,294)	(\$1,324,480)	\$636,432,713					\$636,432,713
28	\$3,922,648			(\$1,358)	(\$211,259)	(\$35,415)	\$3,919,972					\$3,919,972
BPA Balancing Account	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Solar Feed-In Revenue	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Gain on Sale of Asset	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Adjustment	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Community Solar Revenue	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Adjustment - I&D Reserve	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Income Tax Deferral Adjustments	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Blue Sky	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Papirus Credit	\$0	\$0		\$0	\$0	\$0	\$0					\$0
<b>Total Residential</b>	<b>\$664,913,947</b>	<b>\$0</b>	<b>(\$4,666,316)</b>	<b>(\$209,641)</b>	<b>(\$4,465,057)</b>	<b>(\$1,339,796)</b>	<b>\$658,583,195</b>	<b>(\$21,750,766)</b>	<b>(\$21,750,766)</b>	<b>(\$6,895,612)</b>	<b>(\$18,855,154)</b>	<b>\$639,728,041</b>
<b>Commercial</b>												
15	\$853,285			(\$941)	(\$102,254)		\$852,344					\$852,344
23	\$1,980,490			(\$1,463)	(\$270,724)	(\$58,916)	\$1,978,060					\$1,978,060
28	\$4,632,985			(\$1,481)	(\$1,073,910)	(\$325,910)	\$4,630,004					\$4,630,004
BPA Balancing Account	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Gain on Sale of Asset	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Accounting Adjustment	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Customer Bill Credits	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Community Solar Revenue	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Adjustment - I&D Reserve	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Income Tax Deferral Adjustments	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Blue Sky	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Papirus Credit	\$0	\$0		\$0	\$0	\$0	\$0					\$0
<b>Total Commercial</b>	<b>\$8,469,260</b>	<b>\$0</b>	<b>(\$4,666,316)</b>	<b>(\$209,641)</b>	<b>(\$4,465,057)</b>	<b>(\$1,339,796)</b>	<b>\$8,469,260</b>	<b>(\$21,750,766)</b>	<b>(\$21,750,766)</b>	<b>(\$6,895,612)</b>	<b>(\$18,855,154)</b>	<b>\$8,469,260</b>
<b>Industrial</b>												
15	\$29,646			\$53	(\$3,783)		\$25,916					\$25,916
23	\$2,022,602			\$1,019	(\$36,693)	\$0	\$2,023,630					\$2,023,630
28	\$1,515,554			(\$1,481)	(\$1,073,910)		\$1,514,073					\$1,514,073
BPA Balancing Account	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Gain on Sale of Asset	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Accounting Adjustment	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Customer Bill Credits	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Community Solar Revenue	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Adjustment - I&D Reserve	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Income Tax Deferral Adjustments	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Blue Sky	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Papirus Credit	\$0	\$0		\$0	\$0	\$0	\$0					\$0
<b>Total Industrial</b>	<b>\$4,837,802</b>	<b>\$0</b>	<b>(\$4,666,316)</b>	<b>(\$209,641)</b>	<b>(\$4,465,057)</b>	<b>(\$1,339,796)</b>	<b>\$4,837,802</b>	<b>(\$21,750,766)</b>	<b>(\$21,750,766)</b>	<b>(\$6,895,612)</b>	<b>(\$18,855,154)</b>	<b>\$4,837,802</b>
<b>Irrigation</b>												
15	\$115,562			\$0	\$0		\$115,562					\$115,562
23	\$2,077,338			\$208,896	\$2,286,234	(\$1,283,779)	\$2,011,351					\$2,011,351
28	\$182,638			\$130,355	\$312,993	(\$6,695)	\$186,700					\$186,700
BPA Balancing Account	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Gain on Sale of Asset	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Accounting Adjustment	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Customer Bill Credits	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Community Solar Revenue	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Adjustment - I&D Reserve	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Income Tax Deferral Adjustments	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Blue Sky	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Papirus Credit	\$0	\$0		\$0	\$0	\$0	\$0					\$0
<b>Total Irrigation</b>	<b>\$2,275,538</b>	<b>\$0</b>	<b>(\$4,666,316)</b>	<b>(\$209,641)</b>	<b>(\$4,465,057)</b>	<b>(\$1,339,796)</b>	<b>\$2,275,538</b>	<b>(\$21,750,766)</b>	<b>(\$21,750,766)</b>	<b>(\$6,895,612)</b>	<b>(\$18,855,154)</b>	<b>\$2,275,538</b>
<b>Lighting</b>												
15	\$9,284			\$10	(\$54)		\$9,338					\$9,338
23	\$140,446			\$5	(\$1,270)		\$139,181					\$139,181
28	\$21,009			(\$24,537)	(\$916,723)	(\$142,062)	\$1,970,915					\$1,970,915
BPA Balancing Account	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Gain on Sale of Asset	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Accounting Adjustment	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Community Solar Revenue	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Revenue Adjustment - I&D Reserve	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Income Tax Deferral Adjustments	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Blue Sky	\$0	\$0		\$0	\$0	\$0	\$0					\$0
Papirus Credit	\$0	\$0		\$0	\$0	\$0	\$0					\$0
<b>Total Lighting</b>	<b>\$171,745</b>	<b>\$0</b>	<b>(\$4,666,316)</b>	<b>(\$209,641)</b>	<b>(\$4,465,057)</b>	<b>(\$1,339,796)</b>	<b>\$171,745</b>	<b>(\$21,750,766)</b>	<b>(\$21,750,766)</b>	<b>(\$6,895,612)</b>	<b>(\$18,855,154)</b>	<b>\$171,745</b>
<b>TOTAL COMPANY</b>	<b>\$1,289,887,247</b>	<b>\$0</b>	<b>(\$4,666,316)</b>	<b>(\$209,641)</b>	<b>(\$4,465,057)</b>	<b>(\$1,339,796)</b>	<b>\$1,285,471,654</b>	<b>(\$44,880,772)</b>	<b>(\$44,880,772)</b>	<b>(\$14,911,041)</b>	<b>(\$14,911,041)</b>	<b>\$1,270,560,613</b>



**PacifiCorp  
Oregon General Rate Case - December 2023  
REC Revenue**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Revenue:</b>							
Remove:							
June 2021 Booked Revenues (Including Accruals)	456	1	(9,033,788)	SG	26.002%	(2,348,944)	3.2.1
June 2021 REC Deferrals	456	1	2,739,416	SG	26.002%	712,296	3.2.1
June 2021 Leaning Juniper Indemnity	456	1	(385)	SG	26.002%	(100)	3.2.1

**Description of Adjustment:**

This adjustment removes all REC revenues as booked during the 12 months ended June 2021. Most of Oregon's share of the renewable energy credits (RECs) are banked for compliance; however, not all RECs meet the Oregon RPS qualifications. Oregon's revenues from RPS ineligible RECs that are sold are passed backed to customers through the Oregon property sales balancing account per Commission Order No. 10-210 in Docket UP 260. This adjustment also removes REC Deferrals from the 12 months ended June 2021.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp  
Oregon General Rate Case - December 2023  
Wheeling Revenue**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Revenue:</b>							
Other Electric Revenues	456	1	1,427,746	SG	26.002%	371,239	3.3.1
Other Electric Revenues	456	2	(480,136)	SG	26.002%	(124,844)	3.3.1
Other Electric Revenues	456	3	30,756,795	SG	26.002%	7,997,308	3.3.1
			<u>31,704,404</u>				
<b>Adjustment Detail:</b>							
Actual Wheeling Revenues 12 ME June 2021			129,760,988				3.3.1
Total Adjustments			<u>31,704,404</u>				Above
Adjusted Wheeling Revenues 12 ME December 2023			<u>161,465,392</u>				3.3.1

**Description of Adjustment:**

This adjustment removes out-of-period and one-time adjustments from wheeling revenues recorded in 12 months ended June 2021 and adds in pro forma changes through December 2023.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Ancillary Revenues**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Revenues:</b>							
Ancillary Contract Renewal	456	1	(10,541,483)	SG	26.002%	(2,740,971)	3.4.1

**Description of Adjustment:**

This adjustment includes ancillary revenue contract changes that are included in the net power cost study.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Fly Ash Revenue**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Revenues:</b>							
Ash Sales Revenue	456	2	3,177,631	SG	26.002%	826,240	Below

**Adjustment Detail:**

12 Months Ended June 2021	12,187,273
12 Months under New Contract Terms	15,364,905
Adjustment	<u>3,177,631</u>

**Description of Adjustment:**

The recently executed contract for fly ash from Jim Bridger plant resulted in an increase to ash sales revenues starting in October 2020. This adjustment normalizes the revenue to an annualized basis on the new contract terms.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

## Tab 4 - Operation & Maintenance Expense

**PacifiCorp**  
**Oregon General Rate Case – December 2023**  
**Operation & Maintenance Expense Adjustment Index**

The Company's June 2021 actual O&M expenses are the basis for the test period O&M expenses. These actual expenses are adjusted for various normalizing items including labor costs, non-labor operation and maintenance, and inflation to reflect the appropriate level of on-going costs that the Company expects to incur during the December 2023 test period. The following adjustments are included:

- 4.1\_R Miscellaneous General Expenses & Revenues – Revised for allocation factor impact only
- 4.2\_R Wages & Employee Benefits
- 4.3\_R Pension Related Non-Service Expense
- 4.4\_R Remove Non-Recurring Entries – Revised for allocation factor impact only
- 4.5\_R Insurance Expense – Revised for allocation factor impact only
- 4.6\_R Generation Overhaul Expense
- 4.7\_R Revenue Sensitive Items & Uncollectible Expense
- 4.8\_R Membership & Subscriptions – Revised for allocation factor impact only
- 4.9\_R Meals and Entertainment Adjustment – Revised for allocation factor impact only
- 4.10\_R O&M Expense Escalation
- 4.11\_R Wildfire & Veg Management Expenses – Revised for allocation factor impact only
- 4.12\_R Utah Schedule 34 Transmission Reallocation – Revised for allocation factor impact only

**Pacificorp**  
**Oregon General Rate Case - December 2023**  
**Tab 4 Adjustment Summary**

	Total Adjustments	4.1_R Miscellaneous General Expenses & Revenues	4.2_R Wage & Employee Benefits Adjustment	4.3_R Pension Related Non Service Expense	4.4_R Remove Non- Recurring Entries	4.5_R Insurance Expense	4.6_R Generation Overhaul Expense
1 Operating Revenues:							
2 General Business Revenues	1,766,619	1,766,619	-	-	-	-	-
3 Interdepartmental	-	-	-	-	-	-	-
4 Special Sales	-	-	-	-	-	-	-
5 Other Operating Revenues	-	-	-	-	-	-	-
6 Total Operating Revenues	<u>1,766,619</u>	<u>1,766,619</u>	-	-	-	-	-
7							
8 Operating Expenses:							
9 Steam Production	6,978,517	-	1,753,414	-	-	-	153,665
10 Nuclear Production	-	-	-	-	-	-	-
11 Hydro Production	(7,636,369)	-	369,511	-	(8,580,581)	-	-
12 Other Power Supply	3,243,585	(652)	664,408	-	-	-	823,787
13 Transmission	692,526	-	547,108	-	-	-	-
14 Distribution	27,891,214	-	3,050,141	-	-	-	-
15 Customer Accounting	1,628,035	(14,359)	607,003	-	-	-	-
16 Customer Service & Info	343,920	22,789	194,963	-	-	-	-
17 Sales	-	-	-	-	-	-	-
18 Administrative & General	(22,636,322)	346,645	890,459	2,366,192	-	(27,844,434)	-
19							
20 Total O&M Expenses	<u>10,505,107</u>	<u>354,422</u>	<u>8,077,008</u>	<u>2,366,192</u>	<u>(8,580,581)</u>	<u>(27,844,434)</u>	<u>977,452</u>
21							
22 Depreciation	-	-	-	-	-	-	-
23 Amortization	-	-	-	-	-	-	-
24 Taxes Other Than Income	(1,555,006)	-	-	-	-	-	-
25 Income Taxes - Federal	425,610	262,501	(1,619,425)	(474,417)	1,720,391	7,469,286	(195,977)
26 Income Taxes - State	96,389	59,449	(366,755)	(107,442)	389,621	1,691,587	(44,383)
27 Income Taxes - Def Net	(2,473,765)	-	-	-	-	(2,473,765)	-
28 Investment Tax Credit Adj.	-	-	-	-	-	-	-
29 Misc Revenue & Expense	102,600	102,600	-	-	-	-	-
30							
31 Total Operating Expenses:	<u>7,100,936</u>	<u>778,972</u>	<u>6,090,827</u>	<u>1,784,333</u>	<u>(6,470,569)</u>	<u>(21,157,327)</u>	<u>737,091</u>
32							
33 Operating Rev For Return:	<u>(5,334,317)</u>	<u>987,647</u>	<u>(6,090,827)</u>	<u>(1,784,333)</u>	<u>6,470,569</u>	<u>21,157,327</u>	<u>(737,091)</u>
34							
35 Rate Base:							
36 Electric Plant In Service	-	-	-	-	-	-	-
37 Plant Held for Future Use	-	-	-	-	-	-	-
38 Misc Deferred Debits	-	-	-	-	-	-	-
39 Elec Plant Acq Adj	-	-	-	-	-	-	-
40 Nuclear Fuel	-	-	-	-	-	-	-
41 Prepayments	-	-	-	-	-	-	-
42 Fuel Stock	-	-	-	-	-	-	-
43 Material & Supplies	-	-	-	-	-	-	-
44 Working Capital	89,530	6,393	57,571	16,866	(61,160)	(176,597)	6,967
45 Weatherization Loans	-	-	-	-	-	-	-
46 Misc Rate Base	-	-	-	-	-	-	-
47							
48 Total Electric Plant:	<u>89,530</u>	<u>6,393</u>	<u>57,571</u>	<u>16,866</u>	<u>(61,160)</u>	<u>(176,597)</u>	<u>6,967</u>
49							
50 Rate Base Deductions:							
51 Accum Prov For Deprec	-	-	-	-	-	-	-
52 Accum Prov For Amort	-	-	-	-	-	-	-
53 Accum Def Income Tax	(9,413,907)	-	-	-	-	(9,413,907)	-
54 Unamortized ITC	-	-	-	-	-	-	-
55 Customer Adv For Const	-	-	-	-	-	-	-
56 Customer Service Deposits	-	-	-	-	-	-	-
57 Misc Rate Base Deductions	38,288,770	-	-	-	-	38,288,770	-
58							
59 Total Rate Base Deductions	<u>28,874,864</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>28,874,864</u>	<u>-</u>
60							
61 Total Rate Base:	<u>28,964,394</u>	<u>6,393</u>	<u>57,571</u>	<u>16,866</u>	<u>(61,160)</u>	<u>28,698,267</u>	<u>6,967</u>
62							
63 Return on Rate Base	-0.145%	0.021%	-0.128%	-0.037%	0.136%	0.408%	-0.015%
64							
65 Return on Equity	-0.278%	0.040%	-0.245%	-0.072%	0.260%	0.780%	-0.029%
66							
67 TAX CALCULATION:							
68 Operating Revenue	(7,286,082)	1,309,596	(8,077,008)	(2,366,192)	8,580,581	27,844,434	(977,452)
69 Other Deductions	-	-	-	-	-	-	-
70 Interest (AFUDC)	-	-	-	-	-	-	-
71 Interest	652,248	144	1,296	380	(1,377)	646,255	157
72 Schedule "M" Additions	10,061,436	-	-	-	-	10,061,436	-
73 Schedule "M" Deductions	-	-	-	-	-	-	-
74 Income Before Tax	<u>2,123,106</u>	<u>1,309,452</u>	<u>(8,078,304)</u>	<u>(2,366,572)</u>	<u>8,581,958</u>	<u>37,259,615</u>	<u>(977,609)</u>
75							
76 State Income Taxes	96,389	59,449	(366,755)	(107,442)	389,621	1,691,587	(44,383)
77 Taxable Income	<u>2,026,717</u>	<u>1,250,003</u>	<u>(7,711,549)</u>	<u>(2,259,130)</u>	<u>8,192,338</u>	<u>35,568,029</u>	<u>(933,225)</u>
78							
79 Federal Income Taxes + Other	<u>425,610</u>	<u>262,501</u>	<u>(1,619,425)</u>	<u>(474,417)</u>	<u>1,720,391</u>	<u>7,469,286</u>	<u>(195,977)</u>
APPROXIMATE PRICE CHANGE	10,284,735	(1,354,960)	8,360,875	2,449,352	(8,882,146)	(26,119,891)	1,011,805

**Pacificorp**  
Oregon General Rate Case - December 202:  
Tab 4 Adjustment Summary

	4.7_R Revenue Sensitive Items & Uncollectible Expense	4.8_R Memberships and Subscriptions	4.9_R Meals and Entertainment Adjustment	4.10_R O&M Expense Escalation	4.11_R Wildfire & Veg Management Expenses	4.12_R Utah Schedule34 Transmission Reallocation
1 Operating Revenues:						
2 General Business Revenues	-	-	-	-	-	-
3 Interdepartmental	-	-	-	-	-	-
4 Special Sales	-	-	-	-	-	-
5 Other Operating Revenues	-	-	-	-	-	-
6 Total Operating Revenues	-	-	-	-	-	-
7						
8 Operating Expenses:						
9 Steam Production	-	-	(431)	5,071,870	-	-
10 Nuclear Production	-	-	-	-	-	-
11 Hydro Production	-	-	(578)	575,279	-	-
12 Other Power Supply	-	-	(4,336)	1,760,378	-	-
13 Transmission	-	-	(269)	1,082,857	296,144	(1,233,314)
14 Distribution	-	-	(8,751)	(1,208,125)	26,057,949	-
15 Customer Accounting	(289,619)	-	(260)	1,325,270	-	-
16 Customer Service & Info	-	-	(3,405)	129,573	-	-
17 Sales	-	-	-	-	-	-
18 Administrative & General	(275,401)	(145,825)	(2,621)	2,028,662	-	-
19						
20 Total O&M Expenses	(565,020)	(145,825)	(20,651)	10,765,765	26,354,093	(1,233,314)
21	-	-	-	-	-	-
22 Depreciation	-	-	-	-	-	-
23 Amortization	-	-	-	-	-	-
24 Taxes Other Than Income	(1,555,006)	-	-	-	-	-
25 Income Taxes - Federal	425,061	29,238	4,141	(2,158,516)	(5,283,948)	247,277
26 Income Taxes - State	96,265	6,622	938	(488,844)	(1,196,668)	56,001
27 Income Taxes - Def Net	-	-	-	-	-	-
28 Investment Tax Credit Adj.	-	-	-	-	-	-
29 Misc Revenue & Expense	-	-	-	-	-	-
30						
31 Total Operating Expenses:	(1,598,700)	(109,966)	(15,573)	8,118,404	19,873,478	(930,035)
32						
33 Operating Rev For Return:	1,598,700	109,966	15,573	(8,118,404)	(19,873,478)	930,035
34						
35 Rate Base:						
36 Electric Plant In Service	-	-	-	-	-	-
37 Plant Held for Future Use	-	-	-	-	-	-
38 Misc Deferred Debits	-	-	-	-	-	-
39 Elec Plant Acq Adj	-	-	-	-	-	-
40 Nuclear Fuel	-	-	-	-	-	-
41 Prepayments	-	-	-	-	-	-
42 Fuel Stock	-	-	-	-	-	-
43 Material & Supplies	-	-	-	-	-	-
44 Working Capital	(15,111)	(1,039)	(147)	76,735	187,844	(8,791)
45 Weatherization Loans	-	-	-	-	-	-
46 Misc Rate Base	-	-	-	-	-	-
47						
48 Total Electric Plant:	(15,111)	(1,039)	(147)	76,735	187,844	(8,791)
49	-	-	-	-	-	-
50 Rate Base Deductions:						
51 Accum Prov For Deprec	-	-	-	-	-	-
52 Accum Prov For Amort	-	-	-	-	-	-
53 Accum Def Income Tax	-	-	-	-	-	-
54 Unamortized ITC	-	-	-	-	-	-
55 Customer Adv For Const	-	-	-	-	-	-
56 Customer Service Deposits	-	-	-	-	-	-
57 Misc Rate Base Deductions	-	-	-	-	-	-
58						
59 Total Rate Base Deductions	-	-	-	-	-	-
60						
61 Total Rate Base:	(15,111)	(1,039)	(147)	76,735	187,844	(8,791)
62						
63 Return on Rate Base	0.033%	0.002%	0.000%	-0.169%	-0.414%	0.019%
64						
65 Return on Equity	0.064%	0.004%	0.001%	-0.324%	-0.793%	0.037%
66						
67 TAX CALCULATION:						
68 Operating Revenue	2,120,026	145,825	20,651	(10,765,765)	(26,354,093)	1,233,314
69 Other Deductions	-	-	-	-	-	-
70 Interest (AFUDC)	-	-	-	-	-	-
71 Interest	(340)	(23)	(3)	1,728	4,230	(198)
72 Schedule "M" Additions	-	-	-	-	-	-
73 Schedule "M" Deductions	-	-	-	-	-	-
74 Income Before Tax	2,120,366	145,848	20,655	(10,767,493)	(26,358,323)	1,233,512
75						
76 State Income Taxes	96,265	6,622	938	(488,844)	(1,196,668)	56,001
77 Taxable Income	2,024,101	139,227	19,717	(10,278,648)	(25,161,655)	1,177,511
78						
79 Federal Income Taxes + Other	425,061	29,238	4,141	(2,158,516)	(5,283,948)	247,277
APPROXIMATE PRICE CHANGE	(2,215,962)	(150,913)	(21,372)	11,196,298	27,288,701	(1,277,052)



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Miscellaneous General Expense & Revenue**

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	ACCOUNT	Type	TOTAL COMPANY	FACTOR	FACTOR %	OREGON ALLOCATED	REF#
<b>Adjustment to Revenue:</b>							
Gain on Property Sales	421	1	2,241,588	SO	27.125%	608,036	
Gain on Property Sales	421	1	(1,947,042)	SG	26.002%	(506,265)	
Gain on Property Sales	421	1	830	OR	Situs	830	
Gain on Property Sales	421	1	(65,100)	UT	Situs	-	
			<u>230,276</u>			<u>102,600</u>	4.1.1
Commercial and Industrial	442	1	1,766,619	OR	Situs	1,766,619	4.1.2
<b>Adjustment to Expense:</b>							
Other Expenses	557	1	(2,509)	SG	26.002%	(652)	
Administrative & General Salaries	920	1	-	SO	27.125%	-	
Office Supplies and Expenses	921	1	1,284,000	SO	27.125%	348,288	
Customer Records	903	1	-	CN	30.990%	-	
Customer Records	903	1	(14,359)	OR	Situs	(14,359)	
Informational Advertising	909	1	19,017	CA	Situs	-	
Informational Advertising	909	1	(73,991)	CN	30.990%	(22,930)	
Informational Advertising	909	1	1,052	ID	Situs	-	
Informational Advertising	909	1	45,719	OR	Situs	45,719	
Informational Advertising	909	1	11,080	UT	Situs	-	
Informational Advertising	909	1	10,746	WA	Situs	-	
Regulatory Commission Expense	928	1	(2,373)	OR	Situs	(2,373)	
Regulatory Commission Expense	928	1	2,373	SO	27.125%	644	
Duplicate Charges	929	1	317	SO	27.125%	86	
Erroneous Booking Reversal	431	1	3,750	SNP	25.549%	958	
			<u>1,284,821</u>			<u>355,380</u>	4.1.1
Total Adjustments			<u>3,281,716</u>			<u>2,224,600</u>	

**Description of Adjustment:**

This adjustment removes certain miscellaneous expenses that should have been charged below-the-line to non-regulated expenses. It also reallocates certain items such as gains and losses on property sales and regulatory commission expense to reflect the appropriate allocation among the Company's jurisdictions. In addition, it recognizes revenues from the Oregon Customer Opt-Out amortization.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Wages & Employee Benefits

	ACCOUNT	Type	TOTAL COMPANY	FACTOR	FACTOR %	OREGON ALLOCATED	REF#
<b>Adjustment to Expense:</b>							
Steam Operations	500	3	3,790,275	SG	26.002%	985,538	
Fuel Related-Non NPC	501	3	5,365	SE	24.920%	1,337	
Steam Maintenance	512	3	2,948,025	SG	26.002%	766,538	
Hydro Operations	535	3	734,294	SG-P	26.002%	190,929	
Hydro Operations	535	3	500,214	SG-U	26.002%	130,064	
Hydro Maintenance	545	3	152,909	SG-P	26.002%	39,759	
Hydro Maintenance	545	3	33,681	SG-U	26.002%	8,758	
Other Operations	548	3	601,838	SG	26.002%	156,488	
Other Operations	549	3	1,146	OR	Situs	1,146	
Other Maintenance	553	3	194,149	SG	26.002%	50,482	
Other Power Supply Expenses	557	3	1,754,846	SG	26.002%	456,291	
Other Power Supply Expenses	557	3	4,159	ID	Situs	-	
Transmission Operations	560	3	1,289,921	SG	26.002%	335,402	
Transmission Maintenance	571	3	814,199	SG	26.002%	211,706	
Distribution Operations	580	3	1,392,036	SNPD	26.473%	368,508	
Distribution Operations	580	3	1,522,349	OR	Situs	483,809	
Distribution Maintenance	593	3	306,047	SNPD	26.473%	81,019	
Distribution Maintenance	593	3	5,932,559	OR	Situs	2,116,806	
Customer Accounts	903	3	1,627,719	CN	30.990%	504,429	
Customer Accounts	903	3	694,190	OR	Situs	102,574	
Customer Services	908	3	216,368	CN	30.990%	67,052	
Customer Services	908	3	2,003	OTHER	0.000%	-	
Customer Services	908	3	375,939	OR	Situs	127,911	
Administrative & General	920	3	2,888,725	SO	27.125%	783,573	
Administrative & General	920	3	258,825	OR	Situs	72,625	
Administrative & General	935	3	124,099	SO	27.125%	33,662	
Administrative & General	935	3	1,123	OR	Situs	600	
			<u>28,167,004</u>			<u>8,077,008</u>	4.2.2_R

**Description of Adjustment:**

This adjustment recognizes wage and benefit increases that have occurred, or are projected to occur during the twelve month period ending December 2023 for labor charged to operation & maintenance accounts. See page 4.2.1 for more information on how this adjustment was calculated.

*This Reply adjustment incorporates updates to test period wages, annual incentive (AIP), bonus and awards, 401(k), post-retirement welfare (PRW), and other related costs associated with these updates.*

**PacifiCorp  
Oregon General Rate Case - December 2023  
Wage and Employee Benefit Adjustment**

The unadjusted, annualized (12 months ended June 2021), and pro forma period (12 months ending December 2023) labor expenses are summarized on page 4.2.2\_R. The following is an explanation of the procedures used to develop the labor benefits & expenses used in this adjustment.

1. Actual June 2021 total labor related expenses are identified on page 4.2.2\_R, including bare labor, incentive, other labor, pensions, benefits, and payroll taxes.
2. Actual June 2021 expenses for regular time, overtime, and premium pay were identified by labor group and annualized to reflect wage increases during the base period. These annualizations can be found on page 4.2.4\_R.
3. The annualized June 2021 regular time, overtime, and premium pay expenses were then escalated prospectively by labor group to December 2023 (see page 4.2.3\_R). Union and non-union costs were escalated using the contractual and target rates *and dollar increases* found on page 4.2.4\_R and 4.2.5\_R.
4. Compensation related to the Annual Incentive Plan (AIP) is included *on a 5-year historical average, using a ratio of AIP to wages* after removing Named Executive Officers (NEO's) and one-half of remaining AIP per Commission order in general rate case UE-374.  
The Annual Incentive Plan is the second step of a two-stage compensation philosophy that provides certain employees with market average compensation with a portion at risk and based on achieving annual goals. Union employees do not participate in the Company's Annual Incentive Plan; instead, they receive annual increases to their wages that are reflected in the escalation described above. *Bonuses are also included on a 5-year historical average.*
5. Pro Forma December 2023 pension and employee benefit expenses are based on either actuarial projections or are calculated by using actual June 2021 data escalated to December 2023. These expenses can be found on page 4.2.7\_R.
6. Payroll tax calculations can be found on page 4.2.8\_R.

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Wage and Employee Benefit Adjustment**

Account	Description	Actual 12 Months Ended June 2021	Pro Forma 12 Months Ending December 2023	Adjustment	Ref.
5001XX	Regular Ordinary Time	435,272,685	470,037,206	34,764,521	
5002XX	Overtime	78,873,805	85,173,328	6,299,523	
5003XX	Premium Pay	12,492,242	13,489,977	997,735	
	<b>Subtotal for Escalation</b>	<b>526,638,732</b>	<b>568,700,511</b>	<b>42,061,779</b>	4.2.3_R.5_R
5005XX	Unused Leave Accrual	3,238,340	3,496,981	258,641	4.2.6_R
500600	Temporary/Contract Labor	-	-	-	
500700	Severance Pay	2,823,587	324,311	(2,499,276)	
500850	Other Salary/Labor Costs	3,664,315	3,664,315	-	
50109X	Joint Owner Cutbacks	(1,116,081)	(1,205,220)	(89,140)	4.2.6_R
	<b>Subtotal Bare Labor</b>	<b>535,248,894</b>	<b>574,980,899</b>	<b>39,732,005</b>	
500410	Annual Incentive Plan	19,621,442	15,804,152	(3,817,290)	4.2.6_R
	<b>Total Incentive</b>	<b>19,621,442</b>	<b>15,804,152</b>	<b>(3,817,290)</b>	
500250	Overtime Meals	1,547,581	1,547,581	-	
50040x	Bonus and Awards	5,912,567	2,148,196	(3,764,371)	4.2.6_R
501325	Physical Exam	72,102	72,102	-	
502300	Education Assistance	155,719	155,719	-	
580899	Mining Salary/Benefit Credit	(188,725)	(188,725)	-	
	<b>Total Other Labor</b>	<b>7,499,244</b>	<b>3,734,873</b>	<b>(3,764,371)</b>	
	<b>Subtotal Labor and Incentive</b>	<b>562,369,581</b>	<b>594,519,924</b>	<b>32,150,343</b>	
50110X	Pensions	6,136,263	4,818,137	(1,318,127)	4.2.7_R
501115	SERP Plan	-	-	-	4.2.7_R
50115X	Post Retirement Benefits	947,520	1,428,513	480,993	4.2.7_R
501160	Post Employment Benefits	6,401,045	4,691,617	(1,709,428)	4.2.7_R
	<b>Total Pensions</b>	<b>13,484,828</b>	<b>10,938,267</b>	<b>(2,546,561)</b>	4.2.7_R
501102	Pension Administration	2,012,320	897,077	(1,115,243)	4.2.7_R
50112X	Medical	55,789,610	61,261,629	5,472,019	4.2.7_R
50117X	Dental	3,569,680	4,346,190	776,510	4.2.7_R
50120X	Vision	257,722	525,727	268,005	4.2.7_R
50122X	Life	818,089	883,428	65,339	4.2.7_R
50125X	401(k)	39,576,899	45,035,737	5,458,838	4.2.7_R
501251	401(k) Administration	(0)	-	0	4.2.7_R
501275	Accidental Death & Disability	35,043	37,841	2,799	4.2.7_R
501300	Long-Term Disability	3,936,983	4,251,423	314,440	4.2.7_R
5016XX	Worker's Compensation	1,156,797	1,249,189	92,392	4.2.7_R
502900	Other Salary Overhead	611,077	611,077	-	4.2.7_R
	<b>Total Benefits</b>	<b>107,764,220</b>	<b>119,099,319</b>	<b>11,335,099</b>	4.2.7_R
	<b>Subtotal Pensions and Benefits</b>	<b>121,249,048</b>	<b>130,037,586</b>	<b>8,788,538</b>	4.2.7_R
580XXX	Payroll Tax Expense	38,502,103	41,039,969	2,537,866	4.2.8_R
580700	Payroll Tax Expense-Unemployment	3,138,484	3,138,484	-	
	<b>Total Payroll Taxes</b>	<b>41,640,586</b>	<b>44,178,453</b>	<b>2,537,866</b>	
	<b>Total Labor</b>	<b>725,259,215</b>	<b>768,735,962</b>	<b>43,476,747</b>	4.2.11_R
	Non-Utility and Capitalized Labor	255,390,134	270,699,877	15,309,743	4.2.11_R
	<b>Total Utility Labor</b>	<b>469,869,081</b>	<b>498,036,085</b>	<b>28,167,004</b>	4.2.11_R

Ref. 4.2\_R

Labor (12 Months Ended June 2021)

Acct	Account Desc.	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Total
5001XX	Reg/Ordinary Time	38,876	35,124	36,232	36,915	35,229	38,617	34,599	33,011	39,286	36,563	34,667	36,155	435,273
5002XX	Overtime	6,242	6,429	15,102	5,147	4,945	5,939	5,000	7,912	4,792	7,095	4,582	5,690	78,874
5003XX	Premium Pay	1,197	1,093	1,763	936	981	919	746	784	892	1,062	909	1,210	12,492
<b>Grand Total</b>		<b>46,314</b>	<b>42,646</b>	<b>53,096</b>	<b>42,998</b>	<b>41,154</b>	<b>45,474</b>	<b>40,345</b>	<b>41,707</b>	<b>44,971</b>	<b>44,720</b>	<b>40,158</b>	<b>43,054</b>	<b>526,639</b>

Ref. 4.2.2\_R  
Ref. 4.2.2\_R  
Ref. 4.2.2\_R

Labor (12 Months Ended June 2021)

Group Code	Labor Group	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Total
2	Officer/Exempt	17,919	15,412	16,226	17,279	15,197	17,435	15,739	14,376	18,183	16,801	14,865	15,518	194,950
3	IBEW 125	3,485	3,436	4,193	3,315	3,137	3,329	3,216	4,122	3,460	3,463	3,437	3,542	42,135
4	IBEW 659	4,066	3,980	9,088	3,713	3,786	3,848	3,704	5,244	3,713	3,535	3,439	3,808	51,923
5	UWUA 197	180	225	249	196	240	188	247	263	191	174	156	170	2,480
8	UWUA 127	4,303	4,458	4,780	4,209	4,116	4,730	3,919	3,581	4,098	5,040	3,751	4,136	51,122
9	IBEW 57 WY	64	91	100	69	70	57	61	48	58	57	67	60	800
11	IBEW 57 PD	10,258	9,589	12,748	8,667	9,155	9,730	8,186	8,960	9,559	9,670	9,128	10,361	116,011
12	IBEW 57 PS	3,776	3,416	3,542	3,495	3,461	3,878	3,229	3,152	3,443	3,853	3,350	3,421	42,015
13	PCCC Non-Exempt	495	474	531	477	491	572	518	507	530	504	481	473	6,054
15	IBEW 57 CT	352	334	352	324	336	365	323	326	390	372	322	348	4,144
16	IBEW 77	135	131	137	128	129	152	138	130	126	122	126	136	1,590
18	Non-Exempt	1,281	1,101	1,151	1,126	1,036	1,190	1,065	997	1,219	1,130	1,036	1,083	13,414
<b>Grand Total</b>		<b>46,314</b>	<b>42,646</b>	<b>53,096</b>	<b>42,998</b>	<b>41,154</b>	<b>45,474</b>	<b>40,345</b>	<b>41,707</b>	<b>44,971</b>	<b>44,720</b>	<b>40,158</b>	<b>43,054</b>	<b>526,639</b>

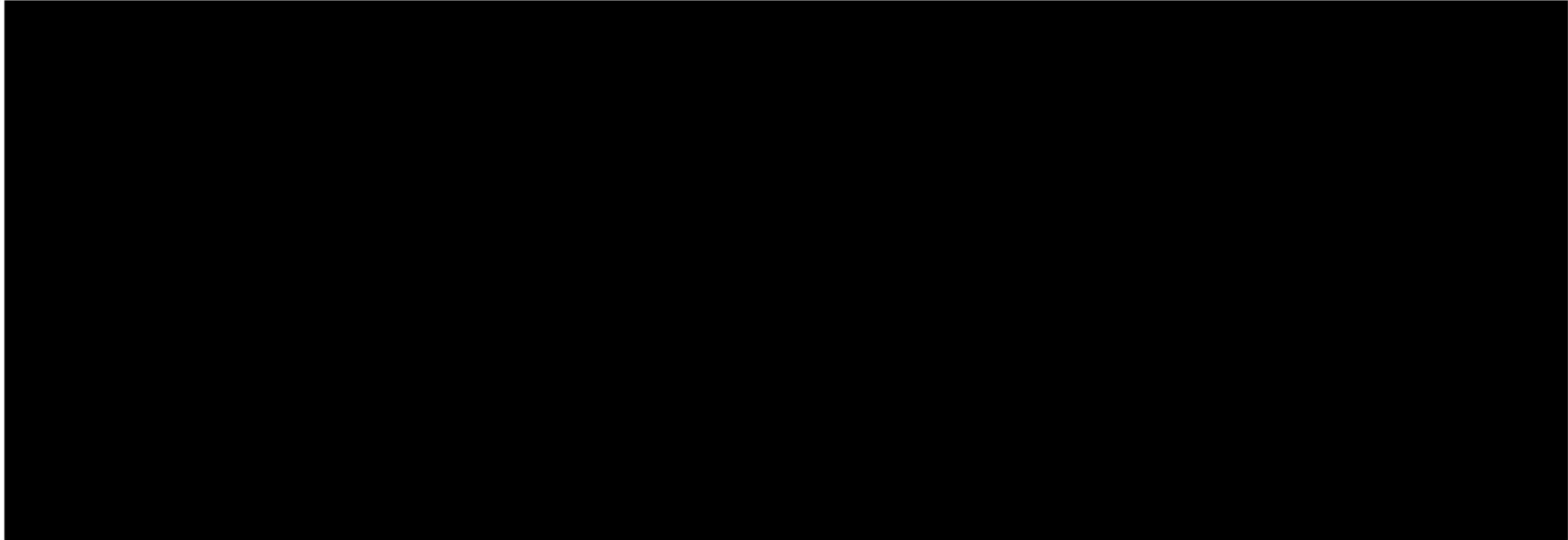
Annualization Increase

Group Code	Labor Group	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	
2	Officer/Exempt							1.49%						(1)
3	IBEW 125								2.50%					(1)
4	IBEW 659											2.50%		(1)
5	UWUA 197												2.50%	(1)
8	UWUA 127				2.00%									(1)
9	IBEW 57 WY	3.10%												(1)
11	IBEW 57 PD								2.50%					(1)
12	IBEW 57 PS								2.50%					(1)
13	PCCC Non-Exempt							1.16%						(1)
15	IBEW 57 CT								2.50%					(1)
16	IBEW 77								0.00%					(5)
18	Non-Exempt							1.48%						(1)

Annualized Labor June 2021

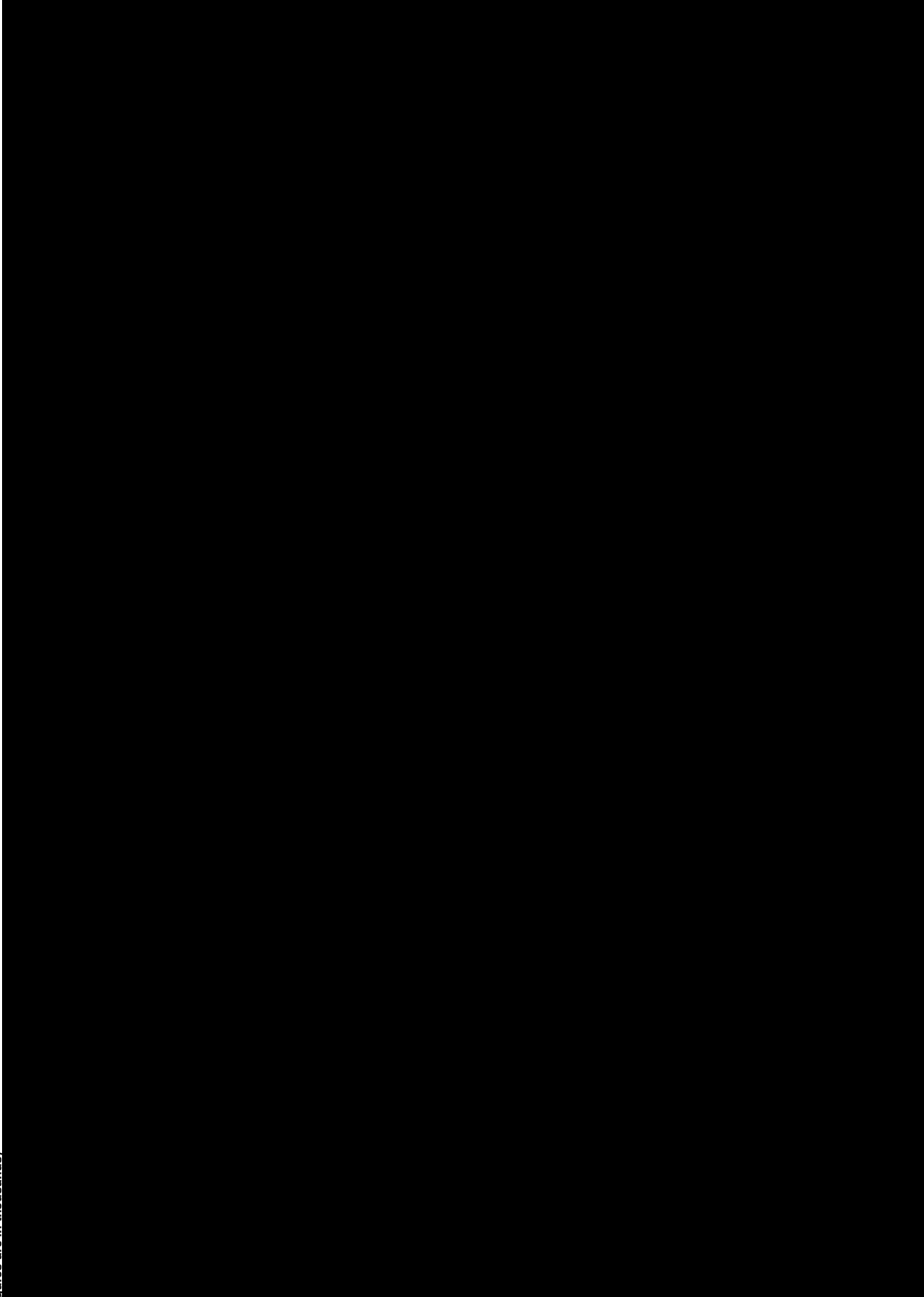
Group Code	Labor Group	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Total
2	Officer/Exempt	18,186	15,641	16,468	17,537	15,424	17,695	15,739	14,376	18,183	16,801	14,865	15,518	196,432
3	IBEW 125	3,572	3,521	4,297	3,398	3,215	3,413	3,296	4,122	3,460	3,463	3,437	3,542	42,738
4	IBEW 659	4,168	4,079	9,315	3,806	3,880	3,944	3,797	5,375	3,806	3,623	3,439	3,808	53,040
5	UWUA 197	184	231	255	201	246	193	254	270	196	178	160	170	2,538
8	UWUA 127	4,389	4,547	4,876	4,209	4,116	4,730	3,919	3,581	4,098	5,040	3,751	4,136	51,393
9	IBEW 57 WY	64	91	100	69	70	57	61	48	58	57	67	60	800
11	IBEW 57 PD	10,515	9,829	13,067	8,884	9,384	9,973	8,390	8,960	9,559	9,670	9,128	10,361	117,719
12	IBEW 57 PS	3,871	3,502	3,630	3,582	3,547	3,975	3,309	3,152	3,443	3,853	3,350	3,421	42,635
13	PCCC Non-Exempt	501	479	537	482	497	579	518	507	530	504	481	473	6,089
15	IBEW 57 CT	361	342	361	332	344	374	331	326	390	372	322	348	4,203
16	IBEW 77	135	131	137	128	129	152	138	130	126	122	126	136	1,590
18	Non-Exempt	1,300	1,117	1,168	1,142	1,052	1,207	1,065	997	1,219	1,130	1,036	1,083	13,516
<b>Grand Total</b>		<b>47,245</b>	<b>43,511</b>	<b>54,211</b>	<b>43,771</b>	<b>41,904</b>	<b>46,292</b>	<b>40,818</b>	<b>41,845</b>	<b>45,069</b>	<b>44,813</b>	<b>40,162</b>	<b>43,054</b>	<b>532,694</b>

Ref. 4.2.2\_R



Base Period: 12 Months Ended June 2021  
Pro Forma: 12 Months Ending December 2023

PacifiCorp  
Oregon General Rate Case - December 2023  
Escalation of Regular, Overtime, and Premium Labor  
(Figures are in thousands)



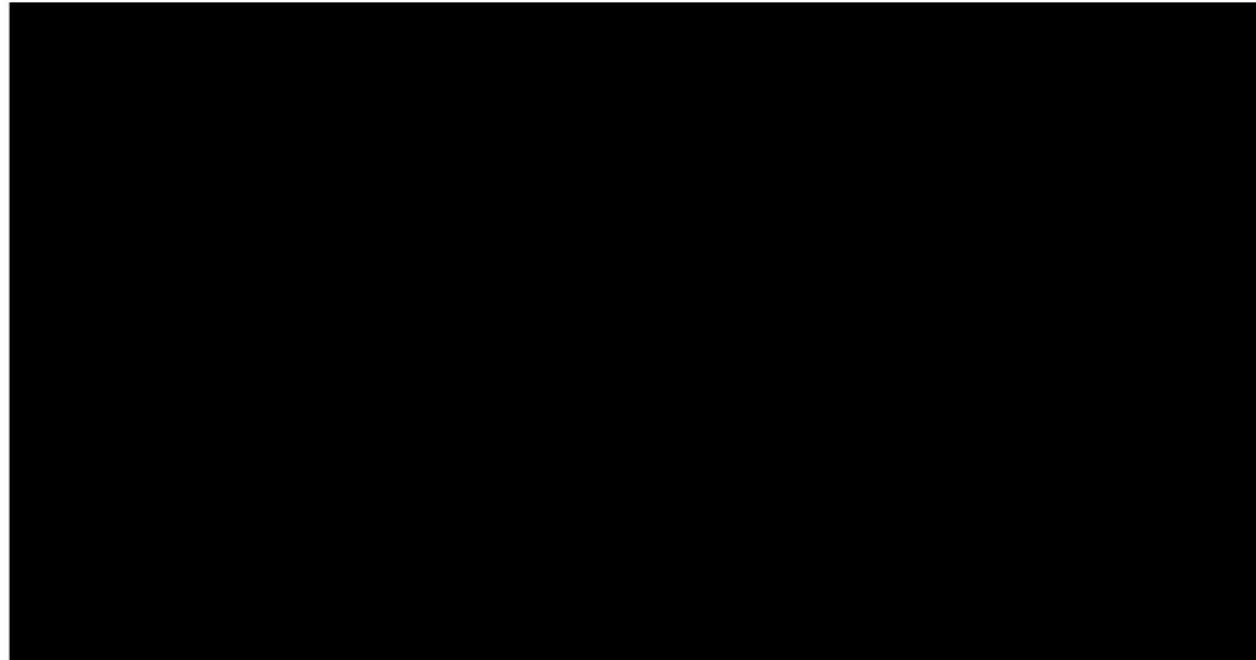
PacifiCorp  
Oregon General Rate Case - December 2023  
Wage and Employee Benefit Adjustment

Composite Labor Increases

Regular Time/Overtime/Premium Pay Annualize - Actual	526,638,732		Ref.
Regular Time/Overtime/Premium Pay December 2023 - Pro Forma	568,700,511	<sup>1</sup> CAGR	4.2.2_R
% Increase	7.99%	3.12%	4.2.2_R

Miscellaneous Bare Labor Escalation

Description	Account	June 2021 Actual	Pro Forma Increase	December 2023 Pro Forma	Pro Forma Adjustment	Ref.
Unused Sick Leave Accrual	5005XX	3,238,340	7.99%	3,496,981	258,641	4.2.2_R
Severance	500700	2,823,587	n/a	324,311	(2,499,276)	4.2.2_R <sup>3</sup>
Joint Owner Cutbacks	50109X	(1,116,081)	7.99%	(1,205,220)	(89,140)	4.2.2_R
		4,945,847		2,616,072	(2,329,775)	



<sup>1</sup>Compound Annual Growth Rate  
<sup>2</sup>Per Commission Order in GRC UE-374, Order No. 20-473  
<sup>3</sup>Removes severance entries associated with the Cholla Unit 4 Closure



Rocky Mountain Power  
Oregon General Rate Case - December 2023  
Wage and Employee Benefit Adjustment

Account	Description	A	B	C	D	D - A	Ref
		Actual June 2021 Net of Joint Venture	Actual June 2021 Gross	Projected December 2023 Gross	Projected December 2023 Net of Joint Venture	Pro Forma Adjustment	
50110X	Pensions	6,136,263	6,240,523	4,900,000	4,818,137	(1,318,127)	4.2.2_R
501115	SERP Plan	0	0	-	-	(0)	4.2.2_R
50115X	Post Retirement Benefits	947,520	985,704	1,486,080	1,428,513	480,993	4.2.2_R
501160	Post Employment Benefits	6,401,045	6,607,102	4,842,646	4,691,617	(1,709,428)	4.2.2_R
	Subtotal	13,484,828	13,833,328	11,228,726	10,938,267	(2,546,561)	4.2.2_R
501102	Pension Administration	2,012,320	2,077,285	926,038	897,077	(1,115,243)	4.2.2_R
50112X	Medical	55,789,610	57,591,269	63,240,000	61,261,629	5,472,019	4.2.2_R
50117X	Dental	3,569,680	3,687,796	4,490,000	4,346,190	776,510	4.2.2_R
50120X	Vision	257,722	264,719	540,000	525,727	268,005	4.2.2_R
50122X	Life	818,089	846,031	913,602	883,428	65,339	4.2.2_R
50125X	401(k)	39,576,899	40,857,477	46,492,945	45,035,737	5,458,838	4.2.2_R
501251	401(k) Administration	(0)	6	-	-	0	4.2.2_R
501275	Accidental Death & Disability	35,043	35,347	38,170	37,841	2,799	4.2.2_R
501300	Long-Term Disability	3,936,983	4,063,380	4,387,916	4,251,423	314,440	4.2.2_R
5016XX	Worker's Compensation	1,156,797	1,192,106	1,287,318	1,249,189	92,392	4.2.2_R
502900	Other Salary Overhead	611,077	612,112	612,112	611,077	-	4.2.2_R
	Subtotal	107,764,220	111,227,527	122,928,099	119,099,319	11,335,099	4.2.2_R
	Grand Total	121,249,048	125,060,855	134,156,825	130,037,586	8,788,538	4.2.2_R
		4.2.2_R			4.2.2_R	4.2.2_R	

**PacifiCorp  
 Oregon General Rate Case - December 2023  
 Wage and Employee Benefit Adjustment**

	<u>Line No.</u>	<u>Ref</u>	<u>Social Security</u>	<u>Medicare</u>	<u>Total FICA Tax</u>	<u>Ref</u>
<b>FICA Calculated on December 2023 Pro Forma Labor</b>						
Pro Forma Wages Adjustment	a		39,473,364	39,473,364		4.2.2_R
Pro Forma Incentive Adjustment	b		(3,817,290)	(3,817,290)		4.2.2_R
	c	a + b	<u>35,656,073</u>	<u>35,656,073</u>		
Percentage of eligible wages	d		<u>91.41%</u>	<u>100.00%</u>		
Total eligible wages	e	c * d	<u>32,594,405</u>	<u>35,656,073</u>		
Tax rate	f		<u>6.20%</u>	<u>1.45%</u>		
Tax on eligible wages	g	e * f	<u>2,020,853</u>	<u>517,013</u>		
<b>Total FICA Tax on Pro Forma Labor</b>		g	<b>2,020,853</b>	<b>517,013</b>	<b>2,537,866</b>	<b>4.2.2_R</b>

PacifiCorp  
Oregon General Rate Case - December 2023  
Wage and Employee Benefit Adjustment

2020P Indicator	Actual		Pro Forma Adjustment	Pro Forma		Oregon Allocation %	Pro Forma		Pro Forma 12 Months Ending December 2023 Oregon Allocated
	12 Months Ended June 2021	% Of Total		12 Months Ending December 2023	Allocation %				
500SG	13,632,623	1.880%	817,228	14,449,851	26.002%	212,494	3,757,216		
502SG	19,155,571	2.641%	1,148,309	20,303,880	26.002%	298,581	5,279,366		
503SE	89,493	0.012%	5,365	94,857	24.920%	1,337	23,639		
505SG	66,888	0.009%	4,010	70,897	26.002%	1,043	18,435		
506SG	30,372,547	4.188%	1,820,728	32,193,275	26.002%	473,421	8,370,818		
510SG	4,534,192	0.625%	271,809	4,806,001	26.002%	70,675	1,249,645		
511SG	8,134,447	1.122%	487,632	8,622,079	26.002%	126,793	2,241,892		
512SG	23,354,332	3.220%	1,400,010	24,754,343	26.002%	364,027	6,436,565		
513SG	10,913,109	1.505%	654,203	11,567,312	26.002%	170,104	3,007,705		
514SG	2,241,529	0.309%	134,372	2,375,901	26.002%	34,939	617,776		
535SG-P	5,273,065	0.727%	316,102	5,589,167	26.002%	82,192	1,453,282		
535SG-U	3,351,104	0.462%	200,887	3,551,991	26.002%	52,234	923,580		
536SG-P	65,898	0.009%	3,950	69,848	26.002%	1,027	18,162		
537SG-P	510,636	0.070%	30,611	541,247	26.002%	7,959	140,734		
537SG-U	28,114	0.004%	1,685	29,799	26.002%	438	7,748		
539SG-P	6,399,565	0.882%	383,631	6,783,196	26.002%	99,751	1,763,750		
539SG-U	4,965,120	0.685%	297,642	5,262,762	26.002%	77,392	1,368,411		
542SG-P	327,201	0.045%	19,615	346,816	26.002%	5,100	90,178		
542SG-U	46,799	0.006%	2,805	49,604	26.002%	729	12,898		
543SG-P	318,638	0.044%	19,101	337,739	26.002%	4,967	87,818		
543SG-U	144,486	0.020%	8,661	153,147	26.002%	2,252	39,821		
544SG-P	944,095	0.130%	56,595	1,000,690	26.002%	14,716	260,197		
544SG-U	173,217	0.024%	10,384	183,601	26.002%	2,700	47,740		
545SG-P	960,823	0.132%	57,598	1,018,421	26.002%	14,976	264,807		
545SG-U	197,353	0.027%	11,831	209,184	26.002%	3,076	54,391		
546SG	5,787	0.001%	347	6,133	26.002%	90	1,595		
548SG	5,657,523	0.780%	339,149	5,996,671	26.002%	88,185	1,559,240		
549OR	19,124	0.003%	1,146	20,271	Situs	1,146.42	20,271		
549SG	4,376,273	0.603%	262,342	4,638,615	26.002%	68,214	1,206,122		
552SG	1,064,019	0.147%	63,784	1,127,803	26.002%	16,585	293,249		
553SG	2,089,352	0.288%	125,249	2,214,602	26.002%	32,567	575,835		
554SG	85,332	0.012%	5,115	90,447	26.002%	1,330	23,518		
556SG	263,837	0.036%	15,816	279,653	26.002%	4,112	72,715		
557ID	69,384	0.010%	4,159	73,543	Situs	-	-		
557SG	29,009,710	4.000%	1,739,030	30,748,740	26.002%	452,179	7,995,214		
560SG	8,483,712	1.170%	508,569	8,992,280	26.002%	132,237	2,338,151		
561SG	10,621,907	1.465%	636,746	11,258,653	26.002%	165,565	2,927,448		
562SG	1,730,531	0.239%	103,739	1,834,270	26.002%	26,974	476,943		
563SG	505,793	0.070%	30,321	536,114	26.002%	7,884	139,399		
566SG	74,754	0.010%	4,481	79,235	26.002%	1,165	20,602		
567SG	101,169	0.014%	6,065	107,234	26.002%	1,577	27,883		
568SG	883,480	0.122%	52,962	936,442	26.002%	13,771	243,491		
569SG	2,754,076	0.380%	165,097	2,919,173	26.002%	42,928	759,037		
570SG	6,311,786	0.870%	378,369	6,690,156	26.002%	98,383	1,739,558		
571SG	3,581,589	0.494%	214,704	3,796,292	26.002%	55,827	987,103		
572SG	51,161	0.007%	3,067	54,228	26.002%	797	14,100		
580CA	(1,637)	0.000%	(98)	(1,735)	Situs	-	-		
580ID	45,109	0.006%	2,704	47,813	Situs	-	-		
580OR	319,311	0.044%	19,142	338,452	Situs	19,141.55	338,452		
580SNPD	7,549,492	1.041%	452,566	8,002,058	26.473%	119,806	2,118,352		
580UT	57,344	0.008%	3,438	60,782	Situs	-	-		
580WA	335,385	0.046%	20,105	355,490	Situs	-	-		
580WYP	86,611	0.012%	5,192	91,803	Situs	-	-		
581SNPD	12,876,362	1.775%	771,893	13,648,255	26.473%	204,340	3,613,048		
582CA	32,613	0.004%	1,955	34,568	Situs	-	-		
582ID	110,031	0.015%	6,596	116,627	Situs	-	-		
582OR	316,930	0.044%	18,999	335,929	Situs	18,998.86	335,929		
582SNPD	979	0.000%	59	1,037	26.473%	16	275		
582UT	757,951	0.105%	45,437	803,388	Situs	-	-		
582WA	99,612	0.014%	5,971	105,583	Situs	-	-		
582WYP	390,342	0.054%	23,400	413,742	Situs	-	-		
583CA	636,751	0.088%	38,171	674,922	Situs	-	-		
583ID	217,551	0.030%	13,041	230,593	Situs	-	-		
583OR	1,323,385	0.182%	79,332	1,402,718	Situs	79,332.30	1,402,718		
583SNPD	163	0.000%	10	173	26.473%	3	46		
583UT	4,466,428	0.616%	267,747	4,734,175	Situs	-	-		
583WA	256,645	0.035%	15,385	272,030	Situs	-	-		
583WYP	255,410	0.035%	15,311	270,721	Situs	-	-		
583WYU	58,617	0.008%	3,514	62,131	Situs	-	-		

Oregon General Rate Case - December 2023  
Wage and Employee Benefit Adjustment

2020P Indicator	Actual		Pro Forma Adjustment	Pro Forma 12 Months Ending December 2023	Oregon Allocation %	Pro Forma Adjustment Oregon Allocated	Pro Forma 12 Months Ending December 2023 Oregon Allocated
	12 Months Ended June 2021	% Of Total					
585SNPD	249,361	0.034%	14,948	264,310	26.473%	3,957	69,970
586CA	82,097	0.011%	4,921	87,018	Situs	-	-
586ID	139,542	0.019%	8,365	147,907	Situs	-	-
586OR	1,027,193	0.142%	61,577	1,088,770	Situs	61,576.65	1,088,770
586UT	405,264	0.056%	24,294	429,558	Situs	-	-
586WA	297,130	0.041%	17,812	314,942	Situs	-	-
586WYP	201,095	0.028%	12,055	213,150	Situs	-	-
586WYU	66,447	0.009%	3,983	70,431	Situs	-	-
587CA	438,562	0.060%	26,290	464,853	Situs	-	-
587ID	681,114	0.094%	40,830	721,944	Situs	-	-
587OR	5,038,483	0.695%	302,039	5,340,522	Situs	302,039.36	5,340,522
587UT	4,431,429	0.611%	265,649	4,697,078	Situs	-	-
587WA	1,065,097	0.147%	63,849	1,128,946	Situs	-	-
587WYP	963,538	0.133%	57,761	1,021,299	Situs	-	-
587WYU	92,288	0.013%	5,532	97,821	Situs	-	-
588CA	(17,937)	-0.002%	(1,075)	(19,013)	Situs	-	-
588ID	(8,402)	-0.001%	(504)	(8,905)	Situs	-	-
588OR	(69,351)	-0.010%	(4,157)	(73,509)	Situs	(4,157.37)	(73,509)
588SNPD	2,544,950	0.351%	152,561	2,697,511	26.473%	40,387	714,101
588UT	247,754	0.034%	14,852	262,606	Situs	-	-
588WA	7,200	0.001%	432	7,632	Situs	-	-
588WYP	(365)	0.000%	(22)	(387)	Situs	-	-
588WYU	(53,280)	-0.007%	(3,194)	(56,474)	Situs	-	-
589CA	20,049	0.003%	1,202	21,251	Situs	-	-
589ID	14,424	0.002%	865	15,289	Situs	-	-
589OR	114,722	0.016%	6,877	121,599	Situs	6,877.17	121,599
589UT	335,267	0.046%	20,098	355,365	Situs	-	-
589WA	10,734	0.001%	643	11,377	Situs	-	-
589WYP	88,779	0.012%	5,322	94,101	Situs	-	-
589WYU	11,861	0.002%	711	12,572	Situs	-	-
590CA	102,277	0.014%	6,131	108,408	Situs	-	-
590ID	218,231	0.030%	13,082	231,313	Situs	-	-
590OR	700,167	0.097%	41,973	742,140	Situs	41,972.55	742,140
590SNPD	2,586,908	0.357%	155,076	2,741,984	26.473%	41,053	725,874
590UT	913,615	0.126%	54,768	968,383	Situs	-	-
590WA	166,440	0.023%	9,977	176,417	Situs	-	-
590WYP	349,882	0.048%	20,974	370,857	Situs	-	-
591SNPD	421	0.000%	25	447	26.473%	7	118
592CA	516,199	0.071%	30,944	547,143	Situs	-	-
592ID	273,616	0.038%	16,402	290,018	Situs	-	-
592OR	2,002,428	0.276%	120,039	2,122,467	Situs	120,038.56	2,122,467
592SNPD	1,335,668	0.184%	80,069	1,415,737	26.473%	21,196	374,782
592UT	1,461,818	0.202%	87,631	1,549,449	Situs	-	-
592WA	413,294	0.057%	24,776	438,069	Situs	-	-
592WYP	583,579	0.080%	34,984	618,563	Situs	-	-
593CA	4,642,317	0.640%	278,291	4,920,607	Situs	-	-
593ID	4,566,290	0.630%	273,733	4,840,023	Situs	-	-
593OR	28,068,609	3.870%	1,682,615	29,751,224	Situs	1,682,614.72	29,751,224
593SNPD	1,847,350	0.255%	110,742	1,958,093	26.473%	29,316	518,358
593UT	27,802,996	3.834%	1,666,692	29,469,688	Situs	-	-
593WA	4,351,067	0.600%	260,831	4,611,898	Situs	-	-
593WYP	6,864,745	0.947%	411,517	7,276,263	Situs	-	-
593WYU	612,106	0.084%	36,694	648,799	Situs	-	-
594CA	318,476	0.044%	19,092	337,568	Situs	-	-
594ID	412,481	0.057%	24,727	437,208	Situs	-	-
594OR	3,901,319	0.538%	233,870	4,135,189	Situs	233,870.38	4,135,189
594SNPD	18,455	0.003%	1,106	19,562	26.473%	293	5,178
594UT	6,585,836	0.908%	394,798	6,980,634	Situs	-	-
594WA	864,643	0.119%	51,832	916,475	Situs	-	-
594WYP	597,900	0.082%	35,842	633,742	Situs	-	-
594WYU	91,719	0.013%	5,498	97,217	Situs	-	-
595SNPD	959,144	0.132%	57,497	1,016,641	26.473%	15,221	269,131
596CA	37,045	0.005%	2,221	39,266	Situs	-	-
596ID	44,578	0.006%	2,672	47,250	Situs	-	-
596OR	442,012	0.061%	26,497	468,509	Situs	26,497.08	468,509
596UT	162,385	0.022%	9,734	172,119	Situs	-	-
596WA	27,712	0.004%	1,661	29,374	Situs	-	-
596WYP	247,587	0.034%	14,842	262,429	Situs	-	-
596WYU	31,037	0.004%	1,861	32,898	Situs	-	-

Oregon General Rate Case - December 2023  
Wage and Employee Benefit Adjustment

2020P Indicator	Actual		Pro Forma Adjustment	Pro Forma 12 Months Ending December 2023	Oregon Allocation %	Pro Forma Adjustment Oregon Allocated	Pro Forma 12 Months Ending December 2023 Oregon Allocated
	12 Months Ended June 2021	% Of Total					
597CA	12,800	0.002%	767	13,568	Situs	-	-
597ID	27,373	0.004%	1,641	29,014	Situs	-	-
597OR	173,588	0.024%	10,406	183,994	Situs	10,405.97	183,994
597SNPD	(70,295)	-0.010%	(4,214)	(74,509)	26.473%	(1,116)	(19,725)
597UT	262,165	0.036%	15,716	277,881	Situs	-	-
597WA	21,109	0.003%	1,265	22,375	Situs	-	-
597WYP	17,829	0.002%	1,069	18,898	Situs	-	-
597WYU	18,826	0.003%	1,129	19,955	Situs	-	-
598CA	5,497	0.001%	330	5,827	Situs	-	-
598OR	23,466	0.003%	1,407	24,873	Situs	1,406.73	24,873
598SNPD	(1,572,321)	-0.217%	(94,255)	(1,666,576)	26.473%	(24,952)	(441,186)
598WA	27,182	0.004%	1,629	28,812	Situs	-	-
901CN	1,689,675	0.233%	101,290	1,790,965	30.990%	31,390	555,019
902CA	314,956	0.043%	18,881	333,837	Situs	-	-
902CN	303,805	0.042%	18,212	322,017	30.990%	5,644	99,793
902ID	1,610,394	0.222%	96,537	1,706,932	Situs	-	-
902OR	1,407,414	0.194%	84,370	1,491,784	Situs	84,369.54	1,491,784
902UT	4,421,298	0.610%	265,041	4,686,340	Situs	-	-
902WA	888,713	0.123%	53,275	941,988	Situs	-	-
902WYP	772,799	0.107%	46,327	819,125	Situs	-	-
902WYU	144,870	0.020%	8,684	153,555	Situs	-	-
903CA	17,721	0.002%	1,062	18,784	Situs	-	-
903CN	25,159,388	3.469%	1,508,217	26,667,605	30.990%	467,395	8,264,272
903ID	220,123	0.030%	13,196	233,319	Situs	-	-
903OR	303,686	0.042%	18,205	321,891	Situs	18,204.92	321,891
903UT	1,076,476	0.148%	64,531	1,141,007	Situs	-	-
903WA	85,485	0.012%	5,125	90,609	Situs	-	-
903WYP	264,505	0.036%	15,856	280,361	Situs	-	-
903WYU	51,717	0.007%	3,100	54,818	Situs	-	-
907CN	2,858	0.000%	171	3,029	30.990%	53	939
908CA	27	0.000%	2	29	Situs	-	-
908CN	1,913,425	0.264%	114,703	2,028,128	30.990%	35,546	628,515
908ID	14,124	0.002%	847	14,971	Situs	-	-
908OR	2,133,756	0.294%	127,911	2,261,667	Situs	127,911.18	2,261,667
908OTHER	33,413	0.005%	2,003	35,416	0.000%	-	-
908UT	2,846,724	0.393%	170,651	3,017,376	Situs	-	-
908WA	319,510	0.044%	19,153	338,663	Situs	-	-
908WYP	957,109	0.132%	57,375	1,014,484	Situs	-	-
909CN	1,693,067	0.233%	101,493	1,794,560	30.990%	31,453	556,133
920OR	907,381	0.125%	54,394	961,775	Situs	54,394.29	961,775
920SO	75,668,430	10.433%	4,536,057	80,204,487	27.125%	1,230,415	21,755,635
920UT	1,534,150	0.212%	91,967	1,626,117	Situs	-	-
920WYP	509,969	0.070%	30,571	540,540	Situs	-	-
921SO	3,300,981	0.455%	197,882	3,498,863	27.125%	53,676	949,074
922SO	(27,772,793)	-3.829%	(1,664,882)	(29,437,674)	27.125%	(451,603)	(7,985,031)
928CA	3,589	0.000%	215	3,804	Situs	-	-
928ID	139,776	0.019%	8,379	148,155	Situs	-	-
928OR	304,110	0.042%	18,230	322,341	Situs	18,230.34	322,341
928SO	383,123	0.053%	22,967	406,090	27.125%	6,230	110,153
928UT	368,546	0.051%	22,093	390,639	Situs	-	-
928WA	88,677	0.012%	5,316	93,992	Situs	-	-
928WYP	461,408	0.064%	27,660	489,067	Situs	-	-
929SO	(3,391,347)	-0.468%	(203,299)	(3,594,646)	27.125%	(55,145)	(975,055)
935CA	5,461	0.001%	327	5,788	Situs	-	-
935OR	10,008	0.001%	600	10,608	Situs	599.95	10,608
935SO	2,070,162	0.285%	124,099	2,194,260	27.125%	33,662	595,198
935WA	3,264	0.000%	196	3,460	Situs	-	-
<b>Utility Labor</b>	<b>469,869,081</b>	<b>64.786%</b>	<b>28,167,004</b>	<b>498,036,085</b>		<b>8,077,008</b>	<b>142,813,958</b>
Capital/Non Utility	255,390,134	35.214%	15,309,743	270,699,877		Ref 4.2_R	
<b>Total Labor</b>	<b>725,259,215</b>	<b>100.00%</b>	<b>43,476,747</b>	<b>768,735,962</b>			
	Ref 4.2.2_R	Ref 4.2.2_R	Ref 4.2.2_R	Ref 4.2.2_R			

**PacifiCorp  
Oregon General Rate Case - December 2023  
Pension Related Non-Service Expense**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Pension Non-Service Expense	926	3	8,253,743	SO	27.125%	2,238,845	4.3.1_R
Post-Retirement Non-Service Exp.	926	3	1,855,684	SO	27.125%	503,358	4.3.1_R
SERP Non-Service Expense	926	3	<u>(2,768,076)</u>	SO	27.125%	<u>(750,846)</u>	4.3.1_R
			7,341,352			1,991,357	
Pension Settle. Loss Amortization Exp.	926	3	1,381,870	SO	27.125%	374,835	4.3.2_R

**Description of Adjustment:**

This adjustment includes the pension and post-retirement non-service expenses at the 2023 forecast level.

These expenses have historically been included in the company's Results of Operations report in the Wage and Employee Benefit Adjustments (WEBA) adjustment no.'s 4.2. Since these expenses are not included in the Company's capitalization calculations they will be accounted for in this new adjustment going forward. All other pension related service expenses will continue to be included in the WEBA adjustment.

This adjustment also adds pension settlement loss amortization expense on losses either incurred or forecasted from the start of the base period through December 2022, with each loss amortized over a 20 year period from occurrence. This approach is consistent with the Company's proposed accounting treatment in deferral application Docket No. UM 2185.

*This Reply adjustment updates the forecasted non-service pension and post-retirement pension expense for 2023 and also the pension settlement loss for 2022 based on new actuarial studies. Please also refer to the Reply testimony of Nikki L. Kobliva.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Pension Related Non-Service Expense

Description	GL 554012	GL 554022	GL 554032	Total Actual	FERC Acct	Factor
	Post-Retirement					
	Pension Non-Service Expense	Non-Service Expense	SERP Non-Service Expense			
	Actual Twelve Months Ended June 2021	Actual Twelve Months Ended June 2021	Actual Twelve Months Ended June 2021			
Jul-2020	(399,614)	(369,812)	231,616	(537,811)	926	SO
Aug-2020	(399,614)	(364,341)	231,616	(532,339)	926	SO
Sep-2020	(399,614)	(364,341)	231,616	(532,339)	926	SO
Oct-2020	(399,614)	(364,341)	231,616	(532,339)	926	SO
Nov-2020	(399,614)	(364,341)	231,616	(532,339)	926	SO
Dec-2020	(399,614)	(364,341)	231,616	(532,339)	926	SO
Jan-2021	(701,505)	(107,969)	229,730	(579,744)	926	SO
Feb-2021	(701,505)	(107,969)	229,730	(579,744)	926	SO
Mar-2021	(701,505)	(107,969)	229,730	(579,744)	926	SO
Apr-2021	(701,505)	(107,969)	229,730	(579,744)	926	SO
May-2021	(701,505)	(107,969)	229,730	(579,744)	926	SO
Jun-2021	(701,505)	(142,103)	229,730	(613,878)	926	SO
Total Actual	<b>(6,606,714)</b>	<b>(2,873,466)</b>	<b>2,768,076</b>	<b>(6,712,105)</b>		

Description	GL 554012	GL 554022	GL 554032	Total Forecast	FERC Acct	Factor
	Post-Retirement					
	Pension Non-Service Expense	Non-Service Expense	SERP Non-Service Expense			
	Actual Twelve Months Ending December 2023	Actual Twelve Months Ending December 2023	Actual Twelve Months Ending December 2023			
Jan-2023	137,252	(84,815)	-	52,437	926	SO
Feb-2023	137,252	(84,815)	-	52,437	926	SO
Mar-2023	137,252	(84,815)	-	52,437	926	SO
Apr-2023	137,252	(84,815)	-	52,437	926	SO
May-2023	137,252	(84,815)	-	52,437	926	SO
Jun-2023	137,252	(84,815)	-	52,437	926	SO
Jul-2023	137,252	(84,815)	-	52,437	926	SO
Aug-2023	137,252	(84,815)	-	52,437	926	SO
Sep-2023	137,252	(84,815)	-	52,437	926	SO
Oct-2023	137,252	(84,815)	-	52,437	926	SO
Nov-2023	137,252	(84,815)	-	52,437	926	SO
Dec-2023	137,252	(84,815)	-	52,437	926	SO
Total Forecasted	<b>1,647,029</b>	<b>(1,017,782)</b>	<b>-</b>	<b>629,247</b>		
Total Incremental Change	<b>8,253,743</b>	<b>1,855,684</b>	<b>(2,768,076)</b>	<b>7,341,352</b>		
	<i>Ref 4.3_R</i>	<i>Ref 4.3_R</i>	<i>Ref 4.3_R</i>	<i>Ref 4.3_R</i>		

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Pension Related Non-Service Expense**  
**Settlement Loss Amortization Expense**

<b>Description</b>	<b>Actual 12 Months Ended June 2021</b>	<b>Current Period Amortization (over 20 Years)</b>	<b>FERC Acct</b>	<b>Factor</b>
Pension Settlement Losses:				
Jul-20	-	-	926	SO
Aug-20	-	-	926	SO
Sep-20	-	-	926	SO
Oct-20	-	-	926	SO
Nov-20	-	-	926	SO
Dec-20	-	-	926	SO
Jan-21	-	-	926	SO
Feb-21	-	-	926	SO
Mar-21	-	-	926	SO
Apr-21	-	-	926	SO
May-21	-	-	926	SO
Jun-21	-	-	926	SO
Total Incurred	-	-		

<b>Description</b>	<b>July 2021 to Dec 2022</b>	<b>Current Period Amortization (over 20 Years):</b>	<b>FERC Acct</b>	<b>Factor</b>
Pension Settlement Losses:				
Jul-21	-	-	926	SO
Aug-21	8,947,043	-	926	SO
Sep-21	-	37,279	926	SO
Oct-21	-	37,279	926	SO
Nov-21	-	37,279	926	SO
Dec-21	6,699,344	37,279	926	SO
Jan-22	-	65,193	926	SO
Feb-22	-	65,193	926	SO
Mar-22	-	65,193	926	SO
Apr-22	-	65,193	926	SO
May-22	-	65,193	926	SO
Jun-22	-	65,193	926	SO
Jul-22	-	65,193	926	SO
Aug-22	-	65,193	926	SO
Sep-22	-	65,193	926	SO
Oct-22	-	65,193	926	SO
Nov-22	-	65,193	926	SO
Dec-22	11,991,010	65,193	926	SO
	27,637,397	931,437		



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Pension Related Non-Service Expense**  
**Settlement Loss Amortization Expense**

<b>Description</b>	<b>Forecasted 12 Months Ended December 2023</b>	<b>Current Period Amortization (over 20 Years):</b>	<b>FERC Acct</b>	<b>Factor</b>
Pension Settlement Losses:				
Jan-23	-	115,156	926	SO
Feb-23	-	115,156	926	SO
Mar-23	-	115,156	926	SO
Apr-23	-	115,156	926	SO
May-23	-	115,156	926	SO
Jun-23	-	115,156	926	SO
Jul-23	-	115,156	926	SO
Aug-23	-	115,156	926	SO
Sep-23	-	115,156	926	SO
Oct-23	-	115,156	926	SO
Nov-23	-	115,156	926	SO
Dec-23	-	115,156	926	SO
Total Incurred	-	<b>1,381,870</b>		
		<b>Ref 4.3_R</b>		

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Remove Non-Recurring Entries**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Remove non-recurring settlement exp.	545	1	(33,000,000)	SG	26.002%	(8,580,581)	4.4.1

This adjustment removes the accrual of environmental costs related to the Klamath Settlement. Environmental remediation spending, once incurred and actual amounts known, are recorded to a regulatory asset and amortized straight-line over a 10-year period since approval in Docket No. UE-147. Expense resulting from amortization of environmental costs spent are included in FERC account 925 for recovery in rates.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Insurance Expense

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	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Remove Base Pd. Inj & Damage	925	1	(139,344,910)	SO	27.125%	(37,797,599)	4.5.1
Remove Base Pd. Inj & Damage	925	1	(1,484,743)	OR	Situs	(1,484,743)	4.5.1
<i>Adj. Inj &amp; Damage to 3-yr avg.</i>	925	3	1,605,846	OR	Situs	1,605,846	4.5.2_R
<u>Adjust property damage expense to 10-year average</u>							
<i>Property Insurance - Transmission</i>	924	3	34,026	OR	Situs	34,026	4.5.3_R
<i>Property Insurance - OR Dist.</i>	924	3	2,355,785	OR	Situs	2,355,785	4.5.3_R
<i>Property Insurance - Non-T&amp;D</i>	924	3	(85,537)	OR	Situs	(85,537)	4.5.3_R
<u>Property Reserve Balance Amortization</u>							
June 2021 Balance Amortization	924	3	2,093,761	OR	Situs	2,093,761	4.5.4
Adjust Liability Insurance Premium	925	3	20,792,083	SO	27.125%	5,639,896	4.5.5
Adjust Property Insurance Premium	924	3	(758,963)	SO	27.125%	(205,870)	4.5.5
<b>Adjustment to Rate Base:</b>							
Remove Injuries & Damages Reserve	2282	3	141,155,665	SO	27.125%	38,288,770	4.5.1
<b>Adjustment to Tax:</b>							
Schedule M - OR Prop Res Amort	SCHMAT	3	10,061,436	OR	Situs	10,061,436	
Def Inc Tax Exp-OR Prop Amort	41110	3	(2,473,765)	OR	Situs	(2,473,765)	
Remove ADIT Inj & Damages Res	190	3	(34,705,378)	SO	27.125%	(9,413,907)	

**Description of Adjustment:**

This adjustment normalizes injuries and damage expense to reflect a three year average of gross expense net of insurance using the cash method. The adjustment also recalculates the historical 10-year average Oregon-allocated property damage amount using the most recent 10-year time period. The June 2021 Oregon property reserve balance is also being amortized over 10 years. The insurance premiums in the base period have been adjusted to those in the Company's most current renewal.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply.*

**PacifiCorp  
Oregon General Rate Case - December 2023  
Insurance Expense  
Provision for Injuries & Damages  
3-Year Average Cash Paid**

	Cash Paid - Injuries & Damages		Third Party Insurance Claim Proceeds			
	Cash Expense	Amount not Seeking Recovery	3 - Year Avg to Recover	Claim Proceeds	Amount not Seeking Recovery	3 - Year Avg to Recovery
12 Months Ended June 2019	3,413,952	51,750		(76,250)	(76,250)	
12 Months Ended June 2020	11,469,351	-		-	-	
12 Months Ended June 2021	2,929,134	-		-	-	
<b>Average Cash</b>	5,937,479	17,250	5,920,229	(25,417)	(25,417)	-
						Below
3 Year Average of Cash Paid for Injuries & Damages Reserve			5,920,229			Above
3 Year Average of Cash Paid for Insurance Recovery			-			Above
3 Year Normalized Average			<u>5,920,229</u>			
Oregon SO Allocation %						27.125%
<b>Oregon Allocated Annual Accrual</b>			<u><u>1,605,846</u></u>			
			<u>Ref 4.5_R</u>			

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Insurance Expense**  
**Provision for Property Damages**  
**10-Year Average**

	<b>Actual Losses</b>			<b>Escalate to 2023</b>		
	System Transmission Losses	Oregon Distribution Losses	System Non-T&D Losses	End CPI-U Index	% Increase	2021
June 2011				225.722		
July 2011 - June 2012	411,470	7,582,565	86,000	229.478	1.66%	127.336%
July 2012 - June 2013	426,385	5,225,455	222,065	233.504	1.75%	125.252%
July 2013 - June 2014	163,517	4,472,174	2,297,475	238.343	2.07%	123.092%
July 2014 - June 2015	489,976	5,264,976	87,189	238.638	0.12%	120.593%
July 2015 - June 2016	440,896	9,217,139	1,272,026	241.018	1.00%	120.444%
July 2016 - June 2017	1,138,848	15,638,087	1,274,291	244.955	1.63%	119.255%
July 2017 - June 2018	1,087,346	2,629,908	39,747	251.989	2.87%	117.338%
July 2018 - June 2019	2,589,430	13,633,167	481,817	256.143	1.65%	114.063%
July 2019 - June 2020	976,712	8,743,858	90,409	257.797	0.65%	112.213%
July 2020 - June 2021	1,519,768	16,305,116	-	271.696	5.39%	111.493%
July 2021 - December 2023				287.426	5.79%	105.789%

	<b>Actual Losses Escalated to CY 2023</b>		
	System Transmission Losses	Oregon Distribution Losses	System Non-T&D Losses
July 2011 - June 2012	523,950	9,655,342	109,509
July 2012 - June 2013	534,055	6,544,983	278,141
July 2013 - June 2014	201,277	5,504,904	2,828,016
July 2014 - June 2015	590,878	6,349,206	105,144
July 2015 - June 2016	531,033	11,101,507	1,532,081
July 2016 - June 2017	1,358,131	18,649,172	1,519,654
July 2017 - June 2018	1,275,871	3,085,884	46,638
July 2018 - June 2019	2,953,575	15,550,365	549,574
July 2019 - June 2020	1,095,997	9,811,739	101,451
July 2020 - June 2021	1,694,435	18,179,061	-
Total in 2023 \$	10,759,202	104,432,164	7,070,208
10 Year Average	1,075,920	10,443,216	707,021
Oregon Allocation Factor	SG	Situs	SG
Oregon Allocation %	26.002%	100%	26.002%
June 2021 - Oregon Allocated 10 Year Average	279,758	10,443,216	183,838
UE - 374 - Oregon Allocated 10 Year Average	245,732	8,087,431	269,375
<b>Adjustment</b>	<b>34,026</b> <b>Ref 4.5_R</b>	<b>2,355,785</b> <b>Ref 4.5_R</b>	<b>(85,537)</b> <b>Ref 4.5_R</b>

**PacifiCorp  
Oregon General Rate Case - December 2023  
Generation Expense Normalization**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Generation Overhaul Expense - Steam	510	1	590,979	SG	26.002%	153,665	4.6.1_R
Generation Overhaul Expense - Other	553	1	3,168,197	SG	26.002%	823,787	4.6.1_R
			<u>3,759,176</u>			<u>977,452</u>	

**Description of Adjustment:**

This adjustment normalizes generation overhaul expenses in the 12 months ended June 2021 using a four-year average methodology. In this adjustment, overhaul expenses from July 2017 - June 2021 are restated in constant dollars to a June 2021 level using industry specific indices and then those constant dollars are averaged. The actual overhaul costs for the 12 months ended June 2021 are subtracted from the four-year average which results in this adjustment.

*This adjustment has been updated to reflect the first quarter 2022 IHS Global Insights Indices and updated allocation factors.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Generation Expense Normalization

**FUNCTION: STEAM**

Period	Overhaul Expense	Less Cholla	Overhaul Expense less Cholla	Restate to Constant Dollars (1)	Constant Dollars
12 Months Ended June 2018	26,282,886	(3,205,000)	23,077,886	10.37%	25,472,168
12 Months Ended June 2019	32,510,459	(52,000)	32,458,459	6.75%	34,649,824
12 Months Ended June 2020	24,450,349	-	24,450,349	4.79%	25,621,442
12 Months Ended June 2021	27,793,172	-	27,793,172	0.00%	27,793,172
4 Year Average - Steam					28,384,151
12 Months Ended June 2021 Overhaul Expense - Steam					27,793,172
<b>Adjustment</b>					<b>590,979</b>

Ref. 4.6\_R  
Ref. 4.6\_R

**FUNCTION: OTHER**

Period	Overhaul Expense	Restate to Constant Dollars (1)	Constant Dollars
12 Months Ended June 2018	5,647,997	8.89%	6,149,865
12 Months Ended June 2019	2,093,159	5.79%	2,214,319
12 Months Ended June 2020	10,103,281	3.72%	10,479,482
12 Months Ended June 2021	2,056,960	0.00%	2,056,960
4 Year Average			5,225,157
12 Months Ended June 2021 Overhaul Expense - Other			2,056,960
<b>Adjustment</b>			<b>3,168,197</b>

Ref. 4.6\_R  
Ref. 4.6\_R

**Total Adjustment**

**3,759,176** Ref. 4.6\_R

(1) Ref. 4.6.3\_R

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Generation Expense Normalization**

<b>Existing Units</b>	12 ME June 2018	12 ME June 2019	12 ME June 2020	12 ME June 2021	
<b>Steam Production</b>					
Blundell	248,814	251,321	42,023	1,664,859	
Dave Johnston	5,262,270	9,567,670	120,060	4,973,811	
Gadsby	70,424	592,107	90,772	1,026,066	
Hunter	8,450,624	6,164,112	9,739,253	242,353	
Huntington	-	8,850,109	12,579,293	20,018	
Jim Bridger	6,745,315	5,927,310	467,066	8,586,277	
Naughton	109,439	828	1,285,882	5,456,306	
Wyodak	-	-	-	-	
Cholla	3,205,000	52,000	-	-	
Colstrip	34,000	-	-	3,629,152	
Craig	819,000	1,105,000	126,000	1,350,355	
Hayden	1,338,000	-	-	843,976	
<b>Subtotal - Steam</b>	<b>26,282,886</b>	<b>32,510,459</b>	<b>24,450,349</b>	<b>27,793,172</b>	<b>Ref 4.6.1_R</b>
<b>Total Steam Production</b>	<b>26,282,886</b>	<b>32,510,459</b>	<b>24,450,349</b>	<b>27,793,172</b>	
<b>Other Production</b>					
Hermiston	1,368,000	2,028,897	3,453,637	1,339,432	
Currant Creek	9,809	5	1,703,462	89,493	
Lake Side	3,834,517	(154,086)	4,849,015	414,565	
Gadsby Peakers	-	29,376	-	-	
Chehalis	435,670	188,968	97,167	213,470	
<b>Total - Other Production</b>	<b>5,647,997</b>	<b>2,093,159</b>	<b>10,103,281</b>	<b>2,056,960</b>	<b>Ref 4.6.1_R</b>
<b>Grand Total</b>	<b>31,930,883</b>	<b>34,603,618</b>	<b>34,553,631</b>	<b>29,850,132</b>	



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Generation Expense Normalization**

<b>STEAM:</b>	<b><u>June 2018</u></b>	<b><u>June 2019</u></b>	<b><u>June 2020</u></b>	<b><u>June 2021</u></b>
Percentage Change to June 2021	<b>10.37%</b>	<b>6.75%</b>	<b>4.79%</b>	<b>0.00%</b>
<b>OTHER:</b>	<b><u>June 2018</u></b>	<b><u>June 2019</u></b>	<b><u>June 2020</u></b>	<b><u>June 2021</u></b>
Percentage Change to June 2021	<b>8.89%</b>	<b>5.79%</b>	<b>3.72%</b>	<b>0.00%</b>

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Revenue Sensitive Items & Uncollectibles**

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	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
<i>Uncollectible Expense</i>	904	3	(289,619)	OR	Situs	(289,619)	4.7.1_R
<i>Other Taxes</i>	408	3	(1,555,006)	OR	Situs	(1,555,006)	4.7.1_R
<i>Reg. Commission Expense</i>	928	3	(275,401)	OR	Situs	(275,401)	4.7.1_R

**Description of Adjustment:**

This adjusts the Company's actual June 2021 uncollectible accounts expense to the December 2023 pro forma period by applying the unadjusted uncollectible rate (unadjusted uncollectible accounts expense/unadjusted general business revenues) to the normalized level of general business revenues. This adjustment also reflects an impact to other tax expense based on the normalized level of general business revenues and a three year historical average of the tax rates, per Commission Order UE-374.

*The Company's rebuttal adjustment has been updated with the change to revenues described in the Reply Testimony of Company witness Mr. Robert M. Meredith, and the OPUC fee rate updated to the most recently approved rate by the Commission on February 24, 2022 in Order No. 22-062.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Revenue Sensitive Items & Uncollectibles**

Unadjusted Revenue	1,308,339,123
Normalized Revenue	1,244,292,468
Adjustments	<u>(64,046,655)</u>
Uncollectible Expense in Base Period	5,916,318
Uncollectible %	0.452%
<b>Uncollectible Expense</b>	<b>(289,619) Ref. 4.7_R</b>
Franchise Tax %	<b>2.303% Ref. 4.7.2_R</b>
Resource Supplier Tax %	<b>0.125% Ref. 4.7.2_R</b>
<b>Other Tax Expense</b>	<b>(1,555,006) Ref. 4.7_R</b>
PUC Fees %	0.430%
<b>PUC Fees Expense</b>	<b>(275,401) Ref. 4.7_R</b>

**PacifiCorp  
Oregon General Rate Case - December 2023  
Revenue Sensitive Items & Uncollectibles**

**Three-Year Average Franchise Tax Rate**

	2021	2020	2019
Sales to Ultimate Consumers	\$ 1,289,111,435	\$ 1,293,711,531	\$ 1,270,397,389
Franchise Tax Expense	\$ 28,789,240	\$ 29,678,090	\$ 30,247,957
Franchise Tax Factor (2019-2021 Avg.- Last 3 Years)	2.303%	2.294%	2.381%
	Ref. 4.7.1_R 1/3(d) + 1/3(e) + 1/3(f)	(e)	(f)
			(c) = (b)/(a)

**Three-Year Average ODOE (Resource Supplier Fees) Rate**

	2021	2020	2019
Gross Operating Revenue Subject to Assessment	\$ 1,307,954,317	\$ 1,328,949,705	\$ 1,285,011,449
Energy Resource Supplier Assessment	\$ 1,692,493	\$ 1,720,165	\$ 1,499,200
Oregon Department of Energy Tax Factor (2019-2021 Avg.- Last 3 Years)	0.125%	0.129%	0.117%
	Ref. 4.7.1_R 1/3(d) + 1/3(e) + 1/3(f)	(e)	(f)
			(c) = (b)/(a)

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Membership & Subscriptions**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Remove Total Memberships and Subscriptions</b>							
	930	1	(1,650,248)	SO	27.125%	(447,633)	
	930	1	<u>(130)</u>	OR	Situs	<u>(130)</u>	
Total			<u>(1,650,378)</u>			<u>(447,763)</u>	4.8.1
<b>Add Back 75% of National &amp; Regional Memberships</b>							
Various	930	1	<u>1,113,129</u>	SO	27.125%	<u>301,939</u>	
Total			<u>1,113,129</u>			<u>301,939</u>	4.8.2

**Description of Adjustment:**

This adjustment removes expenses in excess of Commission policy allowances as stated in the Commission order in UE-94. National and regional trade organizations are recognized at 75%. Western Electricity Coordinating Council and Northern Tier Transmission Group fees are included at 100%. The dues for these two organizations are no longer included in FERC account 930, but are now being booked to FERC account 561, and are not shown in this adjustment.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Meals and Entertainment Adjustment**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Disallowance Removal	500	1	(53)	SG	26.002%	(14)	
	502	1	1	SG	26.002%	0	
	506	1	(1,586)	SG	26.002%	(412)	
	514	1	(22)	SG	26.002%	(6)	
	535	1	(53)	SG-P	26.002%	(14)	
	535	1	(2,222)	SG-U	26.002%	(578)	
	539	1	53	SG	26.002%	14	
	539	1	(0)	SG-U	26.002%	(0)	
	546	1	(12)	SG	26.002%	(3)	
	548	1	(278)	SG	26.002%	(72)	
	549	1	(2,310)	SG	26.002%	(601)	
	553	1	(514)	SG	26.002%	(134)	
	557	1	(13,561)	SG	26.002%	(3,526)	
	560	1	(892)	SG	26.002%	(232)	
	561	1	(142)	SG	26.002%	(37)	
	570	1	(0)	SG	26.002%	(0)	
	571	1	(0)	SG	26.002%	(0)	
	580	1	(2,728)	OR	Situs	(2,728)	
	580	1	(4,679)	SNPD	26.473%	(1,239)	
	581	1	(72)	SNPD	26.473%	(19)	
	585	1	(186)	SNPD	26.473%	(49)	
	588	1	1	OR	Situs	1	
	590	1	(7,290)	SNPD	26.473%	(1,930)	
	592	1	(1,620)	SNPD	26.473%	(429)	
	593	1	0	OR	Situs	0	
	593	1	(8,361)	SNPD	26.473%	(2,213)	
	595	1	(443)	SNPD	26.473%	(117)	
	598	1	(103)	SNPD	26.473%	(27)	
	901	1	(669)	CN	30.990%	(207)	
	903	1	(172)	CN	30.990%	(53)	
	908	1	(542)	CN	30.990%	(168)	
	908	1	(3,058)	OR	Situs	(3,058)	
	909	1	(578)	CN	30.990%	(179)	
	921	1	(9,661)	SO	27.125%	(2,621)	
			<u>(61,751)</u>			<u>(20,651)</u>	4.9.1

**Description of Adjustment:**

This adjustment removes the disallowance that was ordered by the Commission in Order UE 374 No. 20-473. The Commission ruled that all meals and entertainment expenses recognized as discretionary costs and all awards expense would be disallowed at 50%.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
O&M Expense Escalation

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Steam Operations	500	3	20,816	SG	26.002%	5,413	
Steam Operations	500	3	96,836	SG	26.002%	25,179	
Steam Operations	501	3	1,496,097	SE	24.920%	372,830	
Steam Operations	501	3	23,618	SE	24.920%	5,886	
Steam Operations	501	3	554,245	OR	Situs	439,442	
Steam Operations	502	3	5,031,501	SG	26.002%	1,308,279	
Steam Operations	502	3	412,316	SG	26.002%	107,209	
Steam Operations	503	3	(7,991)	SE	24.920%	(1,991)	
Steam Operations	505	3	-	SG	26.002%	-	
Steam Operations	505	3	87,041	SG	26.002%	22,632	
Steam Operations	505	3	11,712	SG	26.002%	3,045	
Steam Operations	506	3	(4,467,200)	SG	26.002%	(1,161,551)	
Steam Operations	506	3	2,411,314	SG	26.002%	626,984	
Steam Operations	506	3	129,354	SG	26.002%	33,634	
Steam Operations	507	3	-	SG	26.002%	-	
Steam Operations	507	3	41,669	SG	26.002%	10,835	
Steam Operations	507	3	21	SG	26.002%	6	
Steam Maintenance	510	3	77,412	SG	26.002%	20,128	
Steam Maintenance	510	3	190,704	SG	26.002%	49,586	
Steam Maintenance	510	3	139,403	SG	26.002%	36,247	
Steam Maintenance	511	3	1,817,803	SG	26.002%	472,661	
Steam Maintenance	511	3	333,904	SG	26.002%	86,821	
Steam Maintenance	512	3	-	SG	26.002%	-	
Steam Maintenance	512	3	5,837,381	SG	26.002%	1,517,822	
Steam Maintenance	512	3	228,432	SG	26.002%	59,396	
Steam Maintenance	513	3	-	SG	26.002%	-	
Steam Maintenance	513	3	2,643,389	SG	26.002%	687,328	
Steam Maintenance	513	3	39,402	SG	26.002%	10,245	
Steam Maintenance	514	3	1,092,222	SG	26.002%	283,997	
Steam Maintenance	514	3	191,550	SG	26.002%	49,806	
Hydro Operations	535	3	435,041	SG	26.002%	113,118	
Hydro Operations	535	3	(178,188)	SG	26.002%	(46,332)	
Hydro Operations	536	3	23,733	SG	26.002%	6,171	
Hydro Operations	536	3	-	SG	26.002%	-	
Hydro Operations	537	3	378,816	SG	26.002%	98,499	
Hydro Operations	537	3	30,078	SG	26.002%	7,821	
Hydro Operations	539	3	558,705	SG	26.002%	145,273	
Hydro Operations	539	3	164,005	SG	26.002%	42,644	
Hydro Operations	539	3	6	SG	26.002%	1	
Hydro Operations	540	3	148,538	SG	26.002%	38,622	
Hydro Operations	540	3	6,631	SG	26.002%	1,724	
			<u>20,000,316</u>			<u>5,479,412</u>	

**Description of Adjustment:**

This adjustment calculates the non-labor O&M escalation from June 2021 to December 2023 for accounts 500 to 935 , excluding NPC and property and liability insurance, using industry specific escalation indices. Before escalation indices were applied, June 2021 actual data was separated into labor and non-labor components and costs that should not be included in June 2021 actual data were removed. Detail supporting specific FERC accounts is provided in the electronic work papers along with the Company's filing.

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PacifiCorp  
Oregon General Rate Case - December 2023  
(cont.) O&M Expense Escalation

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Hydro Maintenance	541	3	55	SG	26.002%	14	
Hydro Maintenance	541	3	-	SG	26.002%	-	
Hydro Maintenance	542	3	59,866	SG	26.002%	15,566	
Hydro Maintenance	542	3	3,770	SG	26.002%	980	
Hydro Maintenance	543	3	54,094	SG	26.002%	14,065	
Hydro Maintenance	543	3	30,353	SG	26.002%	7,892	
Hydro Maintenance	544	3	98,616	SG	26.002%	25,642	
Hydro Maintenance	544	3	11,181	SG	26.002%	2,907	
Hydro Maintenance	545	3	294,943	SG	26.002%	76,690	
Hydro Maintenance	545	3	92,219	SG	26.002%	23,979	
Hydro Maintenance	545	3	-	SG	26.002%	-	
Other Operations	546	3	29,301	SG	26.002%	7,619	
Other Operations	546	3	(1)	SG	26.002%	(0)	
Other Operations	547	3	-	SE	24.920%	-	
Other Operations	548	3	(26)	SG	26.002%	(7)	
Other Operations	547	3	-	SE	24.920%	-	
Other Operations	548	3	1,127,320	SG	26.002%	293,123	
Other Operations	548	3	25,390	SG	26.002%	6,602	
Other Operations	549	3	1,235	OR	Situs	1,235	
Other Operations	549	3	(2,864)	SG	26.002%	(745)	
Other Operations	549	3	(1,282)	SG	26.002%	(333)	
Other Operations	549	3	387,772	SG	26.002%	100,828	
Other Operations	550	3	35,181	OR	Situs	35,181	
Other Operations	550	3	-	SG	26.002%	-	
Other Operations	550	3	3,799	SG	26.002%	988	
Other Operations	550	3	691,463	SG	26.002%	179,792	
Other Operations	550	3	-	SG	26.002%	-	
Other Maintenance	552	3	-	SG	26.002%	-	
Other Maintenance	552	3	175,844	SG	26.002%	45,722	
Other Maintenance	552	3	2,288	SG	26.002%	595	
Other Maintenance	553	3	283,909	SG	26.002%	73,821	
Other Maintenance	553	3	1,463,540	SG	26.002%	380,546	
Other Maintenance	553	3	322,184	SG	26.002%	83,774	
Other Maintenance	553	3	20,183	SG	26.002%	5,248	
Other Maintenance	554	3	-	SG	26.002%	-	
Other Maintenance	554	3	138,042	SG	26.002%	35,893	
Other Maintenance	554	3	277,849	SG	26.002%	72,246	
Other Maintenance	554	3	5,025	SG	26.002%	1,307	
			<u>5,631,251</u>			<u>1,491,172</u>	

**Description of Adjustment:**

This adjustment calculates the non-labor O&M escalation from June 2021 to December 2023 for accounts 500 to 935 , excluding NPC and property and liability insurance, using industry specific escalation indices. Before escalation indices were applied, June 2021 actual data was separated into labor and non-labor components and costs that should not be included in June 2021 actual data were removed. Detail supporting specific FERC accounts is provided in the electronic work papers along with the Company's filing.

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PacifiCorp  
Oregon General Rate Case - December 2023  
(cont.) O&M Expense Escalation

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	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Other Operations	556	3	30,954	SG	26.002%	8,049	
Other Operations	557	3	634,276	OR	Situs	284,175	
Other Operations	557	3	555,813	SG	26.002%	144,521	
Other Operations	557	3	797	SE	24.920%	199	
Other Operations	557	3	-	SG	26.002%	-	
Transmission Operations	560	3	35,532	SG	26.002%	9,239	
Transmission Operations	560	3	(63)	SG	26.002%	(16)	
Transmission Operations	561	3	507,060	SG	26.002%	131,844	
Transmission Operations	561	3	(10)	SG	26.002%	(3)	
Transmission Operations	562	3	106,292	SG	26.002%	27,638	
Transmission Operations	563	3	32,285	SG	26.002%	8,395	
Transmission Operations	566	3	250,515	SG	26.002%	65,138	
Transmission Operations	567	3	168,732	SG	26.002%	43,873	
Transmission Maintenance	568	3	(6,310)	SG	26.002%	(1,641)	
Transmission Maintenance	569	3	408,161	SG	26.002%	106,129	
Transmission Maintenance	570	3	658,690	SG	26.002%	171,271	
Transmission Maintenance	571	3	2,312,042	SG	26.002%	601,172	
Transmission Maintenance	571	3	(356,956)	SG	26.002%	(92,815)	
Transmission Maintenance	572	3	19,507	SG	26.002%	5,072	
Transmission Maintenance	573	3	29,075	SG	26.002%	7,560	
Distribution Operations	580	3	80,705	OR	Situs	10,307	
Distribution Operations	580	3	53,902	SNPD	26.473%	14,269	
Distribution Operations	581	3	-	OR	Situs	-	
Distribution Operations	581	3	(15,294)	SNPD	26.473%	(4,049)	
Distribution Operations	582	3	240,103	OR	Situs	74,810	
Distribution Operations	582	3	1,539	SNPD	26.473%	407	
Distribution Operations	583	3	203,879	OR	Situs	43,410	
Distribution Operations	583	3	0	SNPD	26.473%	0	
Distribution Operations	584	3	40	OR	Situs	40	
Distribution Operations	584	3	-	SNPD	26.473%	-	
Distribution Operations	585	3	7,049	SNPD	26.473%	1,866	
Distribution Operations	586	3	50,513	OR	Situs	23,333	
Distribution Operations	586	3	-	SNPD	26.473%	-	
Distribution Operations	587	3	365,094	OR	Situs	124,610	
Distribution Operations	587	3	-	SNPD	26.473%	-	
Distribution Operations	588	3	29,394	OR	Situs	(4,350)	
Distribution Operations	588	3	(178,809)	SNPD	26.473%	(47,335)	
Distribution Operations	589	3	278,422	OR	Situs	166,932	
Distribution Operations	589	3	2,406	SNPD	26.473%	637	
			<u>6,505,335</u>			<u>1,924,688</u>	

**Description of Adjustment:**

This adjustment calculates the non-labor O&M escalation from June 2021 to December 2023 for accounts 500 to 935 , excluding NPC and property and liability insurance, using industry specific escalation indices. Before escalation indices were applied, June 2021 actual data was separated into labor and non-labor components and costs that should not be included in June 2021 actual data were removed. Detail supporting specific FERC accounts is provided in the electronic work papers along with the Company's filing.

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PacifiCorp  
Oregon General Rate Case - December 2023  
(cont.) O&M Expense Escalation

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Distribution Maintenance	590	3	58,221	OR	Situs	20,432	
Distribution Maintenance	590	3	(5,604)	SNPD	26.473%	(1,484)	
Distribution Maintenance	591	3	294,478	OR	Situs	83,908	
Distribution Maintenance	591	3	9,940	SNPD	26.473%	2,631	
Distribution Maintenance	592	3	326,814	OR	Situs	120,768	
Distribution Maintenance	592	3	38,232	SNPD	26.473%	10,121	
Distribution Maintenance	593	3	(1,548,858)	OR	Situs	(2,629,945)	
Distribution Maintenance	593	3	(159,682)	SNPD	26.473%	(42,272)	
Distribution Maintenance	594	3	2,719,384	OR	Situs	537,612	
Distribution Maintenance	594	3	805	SNPD	26.473%	213	
Distribution Maintenance	595	3	-	OR	Situs	-	
Distribution Maintenance	595	3	23,732	SNPD	26.473%	6,282	
Distribution Maintenance	596	3	146,886	OR	Situs	41,465	
Distribution Maintenance	597	3	26,441	OR	Situs	6,848	
Distribution Maintenance	597	3	16,240	SNPD	26.473%	4,299	
Distribution Maintenance	598	3	230,400	OR	Situs	(45,808)	
Distribution Maintenance	598	3	1,027,163	SNPD	26.473%	271,917	
Customer Accounts Operations	901	3	69	OR	Situs	-	
Customer Accounts Operations	901	3	63,171	CN	30.990%	19,577	
Customer Accounts Operations	902	3	370,554	OR	Situs	100,859	
Customer Accounts Operations	902	3	9,454	CN	30.990%	2,930	
Customer Accounts Operations	903	3	148,918	OR	Situs	49,937	
Customer Accounts Operations	903	3	1,569,299	CN	30.990%	486,325	
Customer Accounts Operations	904	3	1,325,767	OR	Situs	659,878	
Customer Accounts Operations	904	3	15,760	CN	30.990%	4,884	
Customer Accounts Operations	905	3	-	OR	Situs	-	
Customer Accounts Operations	905	3	2,843	CN	30.990%	881	
Customer Service Operations	907	3	6	CN	30.990%	2	
Customer Service Operations	908	3	35,282	OR	Situs	10,991	
Customer Service Operations	908	3	12,233	CN	30.990%	3,791	
Customer Service Operations	908	3	11,792,952	OTHER	0.000%	-	
Customer Service Operations	909	3	237,201	OR	Situs	84,281	
Customer Service Operations	909	3	98,242	CN	30.990%	30,445	
Customer Service Operations	910	3	-	OR	Situs	-	
Customer Service Operations	910	3	205	CN	30.990%	64	
			<u>18,886,549</u>			<u>(158,169)</u>	

**Description of Adjustment:**

This adjustment calculates the non-labor O&M escalation from June 2021 to December 2023 for accounts 500 to 935, excluding NPC and property and liability insurance, using industry specific escalation indices. Before escalation indices were applied, June 2021 actual data was separated into labor and non-labor components and costs that should not be included in June 2021 actual data were removed. Detail supporting specific FERC accounts is provided in the electronic work papers along with the Company's filing.

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PacifiCorp  
Oregon General Rate Case - December 2023  
(cont.) O&M Expense Escalation

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
A&G Operations	920	3	(49,480)	OR	Situs	(15,212)	
A&G Operations	920	3	59,383	SO	27.125%	16,108	
A&G Operations	921	3	7,605	CN	30.990%	2,357	
A&G Operations	921	3	204,012	OR	Situs	157,500	
A&G Operations	921	3	539,515	SO	27.125%	146,344	
A&G Operations	922	3	(718,624)	SO	27.125%	(194,928)	
A&G Operations	923	3	78,786	OR	Situs	17,319	
A&G Operations	923	3	1,712,578	SO	27.125%	464,540	
A&G Operations	924	3	-	SO	27.125%	-	
A&G Operations	925	3	-	SO	27.125%	-	
A&G Operations	926	3	(248,352)	SO	27.125%	(67,366)	
A&G Operations	926	3	375,643	OR	Situs	10,874	
A&G Operations	928	3	466,704	SG	26.002%	121,351	
A&G Operations	928	3	-	SO	27.125%	-	
A&G Operations	928	3	202,237	SO	27.125%	54,857	
A&G Operations	928	3	1,824,586	OR	Situs	597,542	
A&G Operations	929	3	(36,982)	SO	27.125%	(10,031)	
A&G Operations	930	3	1,325	OR	Situs	-	
A&G Operations	930	3	-	CN	30.990%	-	
A&G Operations	930	3	-	SG	26.002%	-	
A&G Operations	930	3	106,940	SO	27.125%	29,008	
A&G Operations	931	3	100,548	OR	Situs	44,315	
A&G Operations	931	3	200,775	SO	27.125%	54,461	
A&G Operations	935	3	33,634	OR	Situs	12,554	
A&G Operations	935	3	2,489	CN	30.990%	771	
A&G Operations	935	3	2,161,448	SO	27.125%	586,297	
			<u>7,024,770</u>			<u>2,028,662</u>	
			20,000,316			5,479,412	4.10_R
			5,631,251			1,491,172	4.10.1_R
			6,505,335			1,924,688	4.10.2_R
			18,886,549			(158,169)	4.10.3_R
			<u>7,024,770</u>			<u>2,028,662</u>	4.10.4_R
<b>Total Adjustment</b>			<u>58,048,221</u>			<u>10,765,765</u>	4.10.6_R

**Description of Adjustment:**

This adjustment calculates the non-labor O&M escalation from June 2021 to December 2023 for accounts 500 to 935, excluding NPC and property and liability insurance, using industry specific escalation indices. Before escalation indices were applied, June 2021 actual data was separated into labor and non-labor components and costs that should not be included in June 2021 actual data were removed. Detail supporting specific FERC accounts is provided in the electronic work papers along with the Company's filing.

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PacificCorp  
Oregon General Rate Case - December 2023  
O&M Expense Escalation

Function	Allocation Code	4.1 Miscellaneous O&M	4.2 Remove Unallocated Transfers	4.4 Remove Entries	4.5 R Insurance Expense	4.6 R Generation Expense	4.8 Membership & Subscriptions	4.9 Meals and Entertainment Adjustment	4.11 Wildfire & Veg Expense	5.1 R Net Power Costs	6.9 Remove Rolling Hills	8.10 Deer Creek Mine Closure	8.12 R Creek Unit Retirement	R 2 Clean Fuels Revenue	R 8 Advertising Expense	O&M Escalation	Percent Escalation	O&M Expense Escalation	4.10 R Escalation	O&M Escalation
<b>Distribution Maintenance</b>																				
CA		10,043,845														-4,608,933	16.77%	739,328	5,148,281	
ID		5,689,727														-127,159	16.77%	(1,864,727)	148,862	
OR		66,832,280						0	(42,640,829)							(11,220,139)	16.77%	(1,864,727)	(12,984,860)	
UT		15,189,312						(17,817)	(1,548,887)							16,800,898	16.77%	2,718,319	18,804,016	
WV		8,487,156														2,615,208	16.77%	438,625	3,054,333	
WVP		9,463,181														801,657	16.77%	134,429	536,086	
		1,446,826														60,657	16.77%	10,287	70,944	
		2,559,733														18,110,320	16.77%	3,204,882	23,314,952	
		167,385,477														18,110,320	16.77%	3,204,882	23,314,952	
<b>Customer Accounts Operations</b>																				
CA		670,321														-337,643	11.15%	37,689	375,303	
CN		42,841,820						(840)								-14,887,913	11.15%	1,660,528	16,548,441	
ID		2,980,413														1,149,895	11.15%	128,254	1,278,149	
OR		8,893,775														7,268,318	11.15%	810,674	8,078,990	
UT		3,171,306														2,197,108	11.15%	244,095	2,442,163	
WV		1,546,826														508,423	11.15%	56,718	565,241	
WVP		2,559,733														63,180	11.15%	7,047	70,227	
		70,160,759						(840)								31,422,374	11.15%	3,593,635	34,936,349	
<b>Customer Service Operations</b>																				
CA		19,917														969,640	11.62%	17,262	1,000,609	
ID		4,207,292						(1,119)							(70,018)	929,640	11.62%	11,262	1,000,609	
OR		1,255,838														112,766	11.62%	13,100	125,866	
UT		4,151,715						(3,058)						(1,240,507)		820,719	11.62%	95,272	915,991	
WV		10,753,822														107,379,528	11.62%	11,368,824	119,368,352	
WVP		4,539,332														150,568	11.62%	17,491	168,059	
		1,291,527														334,418	11.62%	38,849	373,267	
		116,629,403						(4,178)						(1,240,507)		104,814,321	11.62%	12,176,121	116,990,442	
<b>ASG Operations &amp; Maintenance</b>																				
CA		79,743,241														133,311	7.43%	8,893	143,374	
CN		10,683,468						(9,861)								6,638,916	6.70%	751,132	8,387,549	
ID		(37,448,530)														(9,673,739)	7.43%	(718,624)	(10,392,362)	
OR		23,768,045														23,768,045	7.54%	1,791,384	25,559,409	
UT		153,865,341														12,255,688	0.00%	-	12,255,688	
WV		(1,947,501)														1,919,513	6.63%	127,291	2,046,803	
WVP		24,689,376														22,800,447	10.88%	2,493,827	25,473,674	
		2,288,077														1,730,829	6.26%	108,285	1,839,113	
		3,092,716						(637,249)								3,092,716	9.74%	301,323	3,394,039	
		26,238,967														24,459,098	9.99%	2,797,572	28,667,659	
		1,284,317						(9,861)								10,638,916	8.99%	55,048,221	66,707,137	
		1,281,071						(81,751)								10,638,916	8.99%	55,048,221	66,707,137	
		3,032,184,237						(81,751)	(46,381,323)	(33,207,191)	(1,372,534)	(82,412,400)	(14,448,254)	(1,240,507)	(70,018)	2,323,394,070	9.99%	55,048,221	2,391,442,292	
		3,032,184,237						(81,751)	(46,381,323)	(33,207,191)	(1,372,534)	(82,412,400)	(14,448,254)	(1,240,507)	(70,018)	2,323,394,070	9.99%	55,048,221	2,391,442,292	

Ref 4.10.4 R

**PacifiCorp  
Oregon General Rate Case - December 2023  
Escalation Factors**

Page 4.10.7\_R

	<b>Escalation Factors June 2021 to December 2023</b>	<b>FERC Accounts</b>
<b>STEAM PRODUCTION PLANT</b>		
Operation:	8.93%	500 - 507
Maintenance:	13.10%	510 - 514
<b>HYDRO PRODUCTION PLANT</b>		
Operation:	10.39%	535 - 540
Maintenance:	14.42%	541 - 545
<b>OTHER PRODUCTION PLANT</b>		
Operation:	9.31%	546 - 550; 556 - 557
Maintenance:	13.82%	551 - 554
<b>TRANSMISSION PLANT</b>		
Operation:	7.09%	560 - 567
Maintenance:	16.42%	568 - 573
<b>DISTRIBUTION PLANT</b>		
Operation:	9.50%	580 - 589
Maintenance:	16.77%	590 - 598
<b>CUSTOMER ACCOUNTS</b>		
Operation:	11.15%	901 - 905
<b>CUSTOMER SERVICE and INFORMATION</b>		
Operation:	11.62%	907 - 910
<b>SALES</b>		
Operation:	12.19%	911 - 916
<b>ADMINISTRATIVE and GENERAL</b>		
Operation:	7.43%	920, 922, 929
Operation:	8.70%	921
Operation:	7.54%	923
Operation:	6.63%	926
Operation:	9.85%	927
Operation:	10.88%	928
Operation:	6.26%	930
Operation:	9.74%	931
Maintenance:	8.99%	935

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Wildfire & Veg Management Expenses**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
<u>Remove Base Period Expenses</u>							
System	593	1	(1,546,887)	SNPD	26.473%	(409,501)	4.11.1
Distribution	593	1	(42,640,829)	OR	Situs	(42,640,829)	4.11.1
Transmission	571	1	(2,174,016)	SG	26.002%	(565,282)	4.11.1
			<u>(46,361,732)</u>			<u>(43,615,612)</u>	
<u>Add Test Period Expenses</u>							
System	593	3	2,475,000	SNPD	26.473%	655,197	4.11.1
Distribution	593	3	68,453,082	OR	Situs	68,453,082	4.11.1
Transmission	571	3	3,312,955	SG	26.002%	861,427	4.11.1
			<u>74,241,037</u>			<u>69,969,706</u>	

**Description of Adjustment:**

This adjustments resets Vegetation and Wildfire Management expenses from levels included in the base period data to expected levels into the test period 12 months ending Dec 2023.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Utah Schedule 34 Transmission Reallocation

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Transmission of Electricity by Others	566	3	(4,743,194)	SG	26.002%	(1,233,314)	

**Description of Adjustment:**

The Company executed a renewable resource contract in Utah (Docket 16-035-27) dedicated to serve load associated with Facebook. As a result of the increased load from this dedicated resource to serve Facebook, PacifiCorp will be allocated a higher ratio of wholesale transmission costs relative to other wholesale users of the Company's transmission system. This adjustment reallocates the resulting wheeling expense from other jurisdictions which would have otherwise been situs assigned to Utah.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*



## Tab 5 - Net Power Cost

**PacifiCorp**  
**Oregon General Rate Case – December 2023**  
**Net Power Cost Adjustment Index**

The following adjustments were used to develop pro forma net power costs for the test period. The Company's booked power costs for the 12 months ended June 2021 provide the starting point for establishing the adjustment amounts for the December 2023 test period.

- 5.1\_R Net Power Costs
- 5.2\_R BOSR & WRAP Fees – Revised for allocation factor impact only

**Pacifcorp**  
**Oregon General Rate Case - December 2023**  
**Tab 5 Adjustment Summary**

	5.1_R	5.2_R	
	Total Adjustments	Net Power Costs	BOSR & WRAP Fees
1 Operating Revenues:			
2 General Business Revenues	-	-	-
3 Interdepartmental	-	-	-
4 Special Sales	50,585,595	50,585,595	-
5 Other Operating Revenues	-	-	-
6 Total Operating Revenues	<u>50,585,595</u>	<u>50,585,595</u>	-
7			
8 Operating Expenses:			
9 Steam Production	(1,460,911)	(1,460,911)	-
10 Nuclear Production	-	-	-
11 Hydro Production	-	-	-
12 Other Power Supply	99,362,079	99,078,659	283,419
13 Transmission	1,646,555	1,646,555	-
14 Distribution	-	-	-
15 Customer Accounting	-	-	-
16 Customer Service & Info	-	-	-
17 Sales	-	-	-
18 Administrative & General	-	-	-
19			
20 Total O&M Expenses	<u>99,547,723</u>	<u>99,264,304</u>	<u>283,419</u>
21			
22 Depreciation	-	-	-
23 Amortization	-	-	-
24 Taxes Other Than Income	-	-	-
25 Income Taxes - Federal	(9,818,976)	(9,762,151)	(56,825)
26 Income Taxes - State	(2,223,726)	(2,210,857)	(12,869)
27 Income Taxes - Def Net	-	-	-
28 Investment Tax Credit Adj.	-	-	-
29 Misc Revenue & Expense	-	-	-
30			
31 Total Operating Expenses:	<u>87,505,021</u>	<u>87,291,296</u>	<u>213,725</u>
32			
33 Operating Rev For Return:	<u>(36,919,426)</u>	<u>(36,705,701)</u>	<u>(213,725)</u>
34			
35 Rate Base:			
36 Electric Plant In Service	-	-	-
37 Plant Held for Future Use	-	-	-
38 Misc Deferred Debits	-	-	-
39 Elec Plant Acq Adj	-	-	-
40 Nuclear Fuel	-	-	-
41 Prepayments	-	-	-
42 Fuel Stock	-	-	-
43 Material & Supplies	-	-	-
44 Working Capital	827,098	825,078	2,020
45 Weatherization Loans	-	-	-
46 Misc Rate Base	-	-	-
47			
48 Total Electric Plant:	<u>827,098</u>	<u>825,078</u>	<u>2,020</u>
49			
50 Rate Base Deductions:			
51 Accum Prov For Deprec	-	-	-
52 Accum Prov For Amort	-	-	-
53 Accum Def Income Tax	-	-	-
54 Unamortized ITC	-	-	-
55 Customer Adv For Const	-	-	-
56 Customer Service Deposits	-	-	-
57 Misc Rate Base Deductions	-	-	-
58			
59 Total Rate Base Deductions	<u>-</u>	<u>-</u>	<u>-</u>
60			
61 Total Rate Base:	<u>827,098</u>	<u>825,078</u>	<u>2,020</u>
62			
63 Return on Rate Base	-0.770%	-0.766%	-0.004%
64			
65 Return on Equity	-1.474%	-1.466%	-0.009%
66			
67 TAX CALCULATION:			
68 Operating Revenue	(48,962,128)	(48,678,709)	(283,419)
69 Other Deductions	-	-	-
70 Interest (AFUDC)	-	-	-
71 Interest	18,625	18,580	45
72 Schedule "M" Additions	-	-	-
73 Schedule "M" Deductions	-	-	-
74 Income Before Tax	<u>(48,980,754)</u>	<u>(48,697,289)</u>	<u>(283,465)</u>
75			
76 State Income Taxes	<u>(2,223,726)</u>	<u>(2,210,857)</u>	<u>(12,869)</u>
77 Taxable Income	<u>(46,757,027)</u>	<u>(46,486,432)</u>	<u>(270,595)</u>
78			
79 Federal Income Taxes + Other	<u>(9,818,976)</u>	<u>(9,762,151)</u>	<u>(56,825)</u>
APPROXIMATE PRICE CHANGE	50,743,235	50,449,764	293,470

PacifiCorp  
Oregon General Rate Case - December 2023  
Net Power Costs

	ACCOUNT	Type	TOTAL COMPANY	FACTOR	FACTOR %	OREGON ALLOCATED	REF#
<b>Adjustment to Revenue:</b>							
<b>Sales for Resale (Account 447)</b>							
Existing Firm PPL	447NPC	3	6,438,454	SG	26.002%	1,674,111	5.1.1_R
Existing Firm UPL	447NPC	3	-	SG	26.002%	-	5.1.1_R
Post-Merger Firm	447NPC	3	184,555,129	SG	26.002%	47,987,584	5.1.1_R
Non-Firm	447NPC	3	3,707,443	SE	24.920%	923,900	5.1.1_R
<b>Total Sales for Resale</b>			<u>194,701,026</u>			<u>50,585,595</u>	
<b>Adjustment to Expense:</b>							
<b>Purchased Power (Account 555)</b>							
Existing Firm Demand PPL	555NPC	3	8,263,723	SG	26.002%	2,148,713	5.1.1_R
Existing Firm Demand UPL	555NPC	3	12,335,572	SG	26.002%	3,207,466	5.1.1_R
Existing Firm Energy	555NPC	3	44,916,482	SE	24.920%	11,193,250	5.1.1_R
Post-merger Firm	555NPC	3	350,711,442	SG	26.002%	91,191,151	5.1.1_R
Post-merger Firm - Situs	555NPC	3	(10,277,762)	UT	Situs	-	5.1.1_R
Secondary Purchases	555NPC	3	(62,781,784)	SE	24.920%	(15,645,308)	5.1.1_R
Seasonal Contracts	555NPC	3		SG	26.002%	-	5.1.1_R
Other Generation	555NPC	3		SG	26.002%	-	5.1.1_R
<b>Total Purchased Power Adjustments:</b>			<u>343,167,672</u>			<u>92,095,272</u>	
<b>Wheeling Expense (Account 565)</b>							
Existing Firm PPL	565NPC	3	23,886,724	SG	26.002%	6,210,969	5.1.1_R
Existing Firm UPL	565NPC	3	-	SG	26.002%	-	5.1.1_R
Post-merger Firm	565NPC	3	(8,853,324)	SG	26.002%	(2,302,020)	5.1.1_R
Non-Firm	565NPC	3	(9,078,574)	SE	24.920%	(2,262,393)	5.1.1_R
<b>Total Wheeling Expense Adjustments:</b>			<u>5,954,825</u>			<u>1,646,555</u>	
<b>Fuel Expense (Accounts 501, 503, 547)</b>							
Fuel - Overburden Amortization - Idaho	501NPC	3	(35,987)	ID	Situs	-	5.1.1_R
Fuel - Overburden Amortization - Wyoming	501NPC	3	(101,258)	WYP	Situs	-	5.1.1_R
Fuel Consumed - Coal	501NPC	3	26,509,508	SE	24.920%	6,606,206	5.1.1_R
Fuel Consumed - Gas	501NPC	3	(695,314)	SE	24.920%	(173,273)	5.1.1_R
Steam from Other Sources	503NPC	3	(635,805)	SE	24.920%	(158,444)	5.1.1_R
Natural Gas Consumed	547NPC	3	41,083,241	SE	24.920%	10,238,001	5.1.1_R
Simple Cycle Combustion Turbines	547NPC	3	11,269,882	SE	24.920%	2,808,470	5.1.1_R
Cholla / APS Exchange	501NPC	3	(31,040,758)	SE	24.920%	(7,735,400)	5.1.1_R
<b>Total Fuel Expense Adjustments:</b>			<u>46,353,509</u>			<u>11,585,561</u>	
<b>Total Power Cost Adjustment</b>			<u>200,774,981</u>			<u>54,741,793</u>	
Post-merger Firm Type 1	555NPC	1	(33,207,191)	SG	26.002%	(8,634,454)	5.1.1_R
Oregon Solar Project	555NPC	3	2,571,370	OR	Situs	2,571,370	5.1.4_R

**Description of Adjustment:**

This net power cost adjustment normalizes power costs by adjusting sales for resale, purchased power, wheeling and fuel in a manner consistent with the contractual terms of sales and purchase agreements, and normal hydro and temperature conditions for the 12 month period ending December 2023. The GRID study for this adjustment is based on forecast loads for the test period.

As described in the testimony of Sherona L. Cheung, this adjustment is included in the calculation of overall revenue requirement for computational purposes only; the Company is not requesting recovery of NPC as part of the general rate case.

PacifiCorp  
Oregon General Rate Case - December 2023  
Net Power Cost Adjustment

Description	FERC Account	(1) Total Account (B Tabs)	(2) Remove Non-NPC / NPC Mechanism Accruals	(3) Unadjusted NPC (1) + (2)	(4) Type 1 Adjustments	(5) Type 1 Normalized NPC (3) + (4)	(6) Type 3 Pro Forma NPC	(7) Type 3 Adjustment (6) - (5)	Factor	
<b>Sales for Resale (Account 447)</b>										
Existing Firm Sales PPL		447.12	-	-	-	-	6,438,454	6,438,454	SG	
Existing Firm Sales UPL		447.122	-	-	-	-	-	-	SG	
Post-merger Firm Sales	447.13, .14, .20, .61, .62	203,582,709.68	-	203,582,710	-	203,582,710	388,137,839	184,555,129	SG	
Non-firm Sales		447.5	(3,707,443)	(3,707,443)	-	(3,707,443)	-	3,707,443	SE	
Transmission Services		447.9	124,586	(124,586)	-	-	-	-	S	
On-system Wholesale Sales		447.1	12,315,816	(12,315,816)	-	-	-	-	S	
<b>Total Revenue Adjustments</b>		<b>212,315,668</b>	<b>(12,440,401)</b>	<b>199,875,267</b>	<b>-</b>	<b>199,875,267</b>	<b>394,576,293</b>	<b>194,701,026</b>		
<b>Purchased Power (Account 555)</b>										
Existing Firm Demand PPL		555.66	-	-	-	-	8,263,723	8,263,723	SG	
Existing Firm Demand UPL		555.68	-	-	-	-	12,335,572	12,335,572	SG	
Existing Firm Energy		555.65, 555.69	-	-	-	-	44,916,482	44,916,482	SE	
Post-merger Firm	555.26, .55, .59, .61, .62, .63, .64, .67, .8	621,018,560	-	621,018,560	-	621,018,560	938,522,812	317,504,251	SG	
Post-merger Firm - Situs		555.27	10,277,762	10,277,762	-	10,277,762	-	(10,277,762)	UT	
Secondary Purchases		555.7, 555.25	62,781,784	62,781,784	-	62,781,784	-	(62,781,784)	SE	
NPC Deferral Mechanism		555.57	(171,224)	171,224	-	-	-	-	OTHER	
Seasonal Contracts		-	-	-	-	-	-	-	SG	
Wind Integration Charge		-	-	-	-	-	-	-	SG	
RPS Compliance Purchases	555.22, 555.23, 555.24	4,161,734	(4,161,734)	-	-	-	-	-	OTHER	
BPA Regional Adjustments	555.11, 555.12, 555.133	-	-	-	-	-	-	-	S	
Post-merger Firm Type 1		-	-	-	(33,207,191)	(33,207,191)	-	33,207,191	SG	
<b>Total Purchased Power Adjustment</b>		<b>698,068,616</b>	<b>(3,990,510)</b>	<b>694,078,107</b>	<b>(33,207,191)</b>	<b>660,870,916</b>	<b>1,004,038,588</b>	<b>343,167,672</b>		
<b>Wheeling (Account 565)</b>										
Existing Firm PPL		565.26	-	-	-	-	23,886,724	23,886,724	SG	
Existing Firm UPL		565.27	-	-	-	-	-	-	SG	
Post-merger Firm	565.0, 565.46, 565.1	133,395,046	-	133,395,046	-	133,395,046	124,541,723	(8,853,324)	SG	
Non-firm		565.25	15,971,607	15,971,607	-	15,971,607	6,893,033	(9,078,574)	SE	
<b>Total Wheeling Expense Adjustment</b>		<b>149,366,653</b>	<b>-</b>	<b>149,366,653</b>	<b>-</b>	<b>149,366,653</b>	<b>155,321,479</b>	<b>5,954,825</b>		
<b>Fuel Expense (Accounts 501, 503 and 547)</b>										
Fuel - Overburden Amortization - Idaho		501.12	35,987	-	35,987	-	35,987	(35,987)	ID	
Fuel - Overburden Amortization - Wyoming		501.12	101,258	-	101,258	-	101,258	(101,258)	WY	
Fuel Consumed - Coal		501.1	619,107,412	-	619,107,412	-	619,107,412	645,616,919	SE	
Fuel Consumed - Gas		501.35	18,260,998	-	18,260,998	-	18,260,998	17,565,684	(695,314)	SE
Steam From Other Sources		503	5,119,912	-	5,119,912	-	5,119,912	4,484,106	(635,805)	SE
Natural Gas Consumed		547.1	289,072,443	-	289,072,443	-	289,072,443	330,155,685	41,083,241	SE
Simple Cycle Combustion Turbines		547.1	1,980,087	-	1,980,087	-	1,980,087	13,249,969	11,269,882	SE
Cholla/APS Exchange		501.1	31,040,758	-	31,040,758	-	31,040,758	(31,040,758)	SE	
Fuel Regulatory Costs Deferral and Amort		501.15	6,207,125	(6,207,125)	-	-	-	-	S	
Fuel Regulatory Costs Deferral and Amort		501.15	3,129,281	(3,129,281)	-	-	-	-	SE	
Miscellaneous Fuel Costs	501.0, .2, .3, .4, .45, .5, .51	13,625,871	(13,625,871)	-	-	-	-	-	SE	
Miscellaneous Fuel Costs - Cholla	501.2, 501.45	264,509	(264,509)	-	-	-	-	-	SE	
<b>Total Fuel Expense</b>		<b>987,945,641</b>	<b>(23,226,786)</b>	<b>964,718,855</b>	<b>-</b>	<b>964,718,855</b>	<b>1,011,072,364</b>	<b>46,353,509</b>		
<b>Net Power Cost</b>		<b>1,623,065,242</b>	<b>(14,776,894)</b>	<b>1,608,288,348</b>	<b>(33,207,191)</b>	<b>1,575,081,157</b>	<b>1,775,856,138</b>	<b>200,774,981</b>		
					Ref 5.1_R		Ref 5.1.3_R	Ref 5.1_R		

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**Study Results**  
**MERGED PEAK/ENERGY SPLIT**  
**(\$)**

	<u>Merged</u> <u>1/2023 - 12/2023</u>	<u>Pre-Merger</u> <u>Demand</u>	<u>Pre-Merger</u> <u>Energy</u>	<u>Non-Firm</u>	<u>Post-Merger</u>
<b>SPECIAL SALES FOR RESALE</b>					
Pacific Pre Merger	6,438,454	6,438,454			
Post Merger	388,137,839				388,137,839
Utah Pre Merger	-	-			
NonFirm Sub Total	-			-	
<b>TOTAL SPECIAL SALES</b>	<b>394,576,293</b>	<b>6,438,454</b>	<b>-</b>	<b>-</b>	<b>388,137,839</b>
<b>PURCHASED POWER &amp; NET INTERCHANGE</b>					
BPA Peak Purchase	-	-			
Pacific Capacity	-	-			
Mid Columbia	2,308,252	692,476	1,615,776		
Misc/Pacific	154,785	32,097	122,688		
Q.F. Contracts/PPL	-	7,539,150	36,731,840		102,829,448
Small Purchases west	-	-	-		
<b>Pacific Sub Total</b>	<b>2,463,036</b>	<b>8,263,723</b>	<b>38,470,304</b>	<b>-</b>	<b>102,829,448</b>
Gemstate	1,145,216		1,145,216		
GSLM	-		-		
QF Contracts/UPL	-	12,335,572	5,286,674		163,605,361
IPP Layoff	-	-	-		
Small Purchases east	14,288		14,288		
UP&L to PP&L	-	-	-		
<b>Utah Sub Total</b>	<b>1,159,504</b>	<b>12,335,572</b>	<b>6,446,178</b>	<b>-</b>	<b>163,605,361</b>
APS Supplemental	-				-
Avoided Cost Resource	-				-
Appaloosa 1A Solar	-				-
Appaloosa 1B Solar	-				-
Castle Solar UoU	-				-
Castle Solar IHC	-				-
Cedar Springs Wind	11,723,272				11,723,272
Cedar Springs Wind III	8,908,094				8,908,094
Combine Hills Wind	5,518,680				5,518,680
Cove Mountain Solar	3,833,283				3,833,283
Cove Mountain Solar II	9,492,755				9,492,755
Deseret Purchase	35,888,318				35,888,318
Eagle Mountain - UAMPS/UMPA	-				-
Elektron Solar 20 yr	-				-
Elektron Solar 25yr	-				-
Georgia-Pacific Camas	-				-
Graphite Solar	6,272,497				6,272,497
Hermiston Purchase	-				-
Horseshoe Solar	-				-
Hurricane Purchase	185,380				185,380
Hunter Solar	7,051,153				7,051,153
MagCorp	-				-
MagCorp Reserves	3,837,570				3,837,570
Milican Solar	2,814,730				2,814,730
Milford Solar	6,975,304				6,975,304
Nucor	7,129,800				7,129,800
Old Mill Solar	-				-
Monsanto Reserves	20,600,000				20,600,000
Pavant III Solar	-				-
Prineville Solar	1,875,216				1,875,216
Rock River Wind	-				-
Rocket Solar	-				-
Sigurd Solar	5,917,296				5,917,296
Skysol Solar	9,192,400				9,192,400
Soda Lake Geothermal	-				-
Three Buttes Wind	20,712,516				20,712,516
Top of the World Wind	40,663,534				40,663,534
Tri-State Purchase	-				-
Wolverine Creek Wind	10,515,791				10,515,791
PSCo Exchange	-				-
West Valley Toll	-				-
UT Solar Adjustment	(15,765,252)				(15,765,252)
Seasonal Purchased Power Constellation 2013-2016	-				-

Study Results  
MERGED PEAK/ENERGY SPLIT  
(\$)

	Merged 1/2023 - 12/2023	Pre-Merger Demand	Pre-Merger Energy	Non-Firm	Post-Merger
Short Term Firm Purchases	468,745,665				468,745,665
New Firm Sub Total	672,088,003	-	-	-	672,088,003
Integration Charge	-				-
Non Firm Sub Total	-				-
TOTAL PURCHASED PW & NET INT.	675,710,544	20,599,294	44,916,482	-	938,522,812
WHEELING & U. OF F. EXPENSE					
Pacific Firm Wheeling and Use of Facilities	23,886,724	23,886,724			
Utah Firm Wheeling and Use of Facilities	-	-			
Post Merger	124,541,723				124,541,723
Nonfirm Wheeling	6,893,033			6,893,033	
TOTAL WHEELING & U. OF F. EXPENSE	155,321,479	23,886,724	-	6,893,033	124,541,723
THERMAL FUEL BURN EXPENSE					
Carbon	-				-
Cholla	-				-
Colstrip	19,954,208			19,954,208	
Craig	23,194,373			23,194,373	
Chehalis	59,574,169			59,574,169	
Currant Creek	74,516,315			74,516,315	
Dave Johnston	67,104,688			67,104,688	
Gadsby	17,565,684			17,565,684	
Gadsby CT	13,249,969			13,249,969	
Hayden	10,209,108			10,209,108	
Hermiston	35,073,753			35,073,753	
Hunter	137,092,516			137,092,516	
Huntington	120,134,936			120,134,936	
Jim Bridger	201,228,966			201,228,966	
Lake Side 1	83,540,497			83,540,497	
Lake Side 2	65,438,898			65,438,898	
Naughton - Gas	26,730,826			26,730,826	
Naughton	32,871,918			32,871,918	
Wyodak	33,826,206			33,826,206	
Gas Physical	(4,287,892)			(4,287,892)	
Gas Swaps	(50,230,977)			(50,230,977)	
Clay Basin Gas Storage	(452,163)			(452,163)	
Pipeline Reservation Fees	40,252,259			40,252,259	
TOTAL FUEL BURN EXPENSE	1,006,588,257	-	-	1,006,588,257	-
OTHER GENERATION EXPENSE					
Blundell	4,484,106			4,484,106	
TOTAL OTHER GEN. EXPENSE	4,484,106.36	-	-	4,484,106	-
NET POWER COST	1,775,856,138	38,047,564	44,916,482	1,017,965,397	674,926,696

PacifiCorp  
Oregon General Rate Case - December 2023  
Net Power Cost Adjustment  
Oregon Situs Adjustments

	Total	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23
Net Energy impact - Situs Solar	(114,912)	(13,248)	(14,301)	11,947	42,733	59,441	53,577	(86,601)	(108,804)	(61,296)	6,532	644	(5,536)
REP Adjustments (Total Company)	(6,929,801)	(185,150)	(179,001)	(549,510)	(571,502)	(794,337)	(1,113,319)	(960,447)	(814,962)	(547,093)	(492,025)	(345,058)	(377,396)
Allocated on SG Factor (26.002%)	(1,801,870)	(48,142)	(46,543)	(142,882)	(148,600)	(206,542)	(289,483)	(249,733)	(211,904)	(142,254)	(127,935)	(89,721)	(98,130)
REP Adjustments (Oregon Allocation)	4,488,152	(271)	268	348,128	346,409	526,864	822,695	767,609	658,786	405,503	304,261	164,511	143,390
<b>Total OR Situs Adjustment</b>	<b>2,571,370</b>	(61,662)	(60,577)	217,192	240,542	379,763	586,790	431,275	338,078	201,953	182,858	75,434	39,724



PacifiCorp  
Oregon General Rate Case - December 2023  
BSOR & WRAP Feed

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
BOSR Fee	557	3	90,000	SG	26.002%	23,402	5.2.1
WRAP Fee	557	3	1,000,000	SG	26.002%	260,018	5.2.1

**Description of Adjustment:**

This adjustment adds the two new fees to O&M costs. The first one is for EIM Board of State Regulators (BOSR). The primary function of the Body of State Regulators is to provide a forum for state regulators to learn about the Western Energy Imbalance Market (EIM), EIM Governing Body and related ISO developments that may be relevant to their jurisdictional responsibilities. Secondly, given the recent trend in decommissioning coal plants and increasing renewable integration, the Resource Adequacy group is working to coordinate activities related to a comprehensive review of resource adequacy in the NWPP region, through the development and implementation of a Western Resource Adequacy Program (WRAP). For further discussion on these fees, please refer to direct testimony of Mr. Michael G. Wilding.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

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**PacifiCorp**  
**Oregon General Rate Case – December 2023**  
**Depreciation and Amortization Adjustment Index**

The following adjustments were used to arrive at the normalized levels of depreciation and amortization expense along with the associated reserve balances reflected in the test period.

- 6.1\_R Depreciation & Amortization Expense – Revised for allocation factor impact only
- 6.2\_R Depreciation & Amortization Reserve – Revised for allocation factor impact only
- 6.3\_R Depreciation Allocation Correction – Revised for allocation factor impact only
- 6.4 Repowering Buy Downs
- 6.5\_R Coal Depreciable Life Update – Revised for allocation factor impact only
- 6.6\_R Bridger Coal Reclamation Costs – Revised for allocation factor impact only

**Pacificorp**  
**Oregon General Rate Case - December 2023**  
**Tab 6 Adjustment Summary**

	Total Adjustments	6.1_R Depreciation & Amortiation Expense	6.2_R Depreciation & Amortization Reserve	6.3_R Depreciation Allocation Correction	6.4 Repowering Buy Downs	6.5_R Coal Depreciable Life Update	6.6_R Bridger Mine Reclamation Costs
1 Operating Revenues:							
2 General Business Revenues	-	-	-	-	-	-	-
3 Interdepartmental	-	-	-	-	-	-	-
4 Special Sales	-	-	-	-	-	-	-
5 Other Operating Revenues	-	-	-	-	-	-	-
6 Total Operating Revenues	-	-	-	-	-	-	-
7							
8 Operating Expenses:							
9 Steam Production	3,613,145	-	-	-	-	-	3,613,145
10 Nuclear Production	-	-	-	-	-	-	-
11 Hydro Production	-	-	-	-	-	-	-
12 Other Power Supply	-	-	-	-	-	-	-
13 Transmission	-	-	-	-	-	-	-
14 Distribution	-	-	-	-	-	-	-
15 Customer Accounting	-	-	-	-	-	-	-
16 Customer Service & Info	-	-	-	-	-	-	-
17 Sales	-	-	-	-	-	-	-
18 Administrative & General	-	-	-	-	-	-	-
19							
20 Total O&M Expenses	3,613,145	-	-	-	-	-	3,613,145
21							
22 Depreciation	58,358,262	59,532,658	-	(366,005)	-	(808,391)	-
23 Amortization	24,556,791	1,783,848	-	-	22,772,942	-	-
24 Taxes Other Than Income	-	-	-	-	-	-	-
25 Income Taxes - Federal	(13,638,561)	(12,291,232)	2,639,013	73,368	(4,406,113)	321,820	24,583
26 Income Taxes - State	(3,088,756)	(2,783,624)	597,663	16,616	(997,863)	72,883	5,567
27 Income Taxes - Def Net	(253,869)	-	-	-	833,235	(198,756)	(888,348)
28 Investment Tax Credit Adj.	-	-	-	-	-	-	-
29 Misc Revenue & Expense	-	-	-	-	-	-	-
30							
31 Total Operating Expenses:	69,547,012	46,241,651	3,236,677	(276,022)	18,202,202	(612,444)	2,754,948
32							
33 Operating Rev For Return:	(69,547,012)	(46,241,651)	(3,236,677)	276,022	(18,202,202)	612,444	(2,754,948)
34							
35 Rate Base:							
36 Electric Plant In Service	-	-	-	-	-	-	-
37 Plant Held for Future Use	-	-	-	-	-	-	-
38 Misc Deferred Debits	-	-	-	-	-	-	-
39 Elec Plant Acq Adj	-	-	-	-	-	-	-
40 Nuclear Fuel	-	-	-	-	-	-	-
41 Prepayments	-	-	-	-	-	-	-
42 Fuel Stock	-	-	-	-	-	-	-
43 Material & Supplies	-	-	-	-	-	-	-
44 Working Capital	(123,955)	(142,488)	30,593	851	(51,078)	3,731	34,436
45 Weatherization Loans	-	-	-	-	-	-	-
46 Misc Rate Base	-	-	-	-	-	-	-
47							
48 Total Electric Plant:	(123,955)	(142,488)	30,593	851	(51,078)	3,731	34,436
49	-	-	-	-	-	-	-
50 Rate Base Deductions:							
51 Accum Prov For Deprec	(750,859,439)	-	(568,068,167)	-	(183,195,467)	404,195	-
52 Accum Prov For Amort	(16,554,005)	-	(16,554,005)	-	-	-	-
53 Accum Def Income Tax	(602,826)	-	-	-	(2,488,860)	99,378	1,786,656
54 Unamortized ITC	-	-	-	-	-	-	-
55 Customer Adv For Const	-	-	-	-	-	-	-
56 Customer Service Deposits	-	-	-	-	-	-	-
57 Misc Rate Base Deductions	(7,266,788)	-	-	-	-	-	(7,266,788)
58							
59 Total Rate Base Deductions	(775,283,057)	-	(584,622,172)	-	(185,684,327)	503,573	(5,480,132)
60							
61 Total Rate Base:	(775,407,012)	(142,488)	(584,591,579)	851	(185,735,405)	507,304	(5,445,695)
62							
63 Return on Rate Base	-0.825%	-0.963%	0.440%	0.007%	-0.260%	0.015%	-0.063%
64							
65 Return on Equity	-1.579%	-1.844%	0.842%	0.013%	-0.497%	0.028%	-0.121%
66							
67 TAX CALCULATION:							
68 Operating Revenue	(86,528,198)	(61,316,507)	-	366,005	(22,772,942)	808,391	(3,613,145)
69 Other Deductions	-	-	-	-	-	-	-
70 Interest (AFUDC)	-	-	-	-	-	-	-
71 Interest	(17,461,358)	(3,209)	(13,164,393)	19	(4,182,568)	11,424	(122,631)
72 Schedule "M" Additions	1,032,557	-	-	-	(3,388,979)	808,391	3,613,145
73 Schedule "M" Deductions	-	-	-	-	-	-	-
74 Income Before Tax	(68,034,283)	(61,313,298)	13,164,393	365,986	(21,979,353)	1,605,357	122,631
75							
76 State Income Taxes	(3,088,756)	(2,783,624)	597,663	16,616	(997,863)	72,883	5,567
77 Taxable Income	(64,945,526)	(58,529,674)	12,566,730	349,370	(20,981,490)	1,532,474	117,064
78							
79 Federal Income Taxes + Other	(13,638,561)	(12,291,232)	2,639,013	73,368	(4,406,113)	321,820	24,583
APPROXIMATE PRICE CHANGE	16,981,512	63,436,775	(54,702,296)	(378,661)	6,185,445	(789,050)	3,229,299

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Depreciation & Amortization Expense**  
**Adjustment to Test Period Levels**

	ACCOUNT	Type	TOTAL COMPANY	FACTOR	FACTOR %	OREGON ALLOCATED	REF#
<b>Adjustment to Expense:</b>							
Steam Depreciation Expense	403SP	3	26,840,673	SG	26.002%	6,979,048	
Steam Depreciation Expense	403SP	3	19,020,532	SG	26.002%	4,945,673	
Steam Depreciation Expense	403SP	3	118,268,095	SG	26.002%	30,751,787	
Steam Depreciation Expense	403SP	3	(7,589,695)	SG	26.002%	(1,973,454)	
Hydro Depreciation Expense	403HP	3	28,228,285	SG-P	26.002%	7,339,851	
Hydro Depreciation Expense	403HP	3	(99,213)	SG-U	26.002%	(25,797)	
Hydro Depreciation Expense	403HP	3	(25,970,964)	SG-P	26.002%	(6,752,908)	
Hydro Depreciation Expense	403HP	3	1,945,365	SG-U	26.002%	505,829	
Other Depreciation Expense	403OP	3	-	SG	26.002%	-	
Other Depreciation Expense	403OP	3	2,570,714	SG	26.002%	668,431	
Other Depreciation Expense	403OP	3	39,134,400	SG-W	26.002%	10,175,633	
Other Depreciation Expense	403OP	3	-	OR	Situs	-	
Other Depreciation Expense	403OP	3	624,964	SG	26.002%	162,502	
Transmission Depreciation Expense	403TP	3	(353,434)	SG	26.002%	(91,899)	
Transmission Depreciation Expense	403TP	3	(318,735)	SG	26.002%	(82,877)	
Transmission Depreciation Expense	403TP	3	13,515,484	SG	26.002%	3,514,264	
Distribution Depreciation Expense	403360	3	243,644	OR	Situs	7,873	
Distribution Depreciation Expense	403361	3	461,852	OR	Situs	14,924	
Distribution Depreciation Expense	403362	3	3,832,165	OR	Situs	123,826	
Distribution Depreciation Expense	403364	3	5,008,218	OR	Situs	161,827	
Distribution Depreciation Expense	403365	3	3,151,495	OR	Situs	101,832	
Distribution Depreciation Expense	403366	3	1,563,558	OR	Situs	50,522	
Distribution Depreciation Expense	403367	3	3,647,465	OR	Situs	117,858	
Distribution Depreciation Expense	403368	3	5,521,053	OR	Situs	178,398	
Distribution Depreciation Expense	403369	3	3,414,086	OR	Situs	110,317	
Distribution Depreciation Expense	403370	3	934,553	OR	Situs	30,198	
Distribution Depreciation Expense	403371	3	32,312	OR	Situs	1,044	
Distribution Depreciation Expense	403373	3	231,403	OR	Situs	7,477	
General Depreciation Expense	403GP	3	44,174	CA	Situs	-	
General Depreciation Expense	403GP	3	602,059	OR	Situs	602,059	
General Depreciation Expense	403GP	3	16,660	WA	Situs	-	
General Depreciation Expense	403GP	3	269,935	WYP	Situs	-	
General Depreciation Expense	403GP	3	987,962	UT	Situs	-	
General Depreciation Expense	403GP	3	103,649	ID	Situs	-	
General Depreciation Expense	403GP	3	(20,100)	WYU	Situs	-	
General Depreciation Expense	403GP	3	(2,389)	SG	26.002%	(621)	
General Depreciation Expense	403GP	3	(23,398)	SG	26.002%	(6,084)	
General Depreciation Expense	403GP	3	603,633	SG	26.002%	156,955	
General Depreciation Expense	403GP	3	6,592,574	SO	27.125%	1,788,250	
General Depreciation Expense	403GP	3	(66,807)	SG	26.002%	(17,371)	
General Depreciation Expense	403GP	3	701	SG	26.002%	182	
General Depreciation Expense	403GP	3	(43,613)	CN	30.990%	(13,516)	
General Depreciation Expense	403GP	3	2,511	SE	24.920%	626	
			<u>252,925,826</u>			<u>59,532,658</u>	6.1.2

**Description of Adjustment:**

This adjustment reflects the incremental depreciation expense that is calculated on the plant additions included in this filing in adjustment 8.4. The annualized 2022 depreciation and amortization expense for the test period is calculated by applying the current composite depreciation and amortization rates to the December 2022 projected plant balances.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Depreciation & Amortization Expense**  
**Adjustment to Test Period Levels**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Intangible Amortization	404IP	3	-	CA	Situs	-	
Intangible Amortization	404IP	3	264,103	CN	30.990%	81,845	
Intangible Amortization	404IP	3	(1,673)	SG	26.002%	(435)	
Intangible Amortization	404IP	3	(78,646)	SG	26.002%	(20,449)	
Intangible Amortization	404IP	3	(8)	ID	Situs	-	
Intangible Amortization	404IP	3	2	OR	Situs	2	
Intangible Amortization	404IP	3	(14,686)	SE	24.920%	(3,660)	
Intangible Amortization	404IP	3	(8,908,817)	SG	26.002%	(2,316,449)	
Intangible Amortization	404IP	3	(14,435)	SG-P	26.002%	(3,753)	
Intangible Amortization	404IP	3	21,234	SG-U	26.002%	5,521	
Intangible Amortization	404IP	3	(13,762)	SG	26.002%	(3,578)	
Intangible Amortization	404IP	3	14,942,879	SO	27.125%	4,053,287	
Intangible Amortization	404IP	3	974	UT	Situs	-	
Intangible Amortization	404IP	3	16	WA	Situs	-	
Intangible Amortization	404IP	3	(2,422)	WYP	Situs	-	
Intangible Amortization	404IP	3	-	WYU	Situs	-	
Hydro Amortization	404HP	3	-	SG	26.002%	-	
Hydro Amortization	404HP	3	0	SG-P	26.002%	0	
Hydro Amortization	404HP	3	-	SG-U	26.002%	-	
Other Amortization	404OP	3	-	SG	26.002%	-	
General Amortization	404GP	3	(20)	CA	Situs	-	
General Amortization	404GP	3	-	CN	30.990%	-	
General Amortization	404GP	3	29,179	OR	Situs	29,179	
General Amortization	404GP	3	(138,845)	SO	27.125%	(37,662)	
General Amortization	404GP	3	(832)	UT	Situs	-	
General Amortization	404GP	3	3,665	WA	Situs	-	
General Amortization	404GP	3	0	WYP	Situs	-	
General Amortization	404GP	3	-	WYU	Situs	-	
			<u>6,087,906</u>			<u>1,783,848</u>	6.1.3

**Description of Adjustment:**

This adjustment reflects the incremental depreciation expense that is calculated on the plant additions included in this filing in adjustment 8.4. The annualized 2022 depreciation and amortization expense for the test period is calculated by applying the current composite depreciation and amortization rates to the December 2022 projected plant balances.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Depreciation and Amortization Reserve**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Steam Depreciation Reserve	108SP	3	(93,682,972)	SG	26.002%	(24,359,223)	
Steam Depreciation Reserve	108SP	3	(69,456,778)	SG	26.002%	(18,059,986)	
Steam Depreciation Reserve	108SP	3	(1,335,136,315)	SG	26.002%	(347,158,955)	
Steam Depreciation Reserve	108SP	3	-	SG	26.002%	-	
Hydro Depreciation Reserve	108HP	3	23,341,096	SG-P	26.002%	6,069,096	
Hydro Depreciation Reserve	108HP	3	(1,290,381)	SG-U	26.002%	(335,522)	
Hydro Depreciation Reserve	108HP	3	(53,037,520)	SG-P	26.002%	(13,790,689)	
Hydro Depreciation Reserve	108HP	3	(10,810,908)	SG-U	26.002%	(2,811,026)	
Other Depreciation Reserve	108OP	3	-	SG	26.002%	-	
Other Depreciation Reserve	108OP	3	(63,870,472)	SG	26.002%	(16,607,448)	
Other Depreciation Reserve	108OP	3	(199,200,573)	SG-W	26.002%	(51,795,657)	
Other Depreciation Reserve	108OP	3	-	OR	Situs	-	
Other Depreciation Reserve	108OP	3	(5,629,717)	SG	26.002%	(1,463,826)	
Transmission Depreciation Reserve	108TP	3	(9,151,224)	SG	26.002%	(2,379,479)	
Transmission Depreciation Reserve	108TP	3	(10,160,453)	SG	26.002%	(2,641,897)	
Transmission Depreciation Reserve	108TP	3	(154,513,575)	SG	26.002%	(40,176,251)	
Distribution Depreciation Reserve	108360	3	(1,702,246)	OR	Situs	(322,546)	
Distribution Depreciation Reserve	108361	3	(3,226,778)	OR	Situs	(611,418)	
Distribution Depreciation Reserve	108362	3	(26,773,824)	OR	Situs	(5,073,172)	
Distribution Depreciation Reserve	108364	3	(34,990,444)	OR	Situs	(6,630,078)	
Distribution Depreciation Reserve	108365	3	(22,018,252)	OR	Situs	(4,172,074)	
Distribution Depreciation Reserve	108366	3	(10,923,966)	OR	Situs	(2,069,901)	
Distribution Depreciation Reserve	108367	3	(25,483,401)	OR	Situs	(4,828,659)	
Distribution Depreciation Reserve	108368	3	(38,573,422)	OR	Situs	(7,308,990)	
Distribution Depreciation Reserve	108369	3	(23,852,875)	OR	Situs	(4,519,703)	
Distribution Depreciation Reserve	108370	3	(6,529,351)	OR	Situs	(1,237,198)	
Distribution Depreciation Reserve	108371	3	(225,751)	OR	Situs	(42,776)	
Distribution Depreciation Reserve	108373	3	(1,616,725)	OR	Situs	(306,341)	
General Depreciation Reserve	108GP	3	(822,830)	CA	Situs	-	
General Depreciation Reserve	108GP	3	(9,965,858)	OR	Situs	(9,965,858)	
General Depreciation Reserve	108GP	3	(1,079,525)	WA	Situs	-	
General Depreciation Reserve	108GP	3	(1,880,858)	WYP	Situs	-	
General Depreciation Reserve	108GP	3	(9,588,617)	UT	Situs	-	
General Depreciation Reserve	108GP	3	(2,523,222)	ID	Situs	-	
General Depreciation Reserve	108GP	3	(664,947)	WYU	Situs	-	
General Depreciation Reserve	108GP	3	192,685	SG	26.002%	50,101	
General Depreciation Reserve	108GP	3	382,208	SG	26.002%	99,381	
General Depreciation Reserve	108GP	3	(12,094,928)	SG	26.002%	(3,144,894)	
General Depreciation Reserve	108GP	3	(9,553,108)	SO	27.125%	(2,591,301)	
General Depreciation Reserve	108GP	3	-	SG	26.002%	-	
General Depreciation Reserve	108GP	3	(17,612)	SG	26.002%	(4,579)	
General Depreciation Reserve	108GP	3	360,700	CN	30.990%	111,781	
General Depreciation Reserve	108GP	3	43,824	SE	24.920%	10,921	
Mining Depreciation Reserve	108MP	3	-	SE	24.920%	-	
			<u>(2,225,728,915)</u>			<u>(568,068,167)</u>	6.2.2

**Description of Adjustment:**

This adjustment steps forward the depreciation reserve to a December 2022 adjusted level. Accumulated depreciation and amortization balances are calculated by applying pro forma depreciation and amortization expense and plant retirements to the June 2021 balances. The reserve balances are calculated on a monthly basis to walk the balances forward from June 30, 2021 to December 31, 2022. An incremental amount has been added to the December 31, 2022 balance to reflect the annualized depreciation expense in adjustment 6.1.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Depreciation and Amortization Reserve**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Intangible Amortization Reserve	111IP	3	(2,648)	CA	Situs	-	
Intangible Amortization Reserve	111IP	3	(20,089,447)	CN	30.990%	(6,225,705)	
Intangible Amortization Reserve	111IP	3	(43,567)	ID	Situs	-	
Intangible Amortization Reserve	111IP	3	(31,176)	SG	26.002%	(8,106)	
Intangible Amortization Reserve	111IP	3	(10,998)	OR	Situs	(10,998)	
Intangible Amortization Reserve	111IP	3	86,607	SE	24.920%	21,583	
Intangible Amortization Reserve	111IP	3	(9,577,171)	SG	26.002%	(2,490,233)	
Intangible Amortization Reserve	111IP	3	(3,937,327)	SG-P	26.002%	(1,023,774)	
Intangible Amortization Reserve	111IP	3	(206,561)	SG-U	26.002%	(53,710)	
Intangible Amortization Reserve	111IP	3	(22,536,499)	SO	27.125%	(6,113,073)	
Intangible Amortization Reserve	111IP	3	-	SG	26.002%	-	
Intangible Amortization Reserve	111IP	3	(48,092)	UT	Situs	-	
Intangible Amortization Reserve	111IP	3	(4,722)	WA	Situs	-	
Intangible Amortization Reserve	111IP	3	(24,624)	WYP	Situs	-	
Intangible Amortization Reserve	111IP	3	-	WYU	Situs	-	
Intangible Amortization Reserve	111IP	3	-	SG	26.002%	-	
Hydro Amortization Reserve	111HP	3	-	SG	26.002%	-	
Hydro Amortization Reserve	111HP	3	(467,544)	SG-P	26.002%	(121,570)	
Hydro Amortization Reserve	111HP	3	-	SG-U	26.002%	-	
Other Amortization Reserve	111OP	3	-	SG	26.002%	-	
General Amortization Reserve	111GP	3	-	CA	Situs	-	
General Amortization Reserve	111GP	3	-	CN	30.990%	-	
General Amortization Reserve	111GP	3	-	SG	26.002%	-	
General Amortization Reserve	111GP	3	(484,357)	OR	Situs	(484,357)	
General Amortization Reserve	111GP	3	(162,438)	SO	27.125%	(44,062)	
General Amortization Reserve	111GP	3	-	UT	Situs	-	
General Amortization Reserve	111GP	3	(144,403)	WA	Situs	-	
General Amortization Reserve	111GP	3	(79,754)	WYP	Situs	-	
General Amortization Reserve	111GP	3	-	WYU	Situs	-	
			<u>(57,764,719)</u>			<u>(16,554,005)</u>	6.2.3
Total Adjustment			<u>(2,283,493,634)</u>			<u>(584,622,172)</u>	

**Description of Adjustment:**

This adjustment steps forward the depreciation reserve to a December 2022 adjusted level. Accumulated depreciation and amortization balances are calculated by applying pro forma depreciation and amortization expense and plant retirements to the June 2021 balances. The reserve balances are calculated on a monthly basis to walk the balances forward from June 30, 2021 to December 31, 2022.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Depreciation Allocation Correction**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Remove system allocated deferral	403SP	1	(325,833)	SG	26.002%	(84,722)	6.3.1
Remove system allocated give-back reversal	403SP	1	<u>(1,081,784)</u>	SG	26.002%	<u>(281,283)</u>	6.3.2
			<u>(1,407,617)</u>			<u>(366,005)</u>	

**Description of Adjustment:**

The Company established a regulatory asset to track and defer any aggregate net increase in allocated depreciation expense in dockets in Wyoming, Utah and Idaho for depreciation rates that became effective January 1, 2014. New depreciation rates went into effect in January of 2021, which no longer require the giveback reallocation. This adjustment removes the deferral recorded in 2020 in base period data from test period results.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

Page 6.4 is included in Exhibit PAC 1002.

No changes to this adjustments were  
made as part of the Company's Reply  
filing.

**PacifiCorp  
Oregon General Rate Case - December 2023  
Coal Depreciable Life Update**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Depreciation Expense	403SP	3	(3,108,984)	SG	26.002%	(808,391)	6.5.1
<b>Adjustment to Rate Base:</b>							
Depreciation Reserve	108SP	3	1,554,492	SG	26.002%	404,195	6.5.1
<b>Adjustment to Tax</b>							
Schedule M Adjustment	SCHMAT	3	3,108,984	SG	26.002%	808,391	
Deferred Income Tax Expense	41110	3	(764,394)	SG	26.002%	(198,756)	
Accumulated Def Inc Tax Balance	282	3	382,197	SG	26.002%	99,378	

**Description of Adjustment:**

This pro forma adjustment includes the change in depreciation expense and reserve to align the depreciation lives with the 2021 IRP retirement dates for the following coal fired plants: Colstrip, Craig 2, and Hayden 1 & 2. Please see Page 6.5.2 for a summary of the proposed change in end of depreciable life for each generation facility included in this adjustment. Incremental reserves are reflected on a 13-month average basis.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Bridger Mine Reclamation Costs**

PAGE 6.6\_R

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Bridger Reclamation Costs	501	3	14,498,896	SE	24.920%	3,613,145	6.6.1
<b>Adjustment to Rate Base</b>							
Bridger Reclamation Costs	254	3	(7,266,788)	OR	Situs	(7,266,788)	6.6.1
<b>Adjustment to Tax:</b>							
Schedule M Adjustment	SCHMAT	3	14,498,896	SE	24.920%	3,613,145	6.6.1
Deferred Income Tax Expense	41110	3	(3,564,780)	SE	24.920%	(888,348)	6.6.1
Accumulated Def Inc Tax Balance	190	3	1,786,656	OR	Situs	1,786,656	6.6.1

**Description of Adjustment:**

This adjustment adds into test period results Bridger Mine final reclamation costs and incremental depreciation expense as approved in the Company's 2021 general rate case (UE 374), Order No. 20-473. Consistent with the approved adjustment from UE 374, an annual level of expense is reflected in this adjustment, while the regulatory liability balance is included on a 13-month-average basis for the year ending December 2023.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

## Tab 7 - Taxes

**PacifiCorp**  
**Oregon General Rate Case – December 2023**  
**Tax Adjustment Index**

The following adjustments were used to arrive at the normalized levels of tax expenses. The Company's 12 months ended June 2021 accrued tax data provided the basis for known and measurable adjustments to the test period.

7.1_R	Interest True-Up
7.2_R	Property Tax Expense – Revised for allocation factor impact only
7.3_R	Production Tax Credit – Revised for allocation factor impact only
7.4_R	PowerTax ADIT Balance – Revised for allocation factor impact only
7.5_R	Pro Forma Tax Balances – Revised for allocation factor impact only
7.6_R	Wyoming Wind Generation Tax
7.7_R	AFUDC Equity – Revised for allocation factor impact only
7.8_R	Tax Cuts and Jobs Act EDIT Adjustment – Revised for allocation factor impact only
7.9_R	OCAT & Metro SHS Adjustment

The tax impacts of the following adjustments are included within the adjustment itself:

- Insurance Expense, Page 4.5\_R
- Repowering Buy-Downs, Page 6.4
- Coal Depreciable Life Update, Page 6.5\_R
- Bridger Mine Reclamation Costs, Page 6.6\_R
- Trapper Mine Rate Base, Page 8.2\_R
- Jim Bridger Mine Rate Base, Page 8.3\_R
- Regulatory Assets & Liabilities Amortization, Page 8.6\_R
- Pension and Other Postretirement Plan Balances Removal, Page 8.8\_R
- Remove Rolling Hills, Page 8.9\_R
- Deer Creek Mine Closure, Page 8.10\_R
- Emissions Control Investment Adjustment, Page 8.11\_R
- Transmission Project Adjustment, Page 8.12\_R
- Cholla Unit 4 Retirement, Page 8.13\_R
- Carbon Plant Closure, Page 8.16\_R
- Labor Day Wildlife Restoration, Page 8.17\_R
- Remove Merwin In-Lieu Project, Page R\_3
- Update Cross Hollows Install 2<sup>nd</sup> Xfmr - Trans Project, Page R\_4
- Remove Electric Vehicle, Page R\_5
- Capitalized Officers' Incentives Adjustment, Page R\_6

The tax impacts of the following adjustment are included within adjustment 7.4\_R and 7.5\_R:

- Pro Forma Plant Additions, Page 8.4\_R

**Pacificorp**  
**Oregon General Rate Case - December 2023**  
**Tab 7 Adjustment Summary**

	7.2_R	7.3_R	7.4_R	7.5_R	7.6_R	7.7_R
	Property Tax Expense	Production Tax Credit	PowerTax	Pro Forma Tax Balances	Wyoming Wind Generation Tax	AFUDC - Equity
Total Adjustments						
1 Operating Revenues:						
2 General Business Revenues	-	-	-	-	-	-
3 Interdepartmental	-	-	-	-	-	-
4 Special Sales	-	-	-	-	-	-
5 Other Operating Revenues	-	-	-	-	-	-
6 Total Operating Revenues	-	-	-	-	-	-
7						
8 Operating Expenses:						
9 Steam Production	-	-	-	-	-	-
10 Nuclear Production	-	-	-	-	-	-
11 Hydro Production	-	-	-	-	-	-
12 Other Power Supply	-	-	-	-	-	-
13 Transmission	-	-	-	-	-	-
14 Distribution	-	-	-	-	-	-
15 Customer Accounting	-	-	-	-	-	-
16 Customer Service & Info	-	-	-	-	-	-
17 Sales	-	-	-	-	-	-
18 Administrative & General	-	-	-	-	-	-
19						
20 Total O&M Expenses	-	-	-	-	-	-
21						
22 Depreciation	-	-	-	-	-	-
23 Amortization	-	-	-	-	-	-
24 Taxes Other Than Income	12,093,289	6,513,196	-	-	(20,944)	-
25 Income Taxes - Federal	(46,690,936)	(1,305,884)	(20,054,167)	(14,624,723)	4,199	218,219
26 Income Taxes - State	(5,777,760)	(295,747)	194	(3,312,095)	951	49,421
27 Income Taxes - Def Net	40,658,443	-	-	16,911,950	12,448,007	-
28 Investment Tax Credit Adj.	-	-	-	-	-	-
29 Misc Revenue & Expense	-	-	-	-	-	-
30						
31 Total Operating Expenses:	283,037	4,911,565	(20,053,973)	(1,024,869)	600,899	(15,794)
32						
33 Operating Rev For Return:	(283,037)	(4,911,565)	20,053,973	1,024,869	(600,899)	15,794
34						
35 Rate Base:						
36 Electric Plant In Service	-	-	-	-	-	-
37 Plant Held for Future Use	-	-	-	-	-	-
38 Misc Deferred Debits	-	-	-	-	-	-
39 Elec Plant Acq Adj	-	-	-	-	-	-
40 Nuclear Fuel	-	-	-	-	-	-
41 Prepayments	-	-	-	-	-	-
42 Fuel Stock	-	-	-	-	-	-
43 Material & Supplies	-	-	-	-	-	-
44 Working Capital	(381,628)	46,424	(189,550)	(169,539)	(149)	2,530
45 Weatherization Loans	-	-	-	-	-	-
46 Misc Rate Base	-	-	-	-	-	-
47						
48 Total Electric Plant:	(381,628)	46,424	(189,550)	(169,539)	(149)	2,530
49						
50 Rate Base Deductions:						
51 Accum Prov For Deprec	-	-	-	-	-	-
52 Accum Prov For Amort	-	-	-	-	-	-
53 Accum Def Income Tax	(50,268,963)	-	-	(42,294,236)	(1,689,723)	-
54 Unamortized ITC	4,561	-	-	-	4,561	-
55 Customer Adv For Const	-	-	-	-	-	-
56 Customer Service Deposits	-	-	-	-	-	-
57 Misc Rate Base Deductions	27,572,240	-	-	-	-	-
58						
59 Total Rate Base Deductions	(22,692,161)	-	-	(42,294,236)	(1,685,162)	-
60						
61 Total Rate Base:	(23,073,790)	46,424	(189,550)	(42,463,775)	(1,797,141)	2,530
62						
63 Return on Rate Base	0.015%	-0.122%	0.499%	0.071%	-0.013%	0.000%
64						
65 Return on Equity	0.029%	-0.234%	0.954%	0.136%	-0.025%	0.001%
66						
67 TAX CALCULATION:						
68 Operating Revenue	(12,093,289)	(6,513,196)	-	-	20,944	-
69 Other Deductions	-	-	-	-	-	-
70 Interest (AFUDC)	(1,088,618)	-	-	-	-	(1,088,618)
71 Interest	(519,598)	1,045	(4,268)	(956,240)	(40,470)	57
72 Schedule "M" Additions	(93,815,684)	-	-	(74,462,083)	(19,353,602)	-
73 Schedule "M" Deductions	28,350,317	-	-	(552,207)	28,902,524	-
74 Income Before Tax	(132,651,075)	(6,514,241)	4,268	(72,953,636)	(48,215,656)	1,088,561
75						
76 State Income Taxes	(5,777,760)	(295,747)	194	(3,312,095)	951	49,421
77 Taxable Income	(126,873,315)	(6,218,495)	4,075	(69,641,540)	19,996	1,039,140
78						
79 Federal Income Taxes + Other	(46,690,936)	(1,305,884)	(20,054,167)	(14,624,723)	4,199	218,219
APPROXIMATE PRICE CHANGE	(1,946,019)	6,744,177	(27,536,543)	(5,702,380)	642,714	367,502

**PacifiCorp**  
**Oregon General Rate Case - December 202:**  
**Tab 7 Adjustment Summary**

	7.8_R	7.9_R
	TCJA EDIT	Oregon Corporate
	Adjustment	Activity Tax & Metro SHS
1 Operating Revenues:		
2 General Business Revenues	-	-
3 Interdepartmental	-	-
4 Special Sales	-	-
5 Other Operating Revenues	-	-
6 Total Operating Revenues	-	-
7		
8 Operating Expenses:		
9 Steam Production	-	-
10 Nuclear Production	-	-
11 Hydro Production	-	-
12 Other Power Supply	-	-
13 Transmission	-	-
14 Distribution	-	-
15 Customer Accounting	-	-
16 Customer Service & Info	-	-
17 Sales	-	-
18 Administrative & General	-	-
19		
20 Total O&M Expenses	-	-
21		
22 Depreciation	-	-
23 Amortization	-	-
24 Taxes Other Than Income	-	5,601,037
25 Income Taxes - Federal	(96,092)	(1,174,372)
26 Income Taxes - State	(21,762)	(9,731)
27 Income Taxes - Def Net	11,298,487	-
28 Investment Tax Credit Adj.	-	-
29 Misc Revenue & Expense	-	-
30		
31 Total Operating Expenses:	11,180,633	4,416,934
32		
33 Operating Rev For Return:	(11,180,633)	(4,416,934)
34		
35 Rate Base:		
36 Electric Plant In Service	-	-
37 Plant Held for Future Use	-	-
38 Misc Deferred Debits	-	-
39 Elec Plant Acq Adj	-	-
40 Nuclear Fuel	-	-
41 Prepayments	-	-
42 Fuel Stock	-	-
43 Material & Supplies	-	-
44 Working Capital	(1,114)	41,749
45 Weatherization Loans	-	-
46 Misc Rate Base	-	-
47		
48 Total Electric Plant:	(1,114)	41,749
49		
50 Rate Base Deductions:		
51 Accum Prov For Deprec	-	-
52 Accum Prov For Amort	-	-
53 Accum Def Income Tax	(6,285,003)	-
54 Unamortized ITC	-	-
55 Customer Adv For Const	-	-
56 Customer Service Deposits	-	-
57 Misc Rate Base Deductions	27,572,240	-
58		
59 Total Rate Base Deductions	21,287,237	-
60		
61 Total Rate Base:	21,286,123	41,749
62		
63 Return on Rate Base	-0.302%	-0.110%
64		
65 Return on Equity	-0.579%	-0.211%
66		
67 TAX CALCULATION:		
68 Operating Revenue	-	(5,601,037)
69 Other Deductions	-	-
70 Interest (AFUDC)	-	-
71 Interest	479,341	940
72 Schedule "M" Additions	-	-
73 Schedule "M" Deductions	-	-
74 Income Before Tax	(479,341)	(5,601,977)
75		
76 State Income Taxes	(21,762)	(9,731)
77 Taxable Income	(457,579)	(5,592,246)
78		
79 Federal Income Taxes + Other	(96,092)	(1,174,372)
APPROXIMATE PRICE CHANGE	17,495,210	6,064,988



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Interest True-Up**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Interest	427	3	(17,029,840)	OR	Situs	(17,029,840)	Below
<b>Adjustment Detail:</b>			<b>Total Company</b>				
Interest June 2021 - Unadjusted			413,116,218			111,149,153	2.15
Interest December 2023 - Normalized Adjustment:			<u>359,569,015</u> (53,547,203)			<u>94,119,313</u> (17,029,840)	Below
Normalized Rate Base			16,115,377,710			4,179,558,977	2.2
Other & Non-Regulated						-	
Adjusted Rate Base			<u>16,115,377,710</u>			<u>4,179,558,977</u>	2.2
Weighted Cost of Debt			<u>2.252%</u>			<u>2.252%</u>	2.1
Normalized Interest			362,901,514			94,119,313	2.15

**Description of Adjustment:**

This adjustment synchronizes interest expense with the jurisdictional allocated rate base. This is calculated by multiplying net rate base by the Company's weighted cost of debt. A separate column is not shown for adjustment 7.1 on page 7.0.2 as the interest true-up component is calculated and shown on the adjustment summary pages for each of the adjustments individually.

*This adjustment has been updated to synchronize interest expense with recalculated rate base reflective of corrections and modifications as a result of updating revenue requirement calculation in Reply.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Property Tax Expense**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Tax:</b>							
Taxes Other Than Income	408	3	24,011,597	GPS	27.125%	6,513,196	7.2.1

**Description of Adjustment:**

This adjustment normalizes the difference between actual accrued property tax expense and forecasted property tax expense resulting from estimated capital additions.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Production Tax Credit**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Tax:</b>							
Adj to Pro Forma PTC	40910	3	(77,129,477)	SG	26.002%	(20,055,022)	7.3.1

**Description of Adjustment:**

The Company is entitled to recognize a federal income tax credit as a result of placing renewable generating plants in service. The tax credit is based on the kilowatt-hours generated by a qualified facility during the facility's first ten years of service. This adjustment removes the base period Renewable Energy Tax credits and adds in the pro forma period Renewable Energy Tax credits which are reflected in the Company's Transition Adjustment Mechanism filings annually.

As described in the testimony of Ms. Sherona L. Cheung, this adjustment is included in the calculation of overall revenue requirement for computational purposes only; the Company is not requesting recovery of NPC and PTCs as part of the general rate case. NPC and PTCs are reflected in the Company's Transition Adjustment Mechanism filings annually.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**PowerTax**

	ACCOUNT	Type	TOTAL COMPANY	FACTOR	FACTOR %	OREGON ALLOCATED	REF#
<b>Adjustment to Tax:</b>							
Accelerated Pollution Control Facilities	281	3	148,004,159	SG	26.002%	38,483,688	
Accumulated Deferred Income Taxes - YE	282	3	2,745,860,351	DITBAL	24.503%	672,825,414	
California	282	3	(67,305,536)	CA	Situs	-	
Idaho	282	3	(181,930,228)	ID	Situs	-	
Oregon	282	3	(753,603,338)	OR	Situs	(753,603,338)	
Other	282	3	(62,185,819)	OTHER	0.000%	-	
Utah	282	3	(1,372,605,502)	UT	Situs	-	
Washington	282	3	(189,228,486)	WA	Situs	-	
Wyoming	282	3	(448,663,332)	WYP	Situs	-	
			<u>(181,657,732)</u>			<u>(42,294,236)</u>	7.4.1
Schedule M Adjustment	SCHMAP	3	(20,640)	SCHMDEXP	22.600%	(4,665)	7.4.1
Schedule M Adjustment	SCHMAT	3	311,609,727	SCHMDEXP	22.600%	70,424,561	7.4.1
Schedule M Adjustment	SCHMAT	3	(225,430,833)	UT	Situs	-	7.4.1
Schedule M Adjustment	SCHMAT	3	(131,758,074)	OR	Situs	(131,758,074)	7.4.1
Schedule M Adjustment	SCHMAT	3	(16,938,208)	ID	Situs	-	7.4.1
Schedule M Adjustment	SCHMAT	3	(5,431,664)	SO	27.125%	(1,473,350)	7.4.1
Schedule M Adjustment	SCHMAT	3	(36,274,387)	CIAC	26.473%	(9,602,772)	7.4.1
Schedule M Adjustment	SCHMAT	3	(3,813,773)	SNPD	26.473%	(1,009,605)	7.4.1
Schedule M Adjustment	SCHMAT	3	(1,353,789)	SNP	25.549%	(345,875)	7.4.1
Schedule M Adjustment	SCHMAT	3	(2,662,525)	SG	26.002%	(692,303)	7.4.1
Schedule M Adjustment	SCHMDT	3	158,252,176	TAXDEPR	26.410%	41,793,916	7.4.1
Schedule M Adjustment	SCHMDT	3	(7,807,154)	SO	27.125%	(2,117,707)	7.4.1
Schedule M Adjustment	SCHMDT	3	2,582,634	SG	26.002%	671,530	7.4.1
Schedule M Adjustment	SCHMDT	3	507,694	SNP	25.549%	129,709	7.4.1
Schedule M Adjustment	SCHMDT	3	(151,260,232)	GPS	27.125%	(41,029,655)	7.4.1
Deferred Income Tax Expense	41110	3	(76,614,237)	SCHMDEXP	22.600%	(17,315,005)	7.4.1
Deferred Income Tax Expense	41110	3	55,425,777	UT	Situs	-	7.4.1
Deferred Income Tax Expense	41110	3	32,394,831	OR	Situs	32,394,831	7.4.1
Deferred Income Tax Expense	41110	3	4,164,529	ID	Situs	-	7.4.1
DIT Expense - Flowthrough	41110	3	(1,258,830)	OR	Situs	(1,258,830)	7.4.1
Deferred Income Tax Expense	41110	3	1,335,462	SO	27.125%	362,247	7.4.1
Deferred Income Tax Expense	41110	3	8,918,638	CIAC	26.473%	2,360,995	7.4.1
Deferred Income Tax Expense	41110	3	937,677	SNPD	26.473%	248,227	7.4.1
Deferred Income Tax Expense	41110	3	332,851	SNP	25.549%	85,039	7.4.1
Deferred Income Tax Expense	41110	3	654,624	SG	26.002%	170,214	7.4.1
Deferred Income Tax Expense	41010	3	38,908,830	TAXDEPR	26.410%	10,275,703	7.4.1
Deferred Income Tax Expense	41010	3	(1,919,514)	SO	27.125%	(520,672)	7.4.1
Deferred Income Tax Expense	41010	3	634,982	SG	26.002%	165,107	7.4.1
Deferred Income Tax Expense	41010	3	124,825	SNP	25.549%	31,891	7.4.1
Deferred Income Tax Expense	41010	3	(37,189,748)	GPS	27.125%	(10,087,797)	7.4.1

**Description of Adjustment:**

This adjustment reflects the accumulated deferred income tax balances for property on a jurisdictional basis as maintained in the PowerTax System for the 12 months ended December 31, 2022. Updates the related tax depreciation and book depreciation schedule m items and associated deferred income tax expense for the 12 months ended December 31, 2022.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Pro Forma Tax Balances**

PAGE 7.5\_R

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>	
<b>Adjustment to Tax:</b>								
Schedule M Adjustment Permanent	SCHMAP	3	(10,558)	SE	24.920%	(2,631)		
	SCHMAP	3	(450,502)	SO	27.125%	(122,200)		
	SCHMDP	3	(5,308,942)	SE	24.920%	(1,322,996)		
	SCHMDP	3	(2,060)	SNP	25.549%	(526)		
Schedule M Adjustment Temporary	SCHMAT	3	(3,553,889)	BADDEBT	48.436%	(1,721,348)		
	SCHMAT	3	(186,149)	CA	Situs	-		
	SCHMAT	3	4,929,707	GPS	27.125%	1,337,193		
	SCHMAT	3	(257,254)	ID	Situs	-		
	SCHMAT	3	(9,433,030)	OR	Situs	(9,433,030)		
	SCHMAT	3	227,964,433	OTHER	0.000%	-		
	SCHMAT	3	(20,056,679)	SE	24.920%	(4,998,152)		
	SCHMAT	3	(170,296)	SG	26.002%	(44,280)		
	SCHMAT	3	(582,468)	SNP	25.549%	(148,812)		
	SCHMAT	3	(15,602,237)	SO	27.125%	(4,232,139)		
	SCHMAT	3	45,715	TROJD	25.808%	11,798		
	SCHMAT	3	(23,121,853)	UT	Situs	-		
	SCHMAT	3	(15,474,052)	WA	Situs	-		
	SCHMAT	3	42,483	WYP	Situs	-		
		SCHMDT	3	317,074	CA	Situs	-	
		SCHMDT	3	(9,002,811)	ID	Situs	-	
		SCHMDT	3	(508,375)	OR	Situs	(508,375)	
		SCHMDT	3	(43,505,410)	OTHER	0.000%	-	
		SCHMDT	3	4,563,366	SE	24.920%	1,137,197	
		SCHMDT	3	(856,231)	SG	26.002%	(222,635)	
		SCHMDT	3	(969,539)	SNPD	26.473%	(256,662)	
		SCHMDT	3	110,880,326	SO	27.125%	30,076,521	
		SCHMDT	3	22,934,894	UT	Situs	-	
		SCHMDT	3	(249,911)	WA	Situs	-	
		SCHMDT	3	4,802,347	WYP	Situs	-	
	Current Federal Tax Credits	40910	3	28,220	SE	24.920%	7,032	
		40910	3	1,659	SO	27.125%	450	
State Income Tax	40911	3	10,953,263	OTHER	0.000%	-		

**Description of Adjustment:**

This adjustment normalizes the Base period Schedule M to an estimated proforma level of expense for the CY December 2023 Test period.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
(cont.) Pro Forma Tax Balances

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Tax:</b>							
Deferred Tax Expense Debit	41010	3	77,958	CA	Situs	-	
	41010	3	(2,213,484)	ID	Situs	-	
	41010	3	(124,992)	OR	Situs	(124,992)	
	41010	3	(10,696,500)	OTHER	0.000%	-	
	41010	3	1,121,977	SE	24.920%	279,598	
	41010	3	(210,518)	SG	26.002%	(54,738)	
	41010	3	(238,377)	SNPD	26.473%	(63,105)	
	41010	3	27,261,704	SO	27.125%	7,394,794	
	41010	3	5,638,911	UT	Situs	-	
	41010	3	(61,445)	WA	Situs	-	
	41010	3	1,180,733	WYP	Situs	-	
Deferred Tax Expense Credit	41110	3	873,780	BADDEBT	48.436%	423,221	
	41110	3	45,768	CA	Situs	-	
	41110	3	63,250	ID	Situs	-	
	41110	3	-	FERC	0.000%	-	
	41110	3	(1,212,047)	GPS	27.125%	(328,770)	
	41110	3	2,319,262	OR	Situs	2,319,262	
	41110	3	(57,946,167)	OTHER	0.000%	-	
	41110	3	4,931,256	SE	24.920%	1,228,876	
	41110	3	1,152,362	SG	26.002%	299,635	
	41110	3	143,209	SNP	25.549%	36,588	
	41110	3	3,836,059	SO	27.125%	1,040,539	
	41110	3	(11,240)	TROJD	25.808%	(2,901)	
	41110	3	5,684,878	UT	Situs	-	
	41110	3	3,804,544	WA	Situs	-	
	41110	3	(10,445)	WYP	Situs	-	
	41110	3	-	WYU	Situs	-	
ITC Amortization	41140	3	647,635	DGU	0.000%	-	

**Description of Adjustment:**

This adjustment normalizes the Base period Deferred Income Tax Expense to a pro forma level of expense for the CY December 2023 Test period.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
(cont.) Pro Forma Tax Balances

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Tax:</b>							
ADIT Balance 190	190	3	287,036	BADDEBT	48.436%	139,028	
	190	3	46,121	CA	Situs	-	
	190	3	(39,314)	ID	Situs	-	
	190	3	(142,097)	OR	Situs	(142,097)	
	190	3	(5,454,037)	OTHER	0.000%	-	
	190	3	(943,514)	SE	24.920%	(235,125)	
	190	3	(577,551)	SG	26.002%	(150,173)	
	190	3	(16,485,532)	SO	27.125%	(4,471,735)	
	190	3	(9,977)	TROJD	25.808%	(2,575)	
	190	3	(1,152,438)	UT	Situs	-	
	190	3	(7,466,690)	WA	Situs	-	
	190	3	6,492	WYP	Situs	-	
	190	3	855,199	SNPD	26.473%	226,393	
ADIT Balance 282	282	3	(8,598,628)	OTHER	0.000%	-	
	282	3	(78,185)	SE	24.920%	(19,484)	
	282	3	(11,946)	SO	27.125%	(3,240)	
	282	3	77,911	SNP	25.549%	19,905	
	282	3	1,048,227	UT	Situs	-	
	282	3	348,444	WYP	Situs	-	
ADIT Balance 283	283	3	769,352	CA	Situs	-	
	283	3	(36,304)	GPS	27.125%	(9,848)	
	283	3	(583,741)	ID	Situs	-	
	283	3	325,163	OR	Situs	325,163	
	283	3	(6,901,536)	OTHER	0.000%	-	
	283	3	515,387	SE	24.920%	128,435	
	283	3	(269,601)	SG	26.002%	(70,101)	
	283	3	70,997	SNP	25.549%	18,139	
	283	3	9,428,836	SO	27.125%	2,557,592	
	283	3	360,210	UT	Situs	-	
	283	3	(57,404)	WA	Situs	-	
	283	3	3,362,655	WYP	Situs	-	
	283	3	13,442	WYU	Situs	-	
ADIT Balance 255	255	3	(118,720)	UT	Situs	-	
	255	3	17,542	SG	26.002%	4,561	
	255	3	7,225	ID	Situs	-	

**Description of Adjustment:**

This adjustment normalizes the Base period Accumulated Deferred Income Tax Balances to an proforma level of a thirteen-month average rate base balance for the CY December 2023 Test period.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp  
Oregon General Rate Case - December 2023  
Wyoming Wind Generation Tax**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b> <i>Taxes Other Than Income</i>	408	3	(80,548)	SG	26.002%	(20,944)	7.6.1_R

**Description of Adjustment:**

This adjustment normalizes into the test year results the Wyoming Wind Generation Tax that becomes effective January 1, 2012. The Wyoming Wind Generation Tax is an excise tax levied upon the privilege of producing electricity from wind resources in the state of Wyoming. The tax is on the production of any electricity produced from wind resources for sale or trade on or after January 1, 2012, and is to be paid by the person producing the electricity. The tax is one dollar on each megawatt hour of electricity produced from wind resources at the point of interconnection with an electric transmission line.

*This adjustment has been updated in reply to include a phased calculation for the Wyoming Wind Generation Tax for Ekola Flats and TB Flats based on the staggered in-service dates for the various turbines, as reflected in the Company's response to OPUC data request 308.*



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Wyoming Wind Generation Tax**  
**Oregon**

<b>Wind Plant</b>	<b>2023 NPC MWH Production (b)</b>	<b>Tax Begins</b>	<b>2023 \$/MWH Tax</b>
Foot Creek (a)	-	3/24/2024	-
Glenrock I Wind Plant	369,733	1/1/2012	369,733
Glenrock III Wind Plant	136,868	1/1/2012	136,868
Seven Mile Hill Wind Plant	417,048	1/1/2012	417,048
Seven Mile Hill II Wind Plant	87,428	1/1/2012	87,428
Rolling Hills Wind Plant	-	1/17/2012	-
High Plains Wind Plant	382,404	9/1/2012	382,404
McFadden Ridge	116,545	9/1/2012	116,545
Dunlap	476,749	10/1/2013	476,749
Cedar Springs Wind II (a)	77,411	12/4/2023	77,411
Ekola Flats Wind (a)	45,884	Various	45,884
TB Flats Wind (a)	37,424	Various	37,424
TB Flats Wind II (a)	4,307	Various	4,307
<b>Total WY Wind MWH</b>	<b><u>2,151,802</u></b>		<b><u>2,151,801</u></b>

June 2021 Base Period

2,232,349

ProForma Adjustment - December 2023

(80,548) **Ref 7.6\_R**

(a) Electricity produced from a wind turbine shall not be subject to the tax imposed under this chapter until the date three (3) years after the turbine first produced electricity for sale. After such date the production shall be subject to the tax, as provided by W.S. 39-22-103, regardless of whether production first commenced prior to or after January 1, 2012.

(b) WY Wind Generation tax is based on total MWh production, not PTC eligible generation. Glenrock I, Rolling Hills and Glenrock III were not fully repowered, which results in a difference between PTC eligible generation and WY Wind tax eligible generation. Rolling Hills is not included in this calculation because Oregon does not include Rolling Hills in rates.

PacifiCorp  
Oregon General Rate Case - December 2023  
AFUDC - Equity

PAGE 7.7\_R

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b> AFUDC - Equity	419	1	(4,260,964)	SNP	25.549%	(1,088,618)	7.7.1

**Description of Adjustment:**

This adjustment brings in the appropriate level of AFUDC - Equity into results to align the tax Schedule M with regulatory income.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**TCJA EDIT Adjustment**

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	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustments to Rate Base:</b>							
Reg Liab - Protected PP&E EDIT - OR	254	1	27,572,240	OR	Situs	27,572,240	
<b>Adjustments to Tax:</b>							
DTA - Reg Liab - Protected PP&E EDIT - OR	190	1	(6,779,076)	OR	Situs	(6,779,076)	
DTL PMI PP&E - Protected Property EDIT	282	1	1,982,626	SE	24.920%	494,073	
Protected PP&E RSGM Amortization - OR	41110	1	11,298,487	OR	Situs	11,298,487	

**Description of Adjustment:**

This adjustment reflects the level of protected property EDIT amortization and adjusts the rate base for the test period. This adjustment also reflects an adjustment to RSGM amortization to reflect the incremental coal lives adjustment proposed in the current GRC.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Oregon Corporate Activity Tax

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
<i>Oregon Corporate Activity Tax</i>	408	3	5,601,037	OR	Situs	5,601,037	7.9.1
Metro Business Income Tax	40911	3	244,599	OR	Situs	244,599	7.9.2

**Description of Adjustment:**

This adjustment is to include the Oregon Corporate Activity Tax and Metro Business Income Tax in base rates effective January 1, 2023.

*This adjustment has been updated in reply to move the OCAT expense from FERC Account 40911 to FERC Account 408.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Oregon Corporate Activity Tax**

		<b>OR CAT</b>	
Jun-21	12 months	Oregon Corporate Activity Tax - Base Period	-
Dec-23	12 months	Oregon Corporate Activity Tax - 2023 Forecast	5,601,037
		Total	<u>5,601,037</u>
Adjustment to Account 408			<u>5,601,037</u> Ref. 7.9_R

Tab \* - DSfV1SeW

**PacifiCorp**  
**Oregon General Rate Case – December 2023**  
**Rate Base Adjustment Index**

The Company used year-end rate base as of June 2021 as the starting point for establishing the adjustments made to the test period. Test period electric plant in service is reflected using December 2020 ending balances. Other rate base components are reflected using a December 2023 13 month average balance. The following rate base adjustments are included.

- 8.1\_R Cash Working Capital
- 8.2\_R Trapper Mine Rate Base – Revised for allocation factor impact only
- 8.3\_R Jim Bridger Mine Rate Base – Revised for allocation factor impact only
- 8.4\_R Pro Forma Plant Additions – Revised for allocation factor impact only
- 8.5\_R Customer Advances for Construction – Revised for allocation factor impact only
- 8.6\_R Regulatory Assets & Liabilities Amortization
- 8.7\_R FERC 105 (PHFU) Adjustment – Revised for allocation factor impact only
- 8.8\_R Pension Asset – Revised for allocation factor impact only
- 8.9\_R Remove Rolling Hills – Revised for allocation factor impact only
- 8.10\_R Deer Creek Mine Adjustment – Revised for allocation factor impact only
- 8.11\_R Emissions Control Investment Adjustment – Revised for allocation factor impact only
- 8.12\_R Transmission Project Adjustment – Revised for allocation factor impact only
- 8.13\_R Cholla Unit 4 Retirement
- 8.14\_R Wind Project Deferrals Amortization
- 8.15\_R Miscellaneous Rate Base
- 8.16\_R Carbon Plant Closure – Revised for allocation factor impact only
- 8.17\_R Labor Day Wildfire Restoration – Revised for allocation factor impact only





**Pacificorp**  
**Oregon General Rate Case - December 202:**  
**Tab 8 Adjustment Summary**

	8.8_R	8.9_R	8.10_R	8.11_R	8.12_R	8.13_R	8.14_R
	Pension Asset	Remove Rolling Hills	Deer Creek Mine Adjustment	Emissions Control Investment Adjustment	Transmission Project Adjustment	Cholla Unit 4 Retirement	Wind Project Deferrals Amortization
1 Operating Revenues:							
2 General Business Revenues	-	-	-	-	-	-	-
3 Interdepartmental	-	-	-	-	-	-	-
4 Special Sales	-	-	-	-	-	-	-
5 Other Operating Revenues	-	-	-	-	-	-	-
6 Total Operating Revenues	-	-	-	-	-	-	-
7							
8 Operating Expenses:							
9 Steam Production	-	-	(9,199,271)	-	-	(3,808,804)	-
10 Nuclear Production	-	-	-	-	-	-	-
11 Hydro Production	-	-	-	-	-	-	-
12 Other Power Supply	-	(296,695)	-	-	-	-	-
13 Transmission	-	-	-	-	-	-	-
14 Distribution	-	-	-	-	-	-	-
15 Customer Accounting	-	-	-	-	-	-	-
16 Customer Service & Info	-	-	-	-	-	-	-
17 Sales	-	-	-	-	-	-	-
18 Administrative & General	-	(117,052)	804,809	(1,669,716)	-	-	-
19							
20 Total O&M Expenses	-	(413,747)	(8,394,462)	(1,669,716)	-	(3,808,804)	-
21							
22 Depreciation	-	-	-	(84,539)	-	-	-
23 Amortization	-	-	-	-	-	243,853	-
24 Taxes Other Than Income	-	-	-	-	-	299,058	-
25 Income Taxes - Federal	334,315	850,259	837,651	346,012	644	585,606	-
26 Income Taxes - State	75,713	192,560	189,705	78,362	146	132,623	-
27 Income Taxes - Def Net	-	(707,110)	1,094,535	12,551	-	92,535	-
28 Investment Tax Credit Adj.	-	-	-	-	-	-	-
29 Misc Revenue & Expense	-	-	-	-	-	-	-
30							
31 Total Operating Expenses:	410,028	(78,038)	(6,272,572)	(1,317,331)	789	(2,455,129)	-
32							
33 Operating Rev For Return:	(410,028)	78,038	6,272,572	1,317,331	(789)	2,455,129	-
34							
35 Rate Base:							
36 Electric Plant In Service	-	(50,739,591)	-	(1,209,067)	(181,837)	-	-
37 Plant Held for Future Use	-	-	-	-	-	-	-
38 Misc Deferred Debits	(110,350,136)	-	(10,893,215)	-	-	310,382	-
39 Elec Plant Acq Adj	-	-	-	-	-	-	-
40 Nuclear Fuel	(7,773,234)	-	-	-	-	-	-
41 Prepayments	-	-	-	-	-	-	-
42 Fuel Stock	-	-	-	-	-	-	-
43 Material & Supplies	-	-	-	-	-	(1,388,987)	-
44 Working Capital	3,876	5,946	(69,634)	(11,771)	7	(26,385)	-
45 Weatherization Loans	-	-	-	-	-	-	-
46 Misc Rate Base	-	-	-	-	-	-	-
47							
48 Total Electric Plant:	(118,119,494)	(50,733,645)	(10,962,849)	(1,220,838)	(181,829)	(1,104,990)	-
49							
50 Rate Base Deductions:							
51 Accum Prov For Deprec	-	(4,649,521)	-	84,539	28,499	-	-
52 Accum Prov For Amort	-	-	-	-	-	-	-
53 Accum Def Income Tax	23,872,504	13,118,713	491,224	122,493	10,751	(302,378)	-
54 Unamortized ITC	-	-	-	-	-	-	-
55 Customer Adv For Const	-	-	-	-	-	-	-
56 Customer Service Deposits	-	-	-	-	-	-	-
57 Misc Rate Base Deductions	20,189,927	-	-	-	-	-	-
58							
59 Total Rate Base Deductions	44,062,431	8,469,192	491,224	207,032	39,250	(302,378)	-
60							
61 Total Rate Base:	(74,057,063)	(42,264,453)	(10,471,625)	(1,013,805)	(142,579)	(1,407,368)	-
62							
63 Return on Rate Base	0.054%	0.039%	0.156%	0.032%	0.000%	0.059%	0.000%
64							
65 Return on Equity	0.103%	0.074%	0.299%	0.061%	0.000%	0.113%	0.000%
66							
67 TAX CALCULATION:							
68 Operating Revenue	-	413,747	8,394,462	1,754,256	-	3,265,893	-
69 Other Deductions	-	-	-	-	-	-	-
70 Interest (AFUDC)	-	-	-	-	-	-	-
71 Interest	(1,667,688)	(951,751)	(235,810)	(22,830)	(3,211)	(31,692)	-
72 Schedule "M" Additions	-	19	(5,513,356)	(84,540)	-	(376,364)	-
73 Schedule "M" Deductions	-	(2,875,895)	(1,061,601)	(33,492)	-	-	-
74 Income Before Tax	1,667,688	4,241,413	4,178,518	1,726,038	3,211	2,921,222	-
75							
76 State Income Taxes	75,713	192,560	189,705	78,362	146	132,623	-
77 Taxable Income	1,591,975	4,048,853	3,988,813	1,647,676	3,065	2,788,599	-
78							
79 Federal Income Taxes + Other	334,315	850,259	837,651	346,012	644	585,606	-
APPROXIMATE PRICE CHANGE	(6,929,781)	(4,383,006)	(9,666,427)	(1,910,163)	(13,342)	(3,511,227)	-

**PacifiCorp**  
**Oregon General Rate Case - December 202:**  
**Tab 8 Adjustment Summary**

	8.15_R	8.16_R	8.17_R
	Miscellaneous Rate Base	Carbon Plant Closure	Remove Labor Day Wildfire Restoration
1 Operating Revenues:			
2 General Business Revenues	-	-	-
3 Interdepartmental	-	-	-
4 Special Sales	-	-	-
5 Other Operating Revenues	-	-	-
6 Total Operating Revenues	-	-	-
7			
8 Operating Expenses:			
9 Steam Production	-	-	-
10 Nuclear Production	-	-	-
11 Hydro Production	-	-	-
12 Other Power Supply	-	-	-
13 Transmission	-	-	-
14 Distribution	-	-	-
15 Customer Accounting	-	-	-
16 Customer Service & Info	-	-	-
17 Sales	-	-	-
18 Administrative & General	-	-	-
19			
20 Total O&M Expenses	-	-	-
21			
22 Depreciation	-	(3,000,357)	-
23 Amortization	-	(1,705,494)	-
24 Taxes Other Than Income	-	-	-
25 Income Taxes - Federal	78,520	618,300	1,310,097
26 Income Taxes - State	17,783	140,028	296,701
27 Income Taxes - Def Net	-	419,323	(1,265,421)
28 Investment Tax Credit Adj.	-	-	-
29 Misc Revenue & Expense	-	-	-
30			
31 Total Operating Expenses:	96,302	(3,528,200)	341,377
32			
33 Operating Rev For Return:	(96,302)	3,528,200	(341,377)
34			
35 Rate Base:			
36 Electric Plant In Service	-	-	(63,913,056)
37 Plant Held for Future Use	-	-	-
38 Misc Deferred Debits	(4,407,042)	(806,971)	-
39 Elec Plant Acq Adj	-	-	-
40 Nuclear Fuel	-	-	-
41 Prepayments	-	-	-
42 Fuel Stock	(12,987,477)	-	-
43 Material & Supplies	-	-	-
44 Working Capital	910	7,168	15,187
45 Weatherization Loans	-	-	-
46 Misc Rate Base	-	-	-
47			
48 Total Electric Plant:	(17,393,609)	(799,804)	(63,897,869)
49			
50 Rate Base Deductions:			
51 Accum Prov For Deprec	-	-	801,831
52 Accum Prov For Amort	-	-	-
53 Accum Def Income Tax	-	1,110,875	1,438,305
54 Unamortized ITC	-	-	-
55 Customer Adv For Const	-	-	-
56 Customer Service Deposits	-	-	-
57 Misc Rate Base Deductions	-	(4,039,377)	-
58			
59 Total Rate Base Deductions	-	(2,928,502)	2,240,136
60			
61 Total Rate Base:	(17,393,609)	(3,728,306)	(61,657,732)
62			
63 Return on Rate Base	0.014%	0.087%	0.053%
64			
65 Return on Equity	0.027%	0.166%	0.101%
66			
67 TAX CALCULATION:			
68 Operating Revenue	-	4,705,852	-
69 Other Deductions	-	-	-
70 Interest (AFUDC)	-	-	-
71 Interest	(391,686)	(83,958)	(1,388,468)
72 Schedule "M" Additions	-	-	-
73 Schedule "M" Deductions	-	1,705,494	(5,146,792)
74 Income Before Tax	391,686	3,084,315	6,535,260
75			
76 State Income Taxes	17,783	140,028	296,701
77 Taxable Income	373,903	2,944,287	6,238,559
78			
79 Federal Income Taxes + Other	78,520	618,300	1,310,097
APPROXIMATE PRICE CHANGE	(1,627,581)	(5,218,470)	(5,769,532)

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Cash Working Capital**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Cash Working Capital	CWC	3	198,617	OR	Situs	198,617	Below
<b>Adjustment Detail:</b>							
Cash Working Capital June 2021 - Unadjusted			30,372,003			8,566,801	2.28
Cash Working Capital December 2023 - Normalized			<u>30,861,836</u>			<u>8,765,418</u>	2.28
Adjustment:			489,833			<u>198,617</u>	

**Description of Adjustment:**

This adjustment is necessary to compute the cash working capital for the normalized results of operations in this filing. Cash working capital is calculated by taking total operation and maintenance expense allocated to the jurisdiction and adding its share of allocated taxes, including state and federal income taxes and taxes other than income. This total is divided by the number of days in the year to determine the Company's average daily cost of service. The daily cost of service is multiplied by net lag days to produce the adjusted cash working capital balance. Net lag days for Oregon are calculated using the Company's 2015 lead lag study. A separate column is not shown for adjustment 8.1 on page 8.0.2 as the cash working capital component is calculated and shown on the adjustment summary pages for each of the adjustments individually.

*This adjustment has been modified for Cash Working Capital impacts as a result of corrections and updates to adjustments made in Reply.*

**PacifiCorp**  
**Update Cash Working Capital**  
**Twelve Months Ending December 31, 2023**

	Total	California	Oregon	Washington	Wyoming	Wy-PPL	Utah	Idaho	Wy-UPL	FERC
Lead/Lag Study as of 12/15										
Revenue Lag Days	41.52	41.17	40.25	41.27	37.72	37.72	40.88	37.54	37.72	35.62
Expense Lag Days	35.72	40.25	36.80	35.20	36.83	36.83	36.81	36.86	36.83	35.10
Net Lag Days	5.80	0.92	3.45	6.07	0.89	0.89	4.07	0.68	0.89	0.53
O&M Expense	3,395,175,262	61,468,227	909,978,769	241,335,947	445,553,442	370,686,849	1,421,243,151	197,390,521	74,866,593	870,397
Taxes Other than Income	240,472,853	5,655,128	89,848,715	15,516,889	28,526,935	23,956,796	89,084,185	11,799,208	4,570,139	41,791
Federal Income Tax	(196,760,593)	(925,231)	(69,043,545)	(11,338,479)	(37,782,173)	(28,793,394)	(49,574,955)	(7,299,175)	(8,988,779)	2,200,029
State Income Tax	17,921,046	463,432	(3,423,104)	1,027,540	(2,047,693)	(1,127,527)	9,256,476	1,101,240	(920,167)	511,664
Total	3,456,808,567	66,661,557	927,360,836	246,541,896	434,250,511	364,722,724	1,470,008,858	202,991,794	69,527,787	3,623,880
Divided by Days in Year	365	365	365	365	365	365	365	365	365	365
Avg. Daily Cost of Service	9,470,708	182,634	2,540,715	675,457	1,189,727	999,240	4,027,422	556,142	190,487	9,928
Net Lag Days	5.80	0.92	3.45	6.07	0.89	0.89	4.07	0.68	0.89	0.53
Cash Working Capital	<b>30,861,836</b>	<b>167,878</b>	<b>8,765,418</b>	<b>4,100,026</b>	<b>1,057,783</b>	<b>888,421</b>	<b>16,385,087</b>	<b>380,389</b>	<b>169,361</b>	<b>5,254</b>
	<b>Ref. 2.28</b>									

**PacifiCorp  
Oregon General Rate Case - December 2023  
Trapper Mine Rate Base**

PAGE 8.2\_R

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Other Tangible Property	399	1	9,334,515	SE	24.920%	2,326,174	Below
Other Tangible Property	399	3	<u>(1,177,299)</u>	SE	24.920%	<u>(293,385)</u>	Below
			<u>8,157,216</u>			<u>2,032,790</u>	Below
Final Reclamation Liability	2533	3	(2,153,378)	SE	24.920%	(536,625)	Below
<b>Adjustment to Tax:</b>							
Schedule M Adj - Reclamation Liab	SCHMAT	3	1,544,661	SE	24.920%	384,932	8.2.2
Deferred Income Tax Expense	41110	3	(379,780)	SE	24.920%	(94,642)	8.2.2
Accumulated Def Inc Tax Balance	190	3	394,020	SE	24.920%	98,190	8.2.2
<b>Adjustment Detail</b>							
<u>Other Tangible Property</u>							
			9,334,515				8.2.1
			<u>8,157,216</u>				8.2.1
			<u>(1,177,299)</u>				Above
<u>Final Reclamation Liability</u>							
			(7,150,412)				8.2.2
			<u>(9,303,790)</u>				8.2.2
			<u>(2,153,378)</u>				Above

**Description of Adjustment:**

The Company owns a 29.14% interest in the Trapper Mine, which provides coal to the Craig generating plant. The normalized coal cost of Trapper includes all operating and maintenance costs, but it does not include a return on investment. This adjustment adds the Company's portion of the Trapper Mine plant investment to the rate base. This adjustment reflects net plant to recognize the depreciation of the investment over time. This adjustment also walks forward the Reclamation Liability to December 2022. The adjustment was stipulated to and approved in Oregon UE 111, and it has been included in all filings since.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Jim Bridger Mine Rate Base**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Other Tangible Property	399	1	70,453,393	SE	24.920%	17,557,084	Below
Other Tangible Property	399	3	(29,691,808)	SE	24.920%	(7,399,240)	Below
			<u>40,761,585</u>			<u>10,157,844</u>	
<b>Adjustment to Tax:</b>							
Accumulated Def Inc Tax Balance	190	3	(566,792)	SE	24.920%	(141,245)	8.3.2
<b>Adjustment Detail</b>							
June 2021 End of Period Balance			70,453,393				8.3.1
December 2022 End of Period Balance			40,761,585				8.3.1
Adjustment to December 2022 Balance			<u>(29,691,808)</u>				

**Description of Adjustment:**

The Company owns a two-thirds interest in the Bridger Coal Company (BCC), which supplies coal to the Jim Bridger generating plant. The Company's investment in BCC is recorded on the books of Pacific Minerals, INC (PMI), a wholly-owned subsidiary. Because of this ownership arrangement, the coal mine investment is not included in Account 101 - Electric Plant in Service. The normalized costs for BCC provides no return on investment. The return on investment for BCC is removed in the fuels credit which the Company has included as an offset to fuel prices leaving no return in results. The Bridger Mine adjustment was stipulated to and approved in Oregon UE 111, and has been included in all filings since.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Pro Forma Plant Additions

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Steam Plant	312	3	(7,415,427)	SG	26.002%	(1,928,142)	
Steam Plant	312	3	(9,693,976)	SG	26.002%	(2,520,605)	
Steam Plant	312	3	83,311,329	SG	26.002%	21,662,413	
Steam Plant	312	3	-	SG	26.002%	-	
Hydro Plant	332	3	(29,867,468)	SG-P	26.002%	(7,766,068)	
Hydro Plant	332	3	(591,603)	SG-U	26.002%	(153,827)	
Hydro Plant	332	3	113,051,749	SG-P	26.002%	29,395,446	
Hydro Plant	332	3	30,389,979	SG-U	26.002%	7,901,930	
Other Plant	343	3	-	SG	26.002%	-	
Other Plant	343	3	30,157,070	SG	26.002%	7,841,369	
Other Plant	343	3	315,315	OR	Situs	315,315	
Other Plant	343	3	85,575,852	SG-W	26.002%	22,251,229	
Other Plant	343	3	3,947,715	SG	26.002%	1,026,475	
Transmission Plant	355	3	(3,027,279)	SG	26.002%	(787,146)	
Transmission Plant	355	3	(5,318,454)	SG	26.002%	(1,382,892)	
Transmission Plant	355	3	406,279,047	SG	26.002%	105,639,707	
Distribution Plant	360	3	5,894,163	OR	Situs	1,387,103	
Distribution Plant	361	3	11,172,975	OR	Situs	2,629,393	
Distribution Plant	362	3	92,706,497	OR	Situs	21,817,091	
Distribution Plant	364	3	121,157,198	OR	Situs	28,512,538	
Distribution Plant	365	3	76,239,951	OR	Situs	17,941,935	
Distribution Plant	366	3	37,825,102	OR	Situs	8,901,573	
Distribution Plant	367	3	88,238,304	OR	Situs	20,765,568	
Distribution Plant	368	3	133,563,546	OR	Situs	31,432,188	
Distribution Plant	369	3	82,592,480	OR	Situs	19,436,908	
Distribution Plant	370	3	22,608,398	OR	Situs	5,320,549	
Distribution Plant	371	3	781,680	OR	Situs	183,957	
Distribution Plant	373	3	5,598,039	OR	Situs	1,317,415	
General Plant	397	3	849,714	CA	Situs	-	
General Plant	397	3	19,428,697	OR	Situs	19,428,697	
General Plant	397	3	808,867	WA	Situs	-	
General Plant	397	3	7,938,874	WYP	Situs	-	
General Plant	397	3	39,988,273	UT	Situs	-	
General Plant	397	3	3,497,677	ID	Situs	-	
General Plant	397	3	(570,735)	WYU	Situs	-	
General Plant	397	3	(250,510)	SG	26.002%	(65,137)	
General Plant	397	3	(554,012)	SG	26.002%	(144,053)	
General Plant	397	3	9,280,356	SG	26.002%	2,413,056	
General Plant	397	3	55,872,042	SO	27.125%	15,155,409	
General Plant	397	3	-	SG	26.002%	-	
General Plant	397	3	-	SG	26.002%	-	
General Plant	397	3	(1,789,712)	CN	30.990%	(554,630)	
General Plant	397	3	(268,157)	SE	24.920%	(66,825)	
Mining Plant	399	3	-	SE	24.920%	-	
			<u>1,509,723,557</u>			<u>377,307,939</u>	

**Description of Adjustment:**

To reasonably represent the cost of system infrastructure required to serve our customers, the Company has identified capital projects that will be used and useful by December 31, 2022. This adjustment includes the year end balance of the plant additions that will be placed into service by December 31, 2022. Capital additions by functional category are summarized on separate sheets, indicating the in-service date and amount by project. Projects over \$10 million (total company basis) are described on pages 8.4.28 through 8.4.32. Retirements of plant in service are also walked forward through the test period. This adjustment reflects the net impact of capital additions, and retirements. The related tax impact is included in adjustments 7.4 and 7.5 except for a small tax adjustment not included in the Power Tax adjustment.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
(cont.) Pro Forma Plant Additions

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Intangible Plant	303	3	-	CA	Situs	-	
Intangible Plant	303	3	(615,486)	CN	30.990%	(190,739)	
Intangible Plant	302	3	-	SG	26.002%	-	
Intangible Plant	302	3	-	SG	26.002%	-	
Intangible Plant	303	3	(1,552)	ID	Situs	-	
Intangible Plant	303	3	(6,539)	OR	Situs	(6,539)	
Intangible Plant	303	3	(73,429)	SE	24.920%	(18,299)	
Intangible Plant	302	3	(1,132,698)	SG	26.002%	(294,521)	
Intangible Plant	302	3	(83,981)	SG-P	26.002%	(21,836)	
Intangible Plant	302	3	(268,568)	SG-U	26.002%	(69,832)	
Intangible Plant	303	3	-	SG	26.002%	-	
Intangible Plant	303	3	44,779,220	SO	27.125%	12,146,458	
Intangible Plant	303	3	(10,105)	UT	Situs	-	
Intangible Plant	303	3	-	WA	Situs	-	
Intangible Plant	303	3	(139,114)	WYP	Situs	-	
Intangible Plant	303	3	-	WYU	Situs	-	
			<u>42,447,748</u>			<u>11,544,691</u>	
Total Adjustment			<u>1,552,171,305</u>			<u>388,852,630</u>	8.4.4
<b>Adjustments to Tax:</b>							
Schedule M Addition - OR - Book Depr	SCHMAT	3	(51,560)	OR	Situs	(51,560)	
Schedule M Addition - SO - Book Depr	SCHMAT	3	(85,068)	SO	27.125%	(23,075)	
Schedule M Addition - SG - Book Depr	SCHMAT	3	162,039	UT	Situs	-	
Schedule M Addition - UT - Book Depr	SCHMAT	3	<u>(1,936,866)</u>	SG	26.002%	<u>(503,619)</u>	
			<u>(1,911,455)</u>			<u>(578,254)</u>	
Schedule M Deduction - OR - Tax Depreciation	SCHMDT	3	(85,125)	OR	Situs	(85,125)	
Schedule M Deduction - SO - Tax Depreciation	SCHMDT	3	4,955,879	SO	27.125%	1,344,293	
Schedule M Deduction - SG - Tax Depreciation	SCHMDT	3	2,074,888	UT	Situs	-	
Schedule M Deduction - UT - Tax Depreciation	SCHMDT	3	<u>(6,839,470)</u>	SG	26.002%	<u>(1,778,383)</u>	
			<u>106,172</u>			<u>(519,215)</u>	
Deferred Inc Tax Exp - OR - Book Depr	41110	3	12,677	OR	Situs	12,677	
Deferred Inc Tax Exp - SO - Book Depr	41110	3	20,915	SO	27.125%	5,673	
Deferred Inc Tax Exp - SG - Book Depr	41110	3	(39,840)	UT	Situs	-	
Deferred Inc Tax Exp - UT - Book Depr	41110	3	<u>476,210</u>	SG	26.002%	<u>123,823</u>	
			<u>469,962</u>			<u>142,173</u>	
Deferred Inc Tax Exp - OR - Tax Depr	41010	3	(20,929)	OR	Situs	(20,929)	
Deferred Inc Tax Exp - SO - Tax Depr	41010	3	1,218,482	SO	27.125%	330,516	
Deferred Inc Tax Exp - SG - Tax Depr	41010	3	510,144	UT	Situs	-	
Deferred Inc Tax Exp - UR - Tax Depr	41010	3	<u>(1,681,593)</u>	SG	26.002%	<u>(437,244)</u>	
			<u>26,104</u>			<u>(127,657)</u>	

**Description of Adjustment:**

To reasonably represent the cost of system infrastructure required to serve our customers, the Company has identified capital projects that will be used and useful by December 31, 2022. This adjustment includes the year end balance of the plant additions that will be placed into service by December 31, 2022. Capital additions by functional category are summarized on separate sheets, indicating the in-service date and amount by project. Projects over \$10 million (total company basis) are described on pages 8.4.28 through 8.4.32. Retirements of plant in service are also walked forward through the test period. This adjustment reflects the net impact of capital additions, and retirements. The related tax impact is included in adjustments 7.4 and 7.5 except for a small tax adjustment not included in the Power Tax adjustment.

This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.



PacifiCorp  
Oregon General Rate Case - December 2023  
(cont.) Pro Forma Plant Additions - Incremental Tax Impacts

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Tax:</b>							
ADIT - OR	282	3	8,255	OR	Situs	8,255	
ADIT - SO	282	3	(1,299,881)	SO	27.125%	(352,595)	
ADIT - SG	282	3	(468,906)	UT	Situs	-	
ADIT - UT	282	3	1,205,387	SG	26.002%	313,422	
			<u>(555,145)</u>			<u>(30,919)</u>	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	(190,965)	SG	26.002%	(49,654)	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	(200,258.10)	SG	26.002%	(52,071)	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	5,547,174.14	SG	26.002%	1,442,363	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	2,465,368	OR	Situs	2,465,368	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	300,556	CA	Situs	-	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	590,868	WA	Situs	-	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	363,985	WYP	Situs	-	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	3,527,755	UT	Situs	-	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	409,149	ID	Situs	-	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	1,775,050	SO	27.125%	481,486	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	(48,760)	CN	30.990%	(15,111)	
Sch. M Addition - Increm. Book Depr.	SCHMAT	3	(8,142)	SE	24.920%	(2,029)	
			<u>14,531,780</u>			<u>4,270,353</u>	
DIT Exp - Increm. Book Depr.	41110	3	46,952	SG	26.002%	12,208	
DIT Exp - Increm. Book Depr.	41110	3	49,237	SG	26.002%	12,802	
DIT Exp - Increm. Book Depr.	41110	3	(1,363,862)	SG	26.002%	(354,628)	
DIT Exp - Increm. Book Depr.	41110	3	(606,150)	OR	Situs	(606,150)	
DIT Exp - Increm. Book Depr.	41110	3	(73,897)	CA	Situs	-	
DIT Exp - Increm. Book Depr.	41110	3	(145,274)	WA	Situs	-	
DIT Exp - Increm. Book Depr.	41110	3	(89,492)	WYP	Situs	-	
DIT Exp - Increm. Book Depr.	41110	3	(867,355)	UT	Situs	-	
DIT Exp - Increm. Book Depr.	41110	3	(100,596)	ID	Situs	-	
DIT Exp - Increm. Book Depr.	41110	3	(436,425)	SO	27.125%	(118,381)	
DIT Exp - Increm. Book Depr.	41110	3	11,988	CN	30.990%	3,715	
DIT Exp - Increm. Book Depr.	41110	3	2,002	SE	24.920%	499	
			<u>(3,572,871)</u>			<u>(1,049,935)</u>	
ADIT - Increm. Book Depr.	282	3	(23,476)	SG	26.002%	(6,104)	
ADIT - Increm. Book Depr.	282	3	(24,618)	SG	26.002%	(6,401)	
ADIT - Increm. Book Depr.	282	3	681,931	SG	26.002%	177,314	
ADIT - Increm. Book Depr.	282	3	303,075	OR	Situs	303,075	
ADIT - Increm. Book Depr.	282	3	36,948	CA	Situs	-	
ADIT - Increm. Book Depr.	282	3	72,637	WA	Situs	-	
ADIT - Increm. Book Depr.	282	3	44,746	WYP	Situs	-	
ADIT - Increm. Book Depr.	282	3	433,677	UT	Situs	-	
ADIT - Increm. Book Depr.	282	3	50,298	ID	Situs	-	
ADIT - Increm. Book Depr.	282	3	218,212	SO	27.125%	59,191	
ADIT - Increm. Book Depr.	282	3	(5,994)	CN	30.990%	(1,858)	
ADIT - Increm. Book Depr.	282	3	(1,001)	SE	24.920%	(249)	
			<u>1,786,435</u>			<u>524,967</u>	

**Description of Adjustment:**

The tax portion of this adjustment represents the following:

- 1) Adjustments for the tax impacts of the differences between the original capital additions included in 7.4\_R - PowerTax Adjustment and the final capital additions included in this adjustment.
- 2) Tax impact of the difference between 2022 book depreciation for the original capital additions submitted and included in 7.4\_R - PowerTax adjustment and the final level of annualized book depreciation included in Adjustment 6.1\_R/6.2\_R.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Customer Advances for Construction**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Customer Advances	252	1	(116,018)	CA	Situs	-	8.5.1
Customer Advances	252	1	(645,790)	OR	Situs	(645,790)	8.5.1
Customer Advances	252	1	(683,516)	WA	Situs	-	8.5.1
Customer Advances	252	1	(1,345,561)	ID	Situs	-	8.5.1
Customer Advances	252	1	(17,097,144)	UT	Situs	-	8.5.1
Customer Advances	252	1	(2,110,851)	WYP	Situs	-	8.5.1
Customer Advances	252	1	21,998,879	SG	26.002%	5,720,096	8.5.1
			-			5,074,306	

**Description of Adjustment:**

Customer advances for construction are booked into FERC account 252 and do not reflect the proper allocation factor. This adjustment corrects the allocation of customer advances for construction.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Regulatory Assets & Liabilities Amortization**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Revenues:</b>							
Pryor Mountain REC Sales	456	3		OR	Situs		8.6.6_R_CONF
FERC OATT Deferral Refund	456	3		OR	Situs		8.6.7_CONF
<b>Adjustment to Expense:</b>							
Elec. Plant Acq. Amort. Exp.	406	3	(4,706,208)	SG	26.002%	(1,223,697)	8.6.1
Oregon Depreciation Decrease Deferral	407	3	(2,828,006)	OR	Situs	(2,828,006)	8.6.9
TE Pilot Deferral Amort.	407	3	-	OR	Situs	-	Removed
<b>Adjustment to Rate Base:</b>							
Elec. Plant Gross Acq.	114	3	(141,186,243)	SG	26.002%	(36,710,910)	8.6.1
Elec. Plant Acq. Acc. Amort.	115	3	137,153,218	SG	26.002%	35,662,252	8.6.1
<b>Adjustment to Tax:</b>							
Schedule M Adjustment	SCHMDT	3	2,828,006	OR	Situs	2,828,006	8.6.9
Deferred Income Tax Expense	41010	3	695,313	OR	Situs	695,313	8.6.9
Schedule M Adjustment	SCHMAT	3		OR	Situs		8.6.7
Deferred Income Tax Expense	41110	3		OR	Situs		8.6.7

**Description of Adjustment:**

This adjustment adds into results the proposed amortization of deferred expenses from the Transportation Electrification Pilot deferral (Docket UM 1964), and the deferral of Oregon's Share of Pryor Mountain REC Revenues in 2021 and 2022. This adjustment also adds into Oregon results the 2023 level of annual revenues expected from the sales of REC from Pryor Mountain.

In addition, this adjustment walks forward the amortization of the remainder of the Post-2017 FERC OATT Revenue Deferral balance, net of the net book value of replaced wind equipment, as well as the continued amortization of the Oregon Depreciation Decrease deferral that were approved in the Company's last general rate case, Docket No. UE 374.

Finally, this adjustment also walks forward Electric Plant Acquisition in the base period (12 months ended June 2021) to pro forma period levels (12 months ending December 2023).

*This adjustment was revised in Reply to remove from results the Transportation Electric Pilot deferral amortization, Deferred Pryor Mountain RECs amortization from base rates. Additional backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp  
Oregon General Rate Case - December 2023  
Regulatory Assets & Liabilities Amortization  
Pryor Mountain REC Sales Revenue Forecast**

Note: Please see Confidential Exhibit PAC/1008 for redacted information.

	Total Company			SG	OR Alloc.
	Quantity	Rate	Revenue	Factor	Revenue
Jan-23	[REDACTED]				
Feb-23					
Mar-23					
Apr-23					
May-23					
Jun-23					
Jul-23					
Aug-23					
Sep-23					
Oct-23					
Nov-23					
Dec-23					
					Ref 8.6_R
					Ref 8.6.5
					Above

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**FERC 105 (PHFU) Adjustment**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Remove PHFU	105	1	(10,603,216)	SG	26.002%	(2,757,023)	
Remove PHFU	105	1	(683,318)	CA	Situs	-	
Remove PHFU	105	1	(6,893,577)	OR	Situs	(6,893,577)	
Remove PHFU	105	1	(5,715,537)	UT	Situs	-	
Remove PHFU	105	1	(601)	WYP	Situs	-	
			<u>(23,896,248)</u>			<u>(9,650,600)</u>	8.7.1

**Description of Adjustment:**

This adjustment removes all Plant Held for Future Use (PHFU) assets from FERC account 105. The company is making this adjustment in compliance with UE 116, Order No. 01-787, Appendix A, page 4 of 5.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculations in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Pension & Other Post-retirement Balances Removal

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Net Prepaid Balance	128	1	(28,656,862)	SO	27.125%	(7,773,234)	8.8.1
Net Prepaid Balance	182M	1	(406,817,630)	SO	27.125%	(110,350,136)	8.8.1
Net Prepaid Balance	2283	1	<u>74,432,333</u>	SO	27.125%	<u>20,189,927</u>	8.8.1
			<u>(361,042,159)</u>			<u>(97,933,443)</u>	
<b>Adjustment to Tax:</b>							
ADIT Balances	190	1	(21,054,777)	SO	27.125%	(5,711,152)	8.8.2
ADIT Balances	283	1	<u>109,063,328</u>	SO	27.125%	<u>29,583,657</u>	8.8.2
			<u>88,008,551</u>			<u>23,872,504</u>	

**Description of Adjustment:**

This adjustment removes the Company's net prepaid asset associated with its pension and other postretirement welfare plans, net of associated accumulated deferred income taxes in unadjusted results. Per Order No. 15-226 in Docket UM 1633, the net pension and post retirement prepaid is not to be included in rate base for Oregon.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Remove Rolling Hills

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Other Plant	341	1	(3,478,252)	SG	26.002%	(904,407)	
Other Plant	343	1	(170,634,366)	SG	26.002%	(44,367,940)	
Other Plant	344	1	(7,930,556)	SG	26.002%	(2,062,084)	
Other Plant	345	1	(12,436,383)	SG	26.002%	(3,233,679)	
Other Plant	346	1	(659,497)	SG	26.002%	(171,481)	
			<u>(195,139,054)</u>			<u>(50,739,591)</u>	8.9.1
<b>Adjustment to Depreciation Reserve:</b>							
Other Plant	108OP	1	(17,881,562)	SG	26.002%	(4,649,521)	8.9.1
<b>Adjustment to O&amp;M Expense:</b>							
Administrative & General	929	1	(431,525)	SO	27.125%	(117,052)	8.9.1
Misc. Oth. Power Supply	549	1	(28,437)	SG	26.002%	(7,394)	8.9.1
Misc. Oth. Power Supply	553	1	(1,112,621)	SG	26.002%	(289,301)	8.9.1
<b>Adjustment to Tax:</b>							
Schedule M Adjustment	SCHMAP	1	85	SCHMDEXP	22.600%	19	
Schedule M Adjustment	SCHMDT	1	(10,880,231)	TAXDEPR	26.410%	(2,873,436)	
Schedule M Adjustment	SCHMDT	1	(9,068)	GPS	27.125%	(2,460)	
Deferred Tax Expense	41010	1	(2,675,079)	TAXDEPR	26.410%	(706,480)	
Deferred Tax Expense	41010	1	(2,230)	GPS	27.125%	(605)	
Deferred Tax Expense	41110	1	(25)	OR	Situs	(25)	
Accumulated Def Inc Tax Balance	282	1	13,118,713	OR	Situs	13,118,713	

**Description of Adjustment:**

This adjustment removes the gross plant, accumulated depreciation, depreciation expense and O&M amounts related to the Rolling Hills wind resource from the 12 months ended June 2021. This treatment is consistent with Commission Order No. 08-548. Depreciation expense for Rolling Hills is removed in Adjustment 6.1, Depreciation / Amortization Expense Adjustment.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Deer Creek Mine Closure**

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	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
<u>Remove base period expense</u>							
Closure cost amortization - WY	506	1	(35,379,413)	SG	26.002%	(9,199,271)	8.10.1
<u>Add pro forma expense</u>							
UMWA Pension Withdrawal Liability Pymt	926	1	2,967,013	SO	27.125%	804,809	8.10.2
<b>Adjustment to Rate Base:</b>							
<u>Remove base period regulatory assets</u>							
Closure Costs	182M	1	(75,945,690)	SE	24.920%	(18,925,772)	B-16
Unrecovered Plant	182M	1	(2,436,501)	SE	24.920%	(607,180)	B-16
Unrecovered Plant	182M	1	1,633,354	OR	Situs	1,633,354	B-16
Post-Retire. Settlement Loss	182M	1	(8,323,073)	SO	27.125%	(2,257,651)	B-16
Post-Retire. Settlement Savings	182M	1	9,264,033	OR	Situs	9,264,033	B-16
<b>Adjustment to Tax:</b>							
<u>Remove Base Period Tax</u>							
Schedule M Addition	SCHMAT	1	(18,093,654)	SE	24.920%	(4,508,964)	
Schedule M Addition	SCHMAT	1	(3,702,799)	SO	27.125%	(1,004,392)	
Schedule M Deduction	SCHMDT	1	(3,264,033)	SE	24.920%	(813,402)	
Schedule M Deduction	SCHMDT	1	(248,200)	OR	Situs	(248,200)	
Def Income Tax Expense	41110	1	4,448,614	SE	24.920%	1,108,601	
Def Income Tax Expense	41110	1	910,392	SO	27.125%	246,946	
Def Income Tax Expense	41010	1	(802,515)	SE	24.920%	(199,988)	
Def Income Tax Expense	41010	1	(61,024)	OR	Situs	(61,024)	
Accum Def Income Tax Balance	283	1	(29,952,417)	SE	24.920%	(7,464,184)	
Accum Def Income Tax Balance	283	1	68,930,513	SE	24.920%	17,177,580	
Accum Def Income Tax Balance	190	1	(28,303,872)	SE	24.920%	(7,053,364)	
Accum Def Income Tax Balance	283	1	595,182	SO	27.125%	161,444	
Accum Def Income Tax Balance	283	1	(2,330,252)	OR	Situs	(2,330,252)	

**Description of Adjustment:**

Oregon Order No. 15-161 in Docket UM 1712 approved closure of the Deer Creek mine located in Utah and ruled on several issues. This adjustment removes the Deer Creek Unrecovered Plant Regulatory Assets from results because these amounts are being recovered through separate tariff riders in Docket No. UE 374, Order No. 20-473. Order No. 15-161 authorized to include the \$3 million annual payment resulting from the Company's withdrawal from the 1974 Pension Trust associated with the Deer Creek Mine. These pension costs were previously included in the TAM, but are being moved from the TAM to base rates per resolution in Docket No. UE 374 and UE No. 375.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Emissions Control Investment Adjustment**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Hunter Clean Air Disallowance	312	1	(4,649,941)	SG	26.002%	(1,209,067)	8.11.1
Hunter Clean Air Disallowance	108SP	1	325,130	SG	26.002%	84,539	8.11.1
<b>Adjustment to Expense:</b>							
Hunter Clean Air Disallowance	403SP	1	(325,130)	SG	26.002%	(84,539)	8.11.1
<b>Adjustment to Return:</b>							
JB U3 & U4 Return Disallowance	930	3	(1,669,716)	OR	Situs	(1,669,716)	8.11.2
<b>Adjustment to Tax:</b>							
Schedule M Adjustment	SCHMAT	1	(325,130)	SG	26.002%	(84,540)	
Schedule M Adjustment	SCHMDT	1	(128,808)	SG	26.002%	(33,492)	
Deferred Income Tax Expense	41110	1	79,938	SG	26.002%	20,785	
Deferred Income Tax Expense	41010	1	(31,670)	SG	26.002%	(8,235)	
Accumulated Def Inc Tax Balance	282	1	471,095	SG	26.002%	122,493	

**Description of Adjustment:**

This adjustment removes 10% of the net book value of the Hunter U1 U1 Clean Air - PM & NOX LNB Clean Air equipment projects and reduces return on Jim Bridger Unit 3 & 4 SCR projects to authorized return equal to long-term debt cost as ordered in UE 374, Order No. 20-473.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Transmission Project Adjustment

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Transmission	352	3	(237,818)	SG	26.002%	(61,837)	8.12.1
Distribution	361	3	(120,000)	OR	Situs	(120,000)	8.11.2
			<u>(357,818)</u>			<u>(181,837)</u>	
<b>Adjustment to Reserve:</b>							
Transmission	108TP	3	17,650	SG	26.002%	4,589	8.12.1
Distribution	108364	3	23,910	OR	Situs	23,910	8.11.2
			<u>41,560</u>			<u>28,499</u>	
<b>Adjustment to Tax:</b>							
ADIT - Transmission	282	3	3,564	OR	Situs	3,564	
ADIT - Distribution	282	3	7,187	OR	Situs	7,187	
			<u>10,751</u>			<u>10,751</u>	

**Description of Adjustment:**

Rate base disallowances for specific transmission projects as discussed on Order No. 20-473, Docket No. UE 374.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Cholla Unit 4 Retirement

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	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense</b>							
Remove O&M expense	506	1	(14,648,254)	SG	26.002%	(3,808,804)	8.13.1
Add Closure Cost Reg. Asset Amort. Exp	407	3	937,832	SG	26.002%	243,853	8.13.2
Remove Deferred Property Tax	408	1	299,058	OR	Situs	299,058	8.13.3_R
<b>Adjustment to Rate Base</b>							
Remove M&S Inventory Balance	154	1	(5,341,897)	SG	26.002%	(1,388,987)	8.13.1
Remove Nonunion Severance Reg. Asset	182M	1	(2,700,000)	SG	26.002%	(702,048)	8.13.1
Remove Safe Harbor Lease Reg. Asset	182M	1	(836,167)	SG	26.002%	(217,418)	8.13.1
Remove Contra Reg. Asset Lease & Sev	182M	1	920,203	OR	Situs	920,203	8.13.1
Remove Cholla Property Tax Reg Asset	182M	1	(299,987)	OR	Situs	(299,987)	8.13.3_R
Add Dec. 2023 Cholla Closure Cost	182M	3	2,344,579	SG	26.002%	609,632	8.13.2
<b>Adjustment to Tax:</b>							
Property tax Reg asset amort - Sch M	SCHMAT	1	299,987	OR	Situs	299,987	
Property tax Reg asset amort - DIT Exp	41110	1	(73,757)	OR	Situs	(73,757)	
Property tax Reg asset amort - ADIT	283	1	73,757	OR	Situs	73,757	
Closure Cost Reg asset amort - Sch M	SCHMAT	3	937,832	SG	26.002%	243,853	
Closure Cost Reg asset amort - DIT	41110	3	(230,581)	SG	26.002%	(59,955)	
Closure Cost Reg asset amort - ADIT	283	3	(576,453)	SG	26.002%	(149,888)	
Remove Contra Reg Asset Lease & Sev	SCHMAT	3	(920,203)	OR	Situs	(920,203)	
Remove Contra Reg Asset Lease & Sev	41110	3	226,247	OR	Situs	226,247	
Remove Contra Reg Asset Lease & Sev	283	3	(226,247)	OR	Situs	(226,247)	

**Description of Adjustment:**

Consistent with the Company's Integrated Resource Plan, Cholla Unit 4 ceased operations December 31, 2020. As part of the December 2021 Oregon General Rate Case, the Oregon Commission authorized the Company to use deferred tax benefits as of December 31, 2020 to offset Cholla Unit 4 unrecovered plant balance, decommissioning and closure cost.

This adjustment removes O&M and materials and supplies balances from Oregon's Results. This adjustment then adds back into results the unrecovered closure and property tax regulatory asset balances and amortizations associated with the Test Period. The regulatory assets are being amortized over a three year period.

*The annual amortization expense for the Cholla Unit 4 Property Tax deferral has been removed in the Company's Reply adjustment. Additional backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Cholla Unit 4 Retirement**  
**Treatment of Cholla Property Taxes**

**Oregon Property Tax Deferral 2021**                      **639,589**   **Ref. 8.13.4**

	<b>End-of-Period June 2021</b>
Cholla Property Taxes Reg Asset	299,987
	<b>Ref. 8.13_R</b>

	<b>12 ME June 2021</b>	<b>12 ME Dec 2023</b>	<b>Difference</b>
Cholla Property Taxes Expense	(299,058)	-	<b>299,058</b>
			<b>Ref. 8.13_R</b>

<u>Date</u>	<u>Beg Bal</u>	<u>Amortization</u>	<u>Interest*</u>	<u>End Bal</u>
Dec-22				639,589
Jan-23	639,589		970	640,559
Feb-23	640,559		972	641,530
Mar-23	641,530		973	642,503
Apr-23	642,503		974	643,478
May-23	643,478		976	644,454
Jun-23	644,454		977	645,431
Jul-23	645,431		979	646,410
Aug-23	646,410		980	647,390
Sep-23	647,390		982	648,372
Oct-23	648,372		983	649,356
Nov-23	649,356		985	650,341
Dec-23	650,341		986	651,327
<b>Amort exp. 12 months ending December 2023</b>		<b>-</b>		

Adjustment 8.14 has been intentionally removed. For further details, please see the Reply Testimony of Ms. Sherona L. Cheung (Exhibit PAC/2000).

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Miscellaneous Rate Base**

<b>Adjustment to Rate Base:</b>	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
1 - Fuel Stock - Pro Forma	151	3	(52,153,560)	SE	24.920%	(12,996,740)	8.15.1_R
1 - Fuel Stock - Working Capital Deposit	25316	3	3,000	SE	24.920%	748	8.15.1_R
1 - Fuel Stock - Working Capital Deposit	25317	3	34,169	SE	24.920%	8,515	8.15.1_R
2 - Prepaid Overhauls	186M	3	(16,949,013)	SG	26.002%	(4,407,042)	8.15.1_R

**Description of Adjustment:**

1 - Fuel stock levels for the 13 month average year ending December 2023 are projected to be lower than the year ended June 2021 levels due to a decrease in the amount of coal stockpiled. The adjustment also reflects the change in projected working capital deposits.

2 - Balances for prepaid overhauls at the Lake Side, Chehalis and Currant Creek gas plants are walked forward to reflect payments and transfers of capital to electric plant in service during the year ending December 2023.

*This adjustment includes updated fuel stock balances to better reflect forecasted consumption levels reflected in the Company's TAM reply filing in Docket No. UE 400.*

PacifiCorp  
Oregon General Rate Case - December 2023  
Miscellaneous Rate Base

			Actuals	Pro Forma	
			Jun-2021 EOP Balance	Dec-2023 13 Mth. Avg. Balance	Adj. to 13 Mth. Avg. Balance
<b>1 - Coal Fuel Stock Balances by Plant</b>	<b>Account</b>	<b>Factor</b>			
Jim Bridger	151	SE	34,164,407	62,308,554	28,144,147
Cholla	151	SE	(0)	(0)	-
Colstrip	151	SE	1,907,941	2,162,716	254,775
Craig	151	SE	611,228	2,356,946	1,745,718
Hayden	151	SE	4,236,263	4,082,620	(153,643)
Hunter	151	SE	71,160,227	16,193,447	(54,966,780)
Huntington	151	SE	23,856,872	15,199,870	(8,657,002)
Dave Johnston	151	SE	11,802,796	8,788,572	(3,014,224)
Naughton	151	SE	24,588,118	10,041,103	(14,547,015)
Rock Garden	151	SE	31,430,017	30,470,480	(959,536)
<b>Total</b>			<b>203,757,869</b>	<b>151,604,309</b>	<b>(52,153,560)</b>

Ref. 8.15\_R

			Actuals	Pro Forma	
			Jun-2021 EOP Balance	Dec-2023 13 Mth. Avg. Balance	Adj. to 13 Mth. Avg. Balance
<b>1 - Working Capital Deposits</b>	<b>Account</b>	<b>Factor</b>			
UAMPS Working Capital Deposit	25316	SE	(2,806,000)	(2,803,000)	3,000
DPEC Working Capital Deposit	25317	SE	(2,675,522)	(2,641,353)	34,169

Ref. 8.15\_R

Ref. 8.15\_R

			Actuals	Pro Forma	
			Jun-2021 EOP Balance	Dec-2023 13 Mth. Avg. Balance	Adj. to 13 Mth. Avg. Balance
<b>2 - Overhaul Prepayments by Plant</b>	<b>Account</b>	<b>Factor</b>			
Lake Side 1	186M	SG	11,807,302	22,057,381	10,250,079
Chehalis	186M	SG	23,922,978	10,749,897	(13,173,081)
Currant Creek	186M	SG	23,241,474	9,204,028	(14,037,446)
Lake Side 2	186M	SG	21,225,077	20,767,776	(457,302)
Chehalis O&M	186M	SG	1,114,407	1,144,899	30,492
Currant Creek O&M	186M	SG	-	438,245	438,245
<b>Total</b>			<b>81,311,238</b>	<b>64,362,225</b>	<b>(16,949,013)</b>

Ref. 8.15\_R

**PacifiCorp  
Oregon General Rate Case - December 2023  
Carbon Plant Closure**

PAGE 8.16\_R

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Remove system alloc deferral	403SP	1	(11,539,055)	SG	26.002%	(3,000,357)	8.16.1
Excess decommissioning costs amort.	407	3	(1,705,494)	OR	Situs	(1,705,494)	8.16.2
<b>Adjustment to Rate Base:</b>							
Remove M&S Obsolete Inventory	182M	1	(3,448,669)	SG	26.002%	(896,715)	8.16.2
Remove M&S Obsolete Inventory	182M	1	89,744	OR	Situs	89,744	B-16
Excess decommissioning reserves	254	3	(4,039,377)	OR	Situs	(4,039,377)	8.16.2
<b>Adjustment to Tax:</b>							
Schedule M - Excess Decommissioning	SCHMDT	3	1,705,494	OR	Situs	1,705,494	
Deferred Income Tax Expense	41010	3	419,323	OR	Situs	419,323	
Accumulated Def Inc Tax Balance	190	3	993,141	OR	Situs	993,141	
Accumulated Def Inc Tax Balance	283	1	452,791	SG	26.002%	117,734	

**Description of Adjustment:**

The Carbon Plant was retired April, 2015 and fully recovered as of December 2020. This adjustment removes the allocation in the base period of accelerated depreciation deferral and amortization and returns excess decommissioning costs of the plant back to ratepayers over a five-year period per the proposal in the Company's 2018 Deprecation Study, UM 1968. This amortization schedule of the excess decommissioning costs, net of obsolete materials and supplies, over a five-year period was approved in the Company's general rate case Docket No. UE 374, in Order 20-473.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Remove Labor Day Wildfire Restoration**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Transmission Plant	355	1	(89,852,182)	SG	26.002%	(23,363,150)	
Distribution Plant	360	1	(430,798)	OR	Situs	(352,322)	
Distribution Plant	361	1	(816,620)	OR	Situs	(667,862)	
Distribution Plant	362	1	(6,775,813)	OR	Situs	(5,541,509)	
Distribution Plant	364	1	(8,855,242)	OR	Situs	(7,242,143)	
Distribution Plant	365	1	(5,572,291)	OR	Situs	(4,557,225)	
Distribution Plant	366	1	(2,764,594)	OR	Situs	(2,260,987)	
Distribution Plant	367	1	(6,449,237)	OR	Situs	(5,274,424)	
Distribution Plant	368	1	(9,762,008)	OR	Situs	(7,983,730)	
Distribution Plant	369	1	(6,036,591)	OR	Situs	(4,936,946)	
Distribution Plant	370	1	(1,652,422)	OR	Situs	(1,351,412)	
Distribution Plant	371	1	(57,132)	OR	Situs	(46,725)	
Distribution Plant	373	1	(409,154)	OR	Situs	(334,621)	
			<u>(139,434,083)</u>			<u>(63,913,056)</u>	8.17.1
<b>Adjustment to Depreciation Reserve:</b>							
Transmission Plant	108TP	1	755,195	SG	26.002%	196,364	
Distribution Plant	108360	1	6,591	OR	Situs	5,261	
Distribution Plant	108361	1	12,495	OR	Situs	9,972	
Distribution Plant	108362	1	103,673	OR	Situs	82,743	
Distribution Plant	108364	1	135,489	OR	Situs	108,135	
Distribution Plant	108365	1	85,258	OR	Situs	68,046	
Distribution Plant	108366	1	42,299	OR	Situs	33,760	
Distribution Plant	108367	1	98,676	OR	Situs	78,755	
Distribution Plant	108368	1	149,363	OR	Situs	119,208	
Distribution Plant	108369	1	92,362	OR	Situs	73,716	
Distribution Plant	108370	1	25,283	OR	Situs	20,178	
Distribution Plant	108371	1	874	OR	Situs	698	
Distribution Plant	108373	1	6,260	OR	Situs	4,996	
			<u>1,513,819</u>			<u>801,831</u>	8.17.1
<b>Adjustment to Tax:</b>							
Schedule M Deduction - SG - Tax Depr	SCHMDT	1	(8,535,960)	SG	26.002%	(2,219,500)	
Schedule M Deduction - OR - Tax Depr	SCHMDT	1	(2,927,292)	OR	Situs	(2,927,292)	
Schedule M Deduction - CA - Tax Depr	SCHMDT	1	(652,020)	CA	Situs	-	
			<u>(12,115,272)</u>			<u>(5,146,792)</u>	
Deferred Inc Tax Exp - SG - Tax Depr	41010	1	(2,098,702)	SG	26.002%	(545,699)	
Deferred Inc Tax Exp - OR - Tax Depr	41010	1	(719,722)	OR	Situs	(719,722)	
Deferred Inc Tax Exp - CA - Tax Depr	41010	1	(160,310)	CA	Situs	-	
			<u>(2,978,734)</u>			<u>(1,265,421)</u>	
ADIT - SG	282	1	2,632,090	SG	26.002%	684,390	
ADIT - OR	282	1	753,915	OR	Situs	753,915	
ADIT - CA	282	1	153,510	CA	Situs	-	
			<u>3,539,515</u>			<u>1,438,305</u>	

**Description of Adjustment:**

This adjustment removes the capital additions from the Base Period 12 months ended June 2021 for the Labor Day Wildfire Restoration capital projects. Correspondingly, these projects are also excluded from the depreciation normalizing calculations in Adjustment 6.1.

*This adjustment has been updated for allocation factor changes as a result of revisions made to the Company's revenue requirement calculation in Reply. Backup pages supporting this adjustment were submitted in Exhibit PAC 1002.*

## Tab R - Deply Adjustments

**PacifiCorp**  
**Oregon General Rate Case – December 2023**  
**Reply Adjustment Index**

The following adjustments were incorporated into the Company's Reply revenue requirement. For further details, please see the Reply Testimony of Ms. Sherona L. Cheung.

R_1	Meter Replacement Amortization
R_2	Clean Fuels Program Amortization
R_3	Remove Merwin in-lieu Project
R_4	Update Cross Hollows Install 2 <sup>nd</sup> Xfmr – Trans Project
R_5	Remove Electric Vehicle
R_6	Capitalized Officers' Incentives Adjustment
R_7	AURORA Access Fees
R_8	Advertising Expense



**Pacificorp**  
Oregon General Rate Case - December 2023  
Reply Adjustment Summary

	R_7	R_8
	AURORA Access Fees	Advertising Expense
1 Operating Revenues:		
2 General Business Revenues	-	-
3 Interdepartmental	-	-
4 Special Sales	-	-
5 Other Operating Revenues	-	-
6 Total Operating Revenues	-	-
7		
8 Operating Expenses:		
9 Steam Production	-	-
10 Nuclear Production	-	-
11 Hydro Production	-	-
12 Other Power Supply	-	-
13 Transmission	-	-
14 Distribution	-	-
15 Customer Accounting	-	-
16 Customer Service & Info	-	(21,699)
17 Sales	-	-
18 Administrative & General	37,280	-
19		
20 Total O&M Expenses	37,280	(21,699)
21	-	-
22 Depreciation	-	-
23 Amortization	-	-
24 Taxes Other Than Income	-	-
25 Income Taxes - Federal	(7,475)	4,351
26 Income Taxes - State	(1,693)	985
27 Income Taxes - Def Net	-	-
28 Investment Tax Credit Adj.	-	-
29 Misc Revenue & Expense	-	-
30		
31 Total Operating Expenses:	28,113	(16,363)
32		
33 Operating Rev For Return:	(28,113)	16,363
34		
35 Rate Base:		
36 Electric Plant In Service	-	-
37 Plant Held for Future Use	-	-
38 Misc Deferred Debits	-	-
39 Elec Plant Acq Adj	-	-
40 Nuclear Fuel	-	-
41 Prepayments	-	-
42 Fuel Stock	-	-
43 Material & Supplies	-	-
44 Working Capital	266	(155)
45 Weatherization Loans	-	-
46 Misc Rate Base	-	-
47		
48 Total Electric Plant:	266	(155)
49	-	-
50 Rate Base Deductions:		
51 Accum Prov For Deprec	-	-
52 Accum Prov For Amort	-	-
53 Accum Def Income Tax	-	-
54 Unamortized ITC	-	-
55 Customer Adv For Const	-	-
56 Customer Service Deposits	-	-
57 Misc Rate Base Deductions	-	-
58		
59 Total Rate Base Deductions	-	-
60		
61 Total Rate Base:	266	(155)
62		
63 Return on Rate Base	-0.001%	0.000%
64		
65 Return on Equity	-0.001%	0.001%
66		
67 TAX CALCULATION:		
68 Operating Revenue	(37,280)	21,699
69 Other Deductions	-	-
70 Interest (AFUDC)	-	-
71 Interest	6	(3)
72 Schedule "M" Additions	-	-
73 Schedule "M" Deductions	-	-
74 Income Before Tax	(37,286)	21,702
75		
76 State Income Taxes	(1,693)	985
77 Taxable Income	(35,593)	20,717
78		
79 Federal Income Taxes + Other	(7,475)	4,351
APPROXIMATE PRICE CHANGE	38,602	(22,468)

**PacifiCorp  
Oregon General Rate Case - December 2023  
Meter Replacement Amortization Adjustment**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
AMI Amortization Expense	407	1	(967,597)	OR	100.000%	(967,597)	R_1.1

**Description of Adjustment:**

This adjustment removes AMI Amortization expense from the test period as identified in AWEC 45.

PacifiCorp  
Oregon General Rate Case - December 2023  
Meter Replacement Amortization Adjustment

OR 187354 Meter Replc By AMI Amort 967,597 Ref. R\_1  
OR 187338 Carbon Amort - OR Portion 89,744  
1,057,340 Below

Date	Description	Account Number	Allocation	Amount
1/26/2021	OR 187354 Meter Replc By AMI Amort - OR	566983	OR	161,266
1/29/2021	OR 187338 Carbon Amort - OR Portion	566983	OR	14,957
2/19/2021	OR 187354 Meter Replc By AMI Amort - OR	566983	OR	161,266
2/25/2021	OR 187338 Carbon Amort - OR Portion	566983	OR	14,957
3/23/2021	OR 187338 Carbon Amort - OR Portion	566983	OR	14,957
3/25/2021	OR 187354 Meter Replc By AMI Amort - OR	566983	OR	161,266
3/31/2021	OR 187354 Meter Replc By AMI Amort - OR	566983	OR	(161,266)
3/31/2021	OR 187354 Meter Replc By AMI Amort - OR	566983	OR	(161,266)
3/31/2021	OR 187354 Meter Replc By AMI Amort - OR	566983	OR	(161,266)
3/30/2021	OR 187354 Meter Replc By AMI Amort - OR Jan	566983	OR	295,086
3/30/2021	OR 187354 Meter Replc By AMI Amort - OR Feb	566983	OR	295,086
3/30/2021	OR 187354 Meter Replc By AMI Amort - OR Mar	566983	OR	295,086
4/14/2021	OR 187338 Carbon Amort - OR Portion	566983	OR	14,957
4/22/2021	OR 187354 Meter Replc By AMI Amort - OR Apr	566983	OR	295,086
5/18/2021	OR 187338 Carbon Amort - OR Portion	566983	OR	14,957
5/26/2021	OR 187354 Meter Replc By AMI Amort - OR Apr	566983	OR	295,086
6/14/2021	OR 187338 Carbon Amort - OR Portion	566983	OR	14,957
6/14/2021	OR 187354 Meter Replc By AMI Amort - OR June	566983	OR	295,086
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Jan	566983	OR	(295,086)
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Feb	566983	OR	(295,086)
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Mar	566983	OR	(295,086)
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Apr	566983	OR	(295,086)
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR May	566983	OR	(295,086)
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR June	566983	OR	(295,086)
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Jan	566983	OR	161,266
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Feb	566983	OR	161,266
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Mar	566983	OR	161,266
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Apr	566983	OR	161,266
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR May	566983	OR	161,266
6/30/2021	OR 187354 Meter Replc By AMI Amort - OR Jun	566983	OR	161,266
				<u>1,057,340</u>

PacifiCorp  
Oregon General Rate Case - December 2023  
Clean Fuels Program Amortization

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b> Clean Fuels Amortization Expense	908	1	(1,240,501)	OR	100.000%	(1,240,501)	R_2.1

**Description of Adjustment:**

This adjustment removes Clean fuels Amortization expense from rate base as identified in OPUC 428



**PacifiCorp  
 Oregon General Rate Case - December 2023  
 Clean Fuels Program Amortization**

<b>Date</b>	<b>Description</b>	<b>Account Number</b>	<b>Allocation</b>	<b>Amount</b>
7/21/2020	OR Clean Fuel Program Amortz Expense	553475	OR	(36,006)
7/21/2020	OR Clean Fuel Program Amortz Expense	553475	OR	(36,006)
7/31/2020	OR Clean Fuel Program Amortz Expense	553475	OR	18,880
8/31/2020	OR Clean Fuel Program Amortz Expense	553475	OR	139,084
9/30/2020	OR Clean Fuel Program Amortz Expense	553475	OR	227,710
10/31/2020	OR Clean Fuel Program Amortz Expense	553475	OR	15,841
11/30/2020	OR Clean Fuel Program Amortz Expense	553475	OR	18,984
12/31/2020	OR Clean Fuel Program Amortz Expense	553475	OR	66,721
1/31/2021	OR Clean Fuel Program Amortz Expense	553475	OR	997
2/28/2021	OR Clean Fuel Program Amortz Expense	553475	OR	26,646
3/31/2021	OR Clean Fuel Program Amortz Expense	553475	OR	466,603
4/30/2021	OR Clean Fuel Program Amortz Expense	553475	OR	210,557
6/29/2021	OR Clean Fuel Program Amortz Expense	553475	OR	11,232
6/30/2021	OR Clean Fuel Program Amortz Expense	553475	OR	109,258
				<b>1,240,501</b>

**Ref. R\_2**

PacifiCorp  
Oregon General Rate Case - December 2023  
Remove Merwin in-lieu Project

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Hydro Plant	332	3	(14,144,756)	SG-P	26.002%	(3,677,886)	R_3.1
<b>Adjustment to Depreciation Expense:</b>							
Hydro Plant	403HP	3	(387,641)	SG-P	26.002%	(100,793)	R_3.1
<b>Adjustment to Depreciation Reserve:</b>							
Hydro Plant	108HP	3	387,641	SG-P	26.002%	100,793	R_3.1
<b>Adjustment to Tax:</b>							
Schedule M Adjustment	SCHMAT	3	(387,641)	SG	26.002%	(100,793)	
Schedule M Adjustment	SCHMDT	3	(530,428)	SG	26.002%	(137,921)	
Deferred Inc Tax Expense	41010	3	(35,106)	SG	26.002%	(9,128)	
Accum Def Inc Tax Balance	282	3	35,106	SG	26.002%	9,128	

**Description of Adjustment:**

This adjustment removes the Merwin in-lieu project from rate base because the scope of the project changed resulting in the in-service date moving beyond December 2022 as stated in OPUC 229.

**PacifiCorp  
Oregon General Rate Case - December 2023  
Remove Merwin in-lieu Project**

**Electric Plant in Service**

	<b>Account</b>	<b>Factor</b>	<b>Dec-22</b>	
Hydro Plant	332	SG-P	<u>14,144,756</u>	Ref R_3

**Depreciation Expense\***

	<b>Account</b>	<b>Factor</b>	<b>Dec-22</b>	
Hydro Plant	403HP	SG-P	<u>387,641</u>	Ref R_3

**Depreciation Reserve**

	<b>Account</b>	<b>Factor</b>	<b>Dec-22</b>	
Hydro Plant	108HP	SG-P	<u>(387,641)</u>	Ref R_3

*\*Composite Depreciation Rate - Hydro Plant* 2.741%

UE 399 / PacifiCorp  
April 18, 2022  
OPUC Data Request 229 – 1<sup>st</sup> Supplemental

R\_3.2

### **OPUC Data Request 229**

**Merwin Downstream In-Lieu** - Please provide the underlying details of the “in lieu” fund, in your response and demonstrate how these funds meet with the requirements of the Lewis Settlement Agreement (LSA) dated November 30, 2004 (LSA) for each of the following items:

- (a) The determination by NOAA Fisheries and USFWS on the need for In Lieu Fund as required by Section 7.6 of the LSA;
- (b) When fund was established;
- (c) Annual balances; and
- (d) Allocation of funds and underlying details.

### **1<sup>st</sup> Supplemental Response to OPUC Data Request 229**

Further to the Company’s response to OPUC Data Request 229 dated April 11, 2022, and the telephone conference held between representatives of the Public Utility Commission of Oregon (OPUC) staff and the Company on April 14, 2022, the Company responds as follows:

The Company’s initial filing included “in-lieu” funding, however, with the National Marine Fisheries Service and United States (U.S.) Fish and Wildlife Service (FWS) now requiring the construction of two new facilities to facilitate upstream and downstream fish passage from the Merwin Reservoir, the “in-lieu” funding will be removed. PacifiCorp will make this update in its July 2022 Reply Filing in this proceeding.

**PacifiCorp  
Oregon General Rate Case - December 2023  
Update Cross Hollows Install 2nd Xfmr - Trans Project**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
Transmission Plant	355	3	(1,773,396)	SG	26.002%	(461,114)	R_4.1
<b>Adjustment to Depreciation Expense:</b>							
Transmission Plant	403TP	3	(30,568)	SG	26.002%	(7,948)	R_4.1
<b>Adjustment to Depreciation Reserve:</b>							
Transmission Plant	108TP	3	30,568	SG	26.002%	7,948	R_4.1
<b>Adjustment to Tax:</b>							
Schedule M Adjustment	SCHMAT	3	(30,568)	SG	26.002%	(7,948)	
Schedule M Adjustment	SCHMDT	3	(66,502)	SG	26.002%	(17,292)	
Deferred Inc Tax Expense	41010	3	(8,835)	SG	26.002%	(2,297)	
Accum Def Inc Tax Balance	282	3	8,835	SG	26.002%	2,297	

**Description of Adjustment:**

This adjustment reflects a correction to the "Cross Hollows Install 2<sup>nd</sup> Xfmr – Trans" project as identified in the Company's response to OPUC data request 488.

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Update Cross Hollows Install 2nd Xfmr - Trans Project**

**Electric Plant in Service**

	<b>Account</b>	<b>Factor</b>	<b>May-22</b>	
Transmission Plant	355	SG	<u>1,773,396</u>	Ref R_4

**Depreciation Expense\***

	<b>Account</b>	<b>Factor</b>	<b>May-22</b>	
Transmission Plant	403TP	SG	<u>30,568</u>	Ref R_4

**Depreciation Reserve**

	<b>Account</b>	<b>Factor</b>	<b>May-22</b>	
Transmission Plant	108TP	SG	<u>(30,568)</u>	Ref R_4

*\*Composite Depreciation Rate -Transmission Plant* 1.724%

**PacifiCorp  
Oregon General Rate Case - December 2023  
Remove Electric Vehicle**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Rate Base:</b>							
General Plant	392	3	(39,486)	OR	Situs	(39,486)	R_5.1

<b>Adjustment to Tax:</b>							
Schedule M Adjustment	SCHMDT	3	(12,636)	OR	Situs	(12,636)	
Deferred Inc Tax Expense	41010	3	(3,107)	OR	Situs	(3,107)	
Accum Def Inc Tax Balance	282	3	4,889	OR	Situs	4,889	

**Description of Adjustment:**

This adjustment removes the electric vehicle from rate base that was identified in OPUC 433 part b.

**PacifiCorp  
Oregon General Rate Case - December 2023  
Remove Electric Vehicle**

Page R\_5.1

**Electric Plant in Service**

	<b>Account</b>	<b>Factor</b>	<b><u>May-22</u></b>	
General Plant	392	OR	39,486	Ref R_5



UE 399 / PacifiCorp  
May 10, 2022  
OPUC Data Request 433

R\_5.2

### OPUC Data Request 433

**Transportation Electrification** - Referencing the Company's response to OPUC DR 294:

- (a) Please list any electric vehicles currently in use in PacifiCorp's fleet that entered the Company's rate base in prior rate cases, identifying:
  - i. Model;
  - ii. Manufacturer;
  - iii. Year;
  - iv. Expected average vehicle miles traveled; and
  - v. Use case of the vehicle while in the Company's fleet.
  
- (b) Referencing the 2020 Ford Fusion Titanium Sedan Hybrid referenced in in Attach OPUC 294:
  - i. Please describe this vehicle's use case in the Company's fleet;
  - ii. Please describe the percentage of this vehicle's miles traveled that is expected to be fueled by electricity;
  - iii. Please describe where this vehicle is expected to charge its battery and the expected price per kWh.

### Response to OPUC Data Request 433

- (a) Please refer to Attachment OPUC 433 which provides a list of electric and hybrid vehicles currently in use in PacifiCorp's fleet. Vehicles that were in-service prior to June 2019 would have been included in the base period data in the Company's prior general rate case (GRC), Docket UE-374. In the last GRC, there was also forecasted capital project dollars of approximately \$3.9 million included for replacement of deteriorated vehicles in Oregon. Embedded in this forecasted amount is likely amounts designated for electric vehicle (EV) purchases.
  
- (b) Since the Company's response to OPUC Data Request 294, unit 80394, which was the one new purchase included in the response, has been transferred outside of Oregon. As such, the Company will remove a rate base balance of \$39,486 from this GRC in its Reply Testimony filing.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

**PacifiCorp  
Oregon General Rate Case - December 2023  
Capitalized Officers' Incentives Adjustment**

PAGE R\_6

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Depreciation Expense:</b>							
Deprec. Exp. Capitalization of Officer Incentive	403368	3	(3,224)	OR	Situs	(3,224)	R_6.1
<b>Adjustment to Rate Base:</b>							
Remove Capitalization of Officer Incentive	1869	3	(101,493)	OR	Situs	(101,493)	R_6.1
<b>Adjustment to Tax:</b>							
Schedule M Adjustment	SCHMDT	3	(3,224)	OR	Situs	(3,224)	
Deferred Income Tax Expense	41010	3	(801)	OR	Situs	(801)	
ADIT Balance	282	3	24,954	OR	Situs	24,954	

**Description of Adjustment:**

This adjustment includes a reduction to rate base and associated depreciation expense regarding officer incentives consistent with the Commission order in Docket No. UE-374 and the testimony of OPUC witness, Ms. Heather Cohen in Docket No. UE-374 stating 'Staff typically disallows the total amount of officers incentives capitalized in plant since the last rate case' (Staff/400/Cohen/10, lines 7-8). The Company's last general rate case (UE-374) was effective 2021. The current general rate case is requested to be effective 2023. Accordingly, the Company has calculated the capitalized incentives since the last case (2021), and prepared this adjustment to remove 2022's capitalized incentives. However, since 2022 balance is yet unknown, for purposes of this adjustment the Company applied OPUC Staff's five-year average methodology used in the prior rate case to estimate unknown years' disallowance amount.

PacifiCorp  
Oregon General Rate Case - December 2023  
Capitalized Officers' Incentives Adjustment

**Removal of Capitalization for Officer (NEO's) Incentives**

Calendar Year	PacifiCorp NEO Capitalized AIP	Oregon's Allocated share	Ref
2017	410,100	111,165	OPUC 313
2018	295,922	80,898	OPUC 313
2019	397,773	109,557	OPUC 313
2020	416,671	117,263	OPUC 313
2021	316,452	88,581	OPUC 313, 1st Supplemental
2022	367,384	101,493	5-Yr Historical Ave (2017 - 2021)
<u>Removal:</u>			
2022	367,384	101,493	Percentage
	<b>367,384</b>	<b>101,493</b>	27.626%
		<b>Ref R_6</b>	

**Depreciation Expense for Officer (NEO's) Incentives**

Test Year Gross Plant	9,044,082,255
Annual Test Year Depreciation	287,295,417
Average Depreciation Percentage to Rate Base	3.18%
	(Oregon Share)
	<b>3,224</b>
	<b>Ref R_6</b>

**PacifiCorp  
Oregon General Rate Case - December 2023  
AURORA Access Fees**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Aurora Fees	921	3	16,480	OR	Situs	16,480	R_7.1
GUROBI Solver	921	3	20,800	OR	Situs	20,800	R_7.1

**Description of Adjustment:**

This adjustment adds Aurora and GUROBI access fees for 4 participants in the Test Period.

**PacifiCorp  
 Oregon General Rate Case - December 2023  
 AURORA Access Fees**

<b>Incremental O&amp;M</b>	<b>CY 2023 Amount</b>	
Aurora Fees	\$ 16,480	
GUROBI Solver	\$ 20,800	
	<b>\$ 37,280</b>	<b>Ref. R_7</b>

**November 27, 2022 to November 26, 2023**

	<b>Aurora</b>	<b>GUROBI</b>
User 1	\$ 4,120	\$ 5,200
User 2	\$ 4,120	\$ 5,200
User 3	\$ 4,120	\$ 5,200
User 4	\$ 4,120	\$ 5,200
	<b>\$ 16,480</b>	<b>\$ 20,800</b>
<b>Total</b>	<b>\$ 37,280</b>	

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Advertising Expense**

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL</u> <u>COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OR</u> <u>ALLOCATED</u>	<u>REF#</u>
<b>Adjustment to Expense:</b>							
Removal of system allocation	909	1	(70,018)	CN	30.990%	(21,699)	R_8.1

**Description**

In response to OPUC Staff witness Jent's proposal to remove specific category C and unclassified advertising expenses, the Company has reviewed the items identified by Staff and confirmed that only a subset of the identified expense line items should be removed. This adjustment removes the incorrectly allocated advertising expenses confirmed in the Company's analysis from the base year. For further details and discussions on the issue, please refer to the reply testimony of Company witness Sherona L. Cheung.

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Remove Advertising Expense**

<b>FERC Account</b>	<b>Account Number</b>	<b>Description</b>	<b>Amount</b>	<b>Alloc</b>	<b>REF</b>
9090000	530022	Jun-2021 Accrual THE 3THIRDS GROUP INC	46,525.00	CN	R_8
9090000	530022	Pinedale WY letter	1,091.43	CN	R_8
9090000	530022	Project Support per Rate Card Pricing	7,277.00	CN	R_8
9090000	530022	Rawlins WY letter	262.65	CN	R_8
9090000	530022	RMP Door Hangers	645.00	CN	R_8
9090000	530022	RMP Here to Help/FFN Cards	1,826.17	CN	R_8
9090000	530022	RMP outage emails	487.50	CN	R_8
9090000	530022	RMP Outage Mailing	4,724.00	CN	R_8
9090000	530022	RMP postcard	394.48	CN	R_8
9090000	530022	RMP-Winter/Contact Info Postcard + Mailing	4,380.00	CN	R_8
9090000	530022	SUBSCRIPTION NEWS LETTER	630.04	CN	R_8
9090000	530022	UT Outage	707.73	CN	R_8
9090000	530022	Wellington letter	733.02	CN	R_8
9090000	545150	Utah Tremonton Leader Ad-Local Ad *Trip from 03/24	334.00	CN	R_8

## Tab 10 - Allocation Factors



Oregon General Rate Case  
Pro Forma Factors December 31, 2023  
2020 Protocol Factors

OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL  
FACTOR

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC-UPL	OTHER	NON-UTILITY	Page Ref.
Sioux	-	-	-	-	-	-	-	-	-	Sioux
System Generation	1,463.4%	26,001.8%	7,818.5%	44,543.7%	5,989.4%	14,154.1%	0.292%	0.0000%	0.0000%	Pg 10.16
Divisional Generation - Pac. Power	3,112.9%	55,308.9%	16,630.9%	0.0000%	0.0000%	24,947.4%	0.0000%	0.0000%	0.0000%	Pg 10.16
Divisional Generation - R.M.P.	0.0000%	0.0000%	0.0000%	84,063.6%	11,303.3%	4,578.0%	0.0551%	0.0000%	0.0000%	Pg 10.16
System Capacity	1,482.9%	26,362.3%	7,979.8%	44,532.5%	5,857.2%	13,757.8%	0.0276%	0.0000%	0.0000%	Pg 10.16
System Energy	1,404.9%	24,920.1%	7,334.5%	44,577.1%	6,386.2%	15,343.3%	0.0338%	0.0000%	0.0000%	Pg 10.16
System Overhead	2,202.7%	27,125.2%	7,662.2%	44,040.1%	5,830.5%	13,118.7%	0.0205%	0.0000%	0.0000%	Pg 10.7
Gross Plant-System	2,202.7%	27,125.2%	7,662.2%	44,040.1%	5,830.5%	13,118.7%	0.0205%	0.0000%	0.0000%	Pg 10.6
System Net Plant	2,080.9%	25,548.6%	7,442.4%	45,868.8%	5,909.1%	13,118.6%	0.0209%	0.0106%	0.0000%	Pg 10.6
System Net Plant Distribution	3,540.2%	26,472.6%	6,394.1%	48,678.8%	5,312.8%	9,601.4%	0.0000%	0.0000%	0.0000%	Pg 10.5
Customer - System	2,344.0%	30,989.9%	6,844.2%	48,298.0%	7,281.2%	9,601.4%	0.0000%	0.0000%	0.0000%	Pg 10.10
CIAC	3,540.2%	26,472.6%	6,394.1%	48,678.8%	5,312.8%	9,601.4%	0.0000%	0.0000%	0.0000%	Pg 10.10
Bad Debt Expense	2,044.5%	48,435.6%	14,727.2%	28,660.6%	5,398.6%	0.725%	0.0000%	0.0000%	0.0000%	Pg 10.9
Accumulated Investment Tax Credit 1984	3,287.0%	70,976.0%	14,180.0%	0.0000%	0.0000%	10,946.0%	0.0000%	0.0000%	0.6110%	Fixed
Accumulated Investment Tax Credit 1985	5,420.0%	67,690.0%	13,360.0%	0.0000%	0.0000%	11,610.0%	0.0000%	0.0000%	1.9200%	Fixed
Accumulated Investment Tax Credit 1986	4,789.0%	64,680.0%	13,128.0%	0.0000%	0.0000%	15,500.0%	0.0000%	0.0000%	1.9770%	Fixed
Accumulated Investment Tax Credit 1987	4,270.0%	61,200.0%	14,960.0%	0.0000%	0.0000%	16,710.0%	0.0000%	0.0000%	2.8600%	Fixed
Accumulated Investment Tax Credit 1988	4,880.6%	56,355.6%	15,268.8%	0.0000%	0.0000%	20,677.6%	0.0000%	0.0000%	2.8172%	Fixed
Accumulated Investment Tax Credit 1989	1,504.7%	15,935.6%	3,913.2%	46,935.5%	13,981.5%	17,343.5%	0.0000%	0.0000%	0.3860%	Fixed
Accumulated Investment Tax Credit 1990	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	100.0000%	0.0000%	Sioux
Other Electric	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	Sioux
Non-Utility	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	100.0000%	Sioux
System Net Steam Plant	1,469.9%	26,116.1%	7,766.6%	44,327.5%	6,074.3%	14,216.3%	0.0293%	0.0000%	0.0000%	Pg 10.3
System Net Transmission Plant	1,463.4%	26,001.8%	7,818.5%	44,543.7%	5,989.4%	14,154.1%	0.0292%	0.0000%	0.0000%	Pg 10.4
System Net Production Plant	1,500.7%	24,208.7%	7,993.4%	45,567.0%	6,158.0%	14,514.1%	0.0299%	0.0283%	0.0000%	Pg 10.4
System Net Hydro Plant	1,458.9%	25,921.3%	7,794.3%	44,405.8%	5,970.9%	14,110.2%	0.0291%	0.3095%	0.0000%	Pg 10.4
System Net Other Production Plant	1,520.3%	23,120.5%	8,122.1%	46,281.0%	6,222.0%	14,703.7%	0.0303%	0.0000%	0.0000%	Pg 10.4
System Net General Plant	2,676.5%	28,015.7%	6,309.5%	41,919.3%	6,524.3%	14,542.9%	0.0119%	0.0000%	0.0000%	Pg 10.5
System Net Intangible Plant	1,882.3%	26,591.8%	7,774.6%	43,614.8%	6,370.5%	13,744.6%	0.0214%	0.0000%	0.0000%	Pg 10.6
Trojan Plant Allocator	1,454.5%	25,837.5%	7,745.0%	44,548.7%	6,049.7%	14,334.7%	0.0299%	0.0000%	0.0000%	Pg 10.12
Trojan Decommissioning Allocator	1,453.0%	25,808.4%	7,732.0%	44,549.6%	6,060.3%	14,366.6%	0.0300%	0.0000%	0.0000%	Pg 10.12
DIT Balance	2,188.4%	24,503.3%	6,152.7%	44,630.0%	5,915.4%	14,588.2%	0.2075%	0.0000%	1.8144%	Pg 10.9
Tax Depreciation	1,901.9%	26,409.7%	4,441.9%	44,960.0%	5,844.5%	13,287.5%	0.0237%	0.0000%	3.1308%	Pg 10.13
SCHMAT Depreciation Expense	1,772.8%	22,600.2%	6,654.0%	38,057.8%	5,043.6%	11,632.7%	0.0196%	14.2193%	0.0000%	Pg 10.12
System Generation Cholla Transaction	1,463.9%	26,009.4%	7,820.8%	44,556.7%	5,991.2%	14,156.2%	0.0000%	0.0000%	0.0000%	Pg 10.2

CALCULATION OF INTERNAL FACTORS  
Pro Forma Factors December 31, 2023

DESCRIPTION OF FACTOR

STEAM:  
STEAM PRODUCTION PLANT

DESCRIPTION OF FACTOR	TOTAL	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
S	0	0	0	0	0	0	0	0	0	0
DGP	0	0	0	0	0	0	0	0	0	0
DGU	0	0	0	0	0	0	0	0	0	0
SG	6,945,577,158	101,643,915	1,805,972,380	543,038,702	3,093,814,818	415,998,880	983,080,811	2,026,662	0	0

OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL  
FACTOR

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC-UPL	OTHER	NON-UTILITY Page Ref.
SSGCH	0	1,805,972,380	543,039,702	3,093,814,818	415,998,880	983,080,811	2,026,652	0	0
LESS ACCUMULATED DEPRECIATION									
S	(9,098,547)	0	(1,784,808)	(8,526,815)	1,213,075	0	0	0	0
DGP	(749,221,847)	(194,810,875)	(68,577,883)	(333,730,891)	(44,873,945)	-106,045,272	(218,616)	0	0
DGU	(719,880,716)	(1,0534,977)	(56,283,848)	(320,661,275)	(43,116,586)	-101,882,312	(210,054)	0	0
SG	(3,397,616,381)	(883,440,095)	(265,642,515)	(1,613,422,955)	(203,497,071)	-480,900,491	(991,391)	0	0
SG-W	0	0	0	0	0	0	0	0	0
SSGCH	0	0	0	0	0	0	0	0	0
	(4,875,817,492)	(1,285,432,634)	(382,289,055)	(2,176,341,936)	(280,274,527)	(888,838,076)	(1,420,061)	0	0
TOTAL NET STEAM PLANT									
SNPPS	30,422,711	540,539,746	160,750,647	917,472,883	125,724,353	284,242,735	606,591	0	0
SYSTEM NET PLANT PRODUCTION STEAM	1.4689%	26.1161%	7.7666%	44.3275%	6.0743%	14.2163%	0.0293%	0.0000%	0.0000%
<b>NUCLEAR:</b>									
NUCLEAR PRODUCTION PLANT									
DGP	0	0	0	0	0	0	0	0	0
DGU	0	0	0	0	0	0	0	0	0
SG	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0
LESS ACCUMULATED DEPRECIATION									
TOTAL NUCLEAR PLANT									
SNPPN	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
SYSTEM NET PLANT PRODUCTION NUCLEAR									
<b>HYDRO:</b>									
HYDRO PRODUCTION PLANT									
S	2,104,465	0	0	0	0	0	0	2,104,465	0
DGP	(169,356,335)	(44,035,630)	(13,241,119)	(75,437,523)	(10,143,440)	(23,970,789)	(49,417)	0	0
DGU	(31,496,322)	(460,928)	(8,180,598)	(14,029,617)	(1,866,443)	(4,458,007)	(9,190)	0	0
SG	(340,928,953)	(4,989,269)	(88,647,552)	(151,862,260)	(20,419,622)	(48,255,272)	(89,480)	0	0
	(539,677,146)	(7,928,615)	(140,872,760)	(241,329,401)	(32,449,505)	(76,884,067)	(158,087)	2,104,465	0
LESS ACCUMULATED DEPRECIATION (incl hydro amortization)									
TOTAL NET HYDRO PRODUCTION PLANT									
SNPPH	679,916,860	9,919,335	176,243,160	301,922,502	40,596,943	95,937,939	197,779	2,104,465	0
SYSTEM NET PLANT PRODUCTION HYDRO	100.0000%	1.4588%	7.7943%	44.4058%	5.9709%	14.1102%	0.0291%	0.3095%	0.0000%
<b>OTHER:</b>									
OTHER PRODUCTION PLANT (EXCLUDES EXPERIMENTAL)									
TOTAL	17,847,949	317,115,920	95,353,914	543,251,903	73,046,448	172,622,006	355,866	0	0
	1,219,594,006	17,847,949	317,115,920	543,251,903	73,046,448	172,622,006	355,866	0	0

2020 PROTOCOL  
FACTOR

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC-UPL	OTHER	NON-UTILITY Page Ref.
S	748,763	390,301	0	358,462	0	0	0	0	0
DGP & DGU	0	0	0	0	0	0	0	0	0
SG	5,292,321,711	1,376,096,848	413,779,984	2,357,394,204	316,978,684	749,078,126	1,544,248	0	0
SSGCT	0	0	0	0	0	0	0	0	0
	5,293,070,474	1,376,487,150	413,779,984	2,357,752,665	316,978,684	749,078,126	1,544,248	0	0
LESS ACCUMULATED DEPRECIATION									
S	(183,200,250)	(183,195,467)	0	(4,783)	0	0	0	0	0
DGP	202,224,324	2,959,419	15,810,902	90,078,131	12,112,038	28,622,942	59,007	0	0
DGU	0	0	0	0	0	0	0	0	0
SG	(570,089,603)	(6,342,883)	(44,572,435)	(253,988,819)	(34,144,986)	(80,690,796)	(166,347)	0	0
SSGCT	(43,837,829)	(11,398,608)	(3,427,459)	(19,526,977)	(2,625,626)	(6,204,830)	(12,791)	0	0
	(594,903,358)	(6,025,002)	(32,188,993)	(183,392,448)	(24,658,574)	(86,272,684)	(120,131)	0	0
TOTAL NET OTHER PRODUCTION PLANT	4,688,167,116	1,086,241,624	381,590,991	2,174,360,217	292,320,109	690,805,441	1,424,117	0	0
SNPP	100.0000%	1.5203%	23.1205%	46.2810%	6.2220%	14.7037%	0.0303%	0.0000%	0.0000%
SYSTEM NET PLANT PRODUCTION OTHER									

PRODUCTION:  
TOTAL PRODUCTION PLANT

	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
S	748,763	390,301	0	358,462	0	0	0	0	0
DGP & DGU	0	0	0	0	0	0	0	0	0
SG	13,457,492,875	3,499,185,148	1,062,173,600	5,994,460,925	806,024,012	1,904,780,942	3,926,765	0	0
SSGCH	0	0	0	0	0	0	0	0	0
SSGCT	0	0	0	0	0	0	0	0	0
	13,468,241,637	3,499,575,460	1,062,173,600	5,994,819,387	806,024,012	1,904,780,942	3,926,765	0	0
LESS ACCUMULATED DEPRECIATION									
S	(190,194,333)	(183,195,467)	(1,784,808)	(8,531,598)	1,213,075	0	0	2,104,465	0
DGP	0	0	0	0	0	0	0	0	0
DGU	0	0	0	0	0	0	0	0	0
SG	(5,820,203,663)	(85,174,820)	(455,052,416)	(2,692,532,187)	(348,595,692)	(823,794,827)	(1,698,279)	0	0
SSGCH	0	0	0	0	0	0	0	0	0
SSGCT	0	0	0	0	0	0	0	0	0
	(6,010,397,996)	(1,696,550,919)	(456,837,223)	(2,801,063,785)	(347,382,607)	(823,794,827)	(1,698,279)	2,104,465	0
TOTAL NET PRODUCTION PLANT	7,447,843,642	1,803,024,530	595,336,376	3,393,755,602	458,641,405	1,080,986,115	2,228,486	2,104,465	0
SNPP	100.0000%	1.5007%	24.2087%	45.5670%	6.1560%	14.5141%	0.0289%	0.0283%	0.0000%
SYSTEM NET PRODUCTION PLANT									

TRANSMISSION:  
TRANSMISSION PLANT

	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
DGP	0	0	0	0	0	0	0	0	0
DGU	0	0	0	0	0	0	0	0	0
SG	8,042,074,296	117,690,423	2,091,080,946	628,769,292	481,672,556	1,138,278,619	2,346,599	0	0
	8,042,074,296	117,690,423	2,091,080,946	628,769,292	481,672,556	1,138,278,619	2,346,599	0	0
LESS ACCUMULATED DEPRECIATION									
DGP	(353,157,214)	(91,827,095)	(27,611,584)	(157,309,176)	(21,152,023)	(49,986,066)	(103,048)	0	0
DGU	(426,788,101)	(110,972,422)	(33,368,412)	(190,107,074)	(25,862,076)	(60,407,822)	(124,533)	0	0
SG	(1,394,469,745)	(20,407,140)	(382,586,692)	(109,026,587)	(621,147,971)	(83,520,468)	(406,893)	0	0
	(2,174,415,059)	(31,821,122)	(565,386,209)	(170,006,584)	(896,584,221)	(307,767,903)	(634,473)	0	0
TOTAL NET TRANSMISSION PLANT	5,867,659,236	85,869,301	1,525,694,737	458,762,728	351,437,989	830,511,715	1,712,126	0	0
SNPT	100.0000%	1.4634%	26.0018%	7.8185%	5.9894%	14.1541%	0.0292%	0.0000%	0.0000%
SYSTEM NET PLANT TRANSMISSION									

OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL  
FACTOR

NON-UTILITY Page Ref.

DESCRIPTION

OTHER

FERC-UPL

Wyoming

Idaho

Utah

Washington

Oregon

California

TOTAL

FERC

Wyoming

Idaho

Utah

Washington

Oregon

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TOTAL

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OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL  
FACTOR

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC-UPL	OTHER	NON-UTILITY Page Ref.
GENERAL MINING PLANT	712,884	12,644,903	3,721,671	22,619,189	3,240,444	7,785,465	17,155		
LESS ACCUMULATED DEPRECIATION	0	0	0	0	0	0	0		
<b>SNPM</b>	<b>712,884</b>	<b>12,644,903</b>	<b>3,721,671</b>	<b>22,619,189</b>	<b>3,240,444</b>	<b>7,785,465</b>	<b>17,155</b>		
SYSTEM NET PLANT MINING	1.4049%	24.9201%	7.3345%	44.5771%	6.3862%	15.3433%	0.0388%		
<b>TOTAL</b>	<b>712,884</b>	<b>12,644,903</b>	<b>3,721,671</b>	<b>22,619,189</b>	<b>3,240,444</b>	<b>7,785,465</b>	<b>17,155</b>		

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC
INTANGIBLE PLANT	481,167	4,609,463	2,036,986	(26,172,704)	4,369,593	5,529,866	0
DGP	0	0	0	0	0	0	0
DGU	0	0	0	0	0	0	0
SE	(94,323)	(16,029)	(4,718)	(28,673)	(4,108)	(9,569)	(22)
SG	213,633,287	5,007,658	14,621,522	103,180,524	9,063,664	15,555,115	0
SO	397,257,319	5,813,597	31,059,549	176,952,980	23,793,357	56,228,019	115,916
SSGCT	476,788,634	10,502,382	36,532,406	209,978,294	27,799,391	62,548,427	97,817
SSGCH	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>21,803,901</b>	<b>303,422,053</b>	<b>84,245,746</b>	<b>463,910,421</b>	<b>65,021,898</b>	<b>139,851,558</b>	<b>213,711</b>

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC
INTANGIBLE PLANT	(8,850)	(140,175)	(15,414)	31,928,632	(1,020,506)	(399,756)	0
DGP	0	0	0	0	0	0	0
DGU	(397,058)	(103,242)	(31,044)	(176,864)	(23,781)	(56,200)	(116)
SE	84,709	21,110	6,213	37,761	5,410	12,987	29
SG	(182,729,117)	(56,627,623)	(12,506,374)	(86,254,439)	(7,752,516)	(13,304,914)	0
SO	(240,029,881)	(62,411,996)	(18,766,728)	(106,918,113)	(14,376,366)	(33,973,961)	(70,038)
SSGCT	(339,134,793)	(91,991,024)	(25,985,120)	(149,355,375)	(19,773,418)	(44,490,045)	(69,576)
SSGCH	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>(731,862,209)</b>	<b>(211,252,951)</b>	<b>(57,298,467)</b>	<b>(312,738,399)</b>	<b>(42,941,177)</b>	<b>(82,211,879)</b>	<b>(139,702)</b>

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC
GENERAL MINING PLANT	6,524,266	92,168,102	26,947,279	151,172,022	22,080,721	47,639,679	74,009
LESS ACCUMULATED AMORTIZATION	1.8823%	26.5918%	7.7746%	43.6148%	6.3705%	13.7446%	0.0214%
<b>TOTAL NET INTANGIBLE PLANT</b>	<b>346,607,078</b>	<b>1,882,331</b>	<b>7,774,667</b>	<b>43,614,874</b>	<b>6,370,554</b>	<b>13,744,667</b>	<b>74,009</b>

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
PRODUCTION PLANT	196,941,482	3,499,575,450	1,052,173,600	5,994,819,387	806,024,012	1,904,780,942	3,926,765	0	0
TRANSMISSION PLANT	117,690,423	2,091,080,946	628,769,292	3,562,234,862	481,672,556	1,138,278,619	2,346,599	0	0
DISTRIBUTION PLANT	8,432,050,664	2,484,208,127	619,411,435	3,671,327,019	444,343,741	870,561,561	0	0	0
GENERAL PLANT	1,552,444,712	454,571,611	110,457,270	628,616,683	101,555,584	218,402,432	193,526	0	0
INTANGIBLE PLANT	21,803,901	303,422,053	84,245,746	463,910,421	65,021,898	139,851,558	213,711	0	0
<b>TOTAL GROSS PLANT</b>	<b>717,282,193</b>	<b>8,832,865,186</b>	<b>2,495,057,342</b>	<b>14,340,908,371</b>	<b>1,898,617,791</b>	<b>4,271,876,112</b>	<b>6,680,600</b>	<b>0</b>	<b>0</b>
<b>GPS</b>	<b>2.2027%</b>	<b>27.1252%</b>	<b>7.6622%</b>	<b>44.0401%</b>	<b>5.8305%</b>	<b>13.1187%</b>	<b>0.0205%</b>	<b>0.0000%</b>	<b>0.0000%</b>

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
ACCUMULATED DEPRECIATION AND AMORTIZATION	(6,010,397,996)	(1,696,550,919)	(456,837,223)	(2,601,063,785)	(347,392,607)	(823,794,827)	(1,698,279)	2,104,465	0
PRODUCTION PLANT	(2,174,415,059)	(565,386,209)	(170,006,564)	(668,564,221)	(130,234,566)	(307,767,903)	(634,473)	0	0
TRANSMISSION PLANT	(3,288,139,572)	(1,122,481,268)	(290,502,417)	(1,167,331,507)	(171,095,298)	(376,673,352)	0	0	0
DISTRIBUTION PLANT	(594,338,157)	(167,722,414)	(49,485,416)	(225,636,768)	(39,116,260)	(78,659,768)	(68,012)	0	0
GENERAL PLANT	0	0	0	0	0	0	0	0	0

OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL  
FACTOR

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC-UPL	OTHER	NON-UTILITY Page Ref.
INTANGIBLE PLANT	(731,862,209) (12,798,152,993)	(211,252,951) (3,763,393,762)	(57,298,467) (1,024,130,087)	(312,738,399) (5,275,334,680)	(42,941,177) (730,733,868)	(92,211,879) (1,679,107,929)	(139,702) (2,540,466)	0 2,104,465	0 0
NET PLANT	19,764,127,603	5,049,464,425	1,470,927,255	9,065,573,691	1,167,893,924	2,592,768,183	4,140,135	2,104,465	0
SNP	100.0000%	25.5486%	7.4424%	45.8688%	5.9091%	13.1186%	0.0209%	0.0106%	0.0000%
SYSTEM NET PLANT FACTOR (SNP)									
NON-UTILITY RELATED INTEREST PERCENTAGE									
INT	100.0000%	25.5486%	7.4424%	45.8688%	5.9091%	13.1186%	0.0209%	0.0106%	0.0000%
INTEREST FACTOR SNP - NON-UTILITY									
TOTAL GROSS PLANT (LESS SO FACTOR)	31,679,767,243	8,593,203,336	2,427,360,954	13,951,808,016	1,847,104,119	4,155,970,726	6,499,341	0	0
SO									
SYSTEM OVERHEAD FACTOR (SO)	100.0000%	27.1252%	7.6622%	44.0401%	5.8305%	13.1187%	0.0209%	0.0000%	0
IBT									
INCOME BEFORE TAXES									
INCOME BEFORE STATE TAXES	47,886,245	(80,786,407)	22,633,034	203,887,147	24,256,387	(45,103,380)	11,270,132	(55,504,266)	(42,974,066)
Interest Synchronization	(3,332,499)							(3,332,656)	157
	44,553,746	(80,786,407)	22,633,034	203,887,147	24,256,387	(45,103,380)	11,270,132	(58,836,921)	(42,973,909)
INCOME BEFORE TAXES (FACTOR)	100.0000%	-181.3231%	50.7993%	457.6196%	54.4429%	-101.2334%	25.2955%	-132.0580%	-96.4539%
See Calculation of EXCTAX									
DITEXP:									
Pacific Power									
Production	0	0	0	0	0	0	0	0	0
S	0	0	0	0	0	0	0	0	0
Transmission	0	0	0	0	0	0	0	0	0
S	0	0	0	0	0	0	0	0	0
Distribution	0	0	0	0	0	0	0	0	0
S	0	0	0	0	0	0	0	0	0
General	0	0	0	0	0	0	0	0	0
S	0	0	0	0	0	0	0	0	0
Mining Plant	0	0	0	0	0	0	0	0	0
Non-Utility	0	0	0	0	0	0	0	0	0
NUTIL									
Total Pacific Power	0	0	0	0	0	0	0	0	0
Rocky Mountain Power									
Production	0	0	0	0	0	0	0	0	0
S	0	0	0	0	0	0	0	0	0
Transmission	0	0	0	0	0	0	0	0	0
S	0	0	0	0	0	0	0	0	0
Distribution	0	0	0	0	0	0	0	0	0
S	0	0	0	0	0	0	0	0	0
General	0	0	0	0	0	0	0	0	0
S	0	0	0	0	0	0	0	0	0
Mining Plant	0	0	0	0	0	0	0	0	0
Non-Utility	0	0	0	0	0	0	0	0	0
NUTIL									

OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL  
FACTOR

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC-UPL	OTHER	NON-UTILITY Page Ref.
Total Rocky Mountain Power	0	0	0	0	0	0	0	0	0
PC (Post Merger)									
Prod / Other Prod	0	0	0	0	0	0	0	0	0
Cholla Unit 4	0	0	0	0	0	0	0	0	0
Gasby Unit 4, 5 & 6	0	0	0	0	0	0	0	0	0
Hydro-PPL	0	0	0	0	0	0	0	0	0
Hydro-UPL	0	0	0	0	0	0	0	0	0
Transmission	0	0	0	0	0	0	0	0	0
Distribution	0	0	0	0	0	0	0	0	0
General/ Intangibles	0	0	0	0	0	0	0	0	0
Mining	0	0	0	0	0	0	0	0	0
WCA - CAEE 2007+	0	0	0	0	0	0	0	0	0
WCA - CAGE 2007+	0	0	0	0	0	0	0	0	0
WCA - CAGW 2007+	0	0	0	0	0	0	0	0	0
WCA_CAGW 2007+ -Marengo	0	0	0	0	0	0	0	0	0
WCA CAGW 2007+ -Goodnoe	0	0	0	0	0	0	0	0	0
WCA - General 2007+	0	0	0	0	0	0	0	0	0
WCA - JBG 2007+	0	0	0	0	0	0	0	0	0
Non Utility	0	0	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Total PC (Post Merger)	0	0	0	0	0	0	0	0	0
Total Deferred Taxes	0	0	0	0	0	0	0	0	0

Total PC (Post Merger)

Total Deferred Taxes

Percentage of Total (DITEXP)

0.00000%	0.00000%	0.00000%	0.00000%	0.00000%	0.00000%	0.00000%	0.00000%	0.00000%	0.00000%
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**DITBAL :**

	TOTAL	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
Pacific Power	(4,349,402)	468,901	1,431,767	1,826,359	(7,592,625)	(152,348)	(325,385)	(6,071)	0	0
Production	8,160,089	325,899	4,555,414	1,265,919	209,709	(14,833)	1,818,110	(128)	0	0
Transmission	(2,545,761)	721,849	(632,519)	1,147,165	(3,360,768)	(10,960)	(410,530)	0	0	0
Distribution	(805,521)	(2,953)	(302,710)	(11,031)	(344,410)	(8,276)	(135,909)	(232)	0	0
General	5,219	80	1,311	400	2,226	329	865	9	0	0
Mining Plant	(2,416,451)	0	0	0	0	0	0	0	0	(2,416,451)
Non Utility	(1,951,628)	1,513,776	5,053,262	4,228,811	(11,085,868)	(186,088)	947,152	(6,422)	0	(2,416,451)
Total Pacific Power	4,159,394	(63,931)	(5,488,678)	(343,345)	10,521,820	1,445,542	(2,039,523)	128,509	0	0
Rocky Mountain Power	18,500,801	(1,678)	(227,196)	(8,199)	16,181,239	1,940,549	528,149	87,737	0	0
Production	19,040,430	374,205	2,325,142	706,648	12,714,298	1,606,235	1,315,902	0	0	0
Transmission	(1,273,079)	(19,808)	(376,417)	(71,848)	(485,829)	(111,007)	(197,220)	(949)	0	0
Distribution	(7,460)	(100)	(1,843)	(572)	(3,447)	(525)	(983)	10	0	0
General	288,688	0	0	0	0	0	0	0	0	0
Mining Plant	40,419,886	288,688	(3,771,992)	282,683	38,918,080	4,880,794	(393,675)	215,307	0	0
Non-Utility Plant										
Total Rocky Mountain Power										



**OREGON GENERAL RATE CASE**  
**Pro Forma Factors December 31, 2023**

**2020 PROTOCOL  
FACTOR**

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC-UPL	OTHER	NON-UTILITY Page Ref.
PacifiCorp									
Prod / Other Prod	201,415,866	56,780,026	16,384,713	82,579,284	11,194,505	30,219,812	683,471	0	0
Cholla Unit 4	65,295	17,220	(0)	27,627	3,672	10,105	197	0	5,439
Gadsby Unit 4, 5 & 6	5,076,586	78,501	(1,099)	2,209,563	292,174	750,146	12,047	0	423,891
Hydro-PP	20,412,703	388,320	1,728,089	8,083,112	1,081,951	2,993,791	65,006	0	0
Hydro-UPL	6,209,185	124,985	540,490	2,459,238	323,887	893,095	17,816	0	0
Transmission	173,854,203	3,144,070	14,199,142	70,350,661	9,377,231	25,660,293	532,654	0	0
Distribution	669,013,369	23,441,538	43,421,752	314,080,996	32,825,482	65,737,809	0	0	4,661
General/Intangibles	5,218,463	151,692	266,134	1,255,673	275,029	964,216	40,703	0	0
Mining	1,966	29	151	841	126	325	1	0	0
WCA - CAEE 2007+	(3,001)	(18)	(706)	(1,162)	(187)	(467)	(1)	0	(460)
WCA - CAGE 2007+	1,519,765,498	23,833,468	(423,655)	648,356,473	86,254,785	228,821,189	3,586,383	0	129,224,194
WCA - CAGW 2007+	373,581,042	5,880,824	80,287,813	158,412,485	21,176,359	55,701,373	873,362	0	(47,643,502)
WCA_CAGW 2007+ -Marengo	(51,824,378)	0	0	(51,824,378)	0	0	0	0	0
WCA CAGW 2007+ -Goodnoe	(8,496,801)	0	0	0	0	0	0	0	(8,496,801)
WCA - General 2007+	144,948,307	3,178,224	9,759,863	62,280,350	8,220,362	19,878,392	145,604	0	1,575,422
WCA - IBG 2007+	107,482,603	1,696,346	23,592,642	46,432,527	6,208,145	16,479,778	216,010	0	(15,723,508)
Oregon Extra Book Depreciation	(123,478,470)	0	(123,478,470)	0	0	0	0	0	0
Non Utility	(5,039,652)	0	(5,039,652)	0	0	0	0	0	0
<b>Total PC (Post Merger)</b>	<b>3,038,203,288</b>	<b>65,503,072</b>	<b>184,716,992</b>	<b>1,344,773,290</b>	<b>177,235,521</b>	<b>448,109,855</b>	<b>6,173,251</b>	<b>0</b>	<b>59,369,238</b>
Total Deferred Taxes	3,076,671,345	67,305,536	189,228,486	1,372,605,502	181,930,228	448,663,332	6,382,136	0	56,952,786
Percentage of Total (DITBAL)	100.0000%	2.1876%	6.1504%	44.6133%	5.9132%	14.5828%	0.2074%	0.0000%	1.8511%

**OPRV-WY**

Total Sales to Ultimate Customers	Pacific Division	Utah Division	Combined Total
	0	0	0
Less: Uncollectibles (net)	0	0	0
Total Interstate Revenues	0	0	0
	0.0000%	0.0000%	0.0000%

**OPRV-ID**

Total Sales to Ultimate Customers	Pacific Division	Utah Division	Combined Total
	0	0	0
Less: Interstate Sales for Resale	0	0	0
Montana Power	0	0	0
Portland General Electric	0	0	0
Puget Sound Power & Light	0	0	0
Washington Water Power Co.	0	0	0
Less: Uncollectibles (net)	0	0	0
Total Interstate Revenues	0	0	0
	0.0000%	0.0000%	0.0000%

OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL  
FACTOR

DESCRIPTION	California		Oregon		Washington		Utah		Idaho		Wyoming		FERC-UPL		OTHER		NON-UTILITY Page Ref.	
	<u>California</u>	<u>Oregon</u>	<u>Washington</u>	<u>Utah</u>	<u>Idaho</u>	<u>Wyoming</u>	<u>FERC</u>	<u>Other</u>	<u>Non-Utility</u>									
<b>BADDEBT</b>																		
Account 904 Balance	267,410	6,335,251	1,926,280	3,748,735	706,251	0	0	0	0	0	0	0	0	0	0	0	0	0
Bad Debts Expense Allocation Factor - BADDEBT	2.0445%	48.4356%	14.7272%	28.6606%	5.3996%	0.7325%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
<b>Customer Factors</b>																		
<b>TOTAL</b>																		
Total Electric Customers	47,782	631,708	139,515	984,520	86,483	148,423	0	0	0	0	0	0	0	0	0	0	0	0
<b>CN</b>																		
Customer System factor - CN	2.3440%	30.9899%	6.8442%	48.2980%	4.2426%	7.2812%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
Pacific Power Customers	47,782	631,708	139,515	0	0	131775.9167	0	0	0	0	0	0	0	0	0	0	0	0
<b>CNP</b>																		
Customer Service Pacific Power factor - CNP	5.0255%	66.4410%	14.6737%	0.0000%	0.0000%	13.8598%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
Rocky Mountain Power Customers	0	0	0	984,520	86,483	16,647	0	0	0	0	0	0	0	0	0	0	0	0
<b>CNU</b>																		
Customer Service R.M.P. factor - CNU	0.0000%	0.0000%	0.0000%	90.5181%	7.9514%	1.5305%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
<b>CIAC</b>																		
TOTAL NET DISTRIBUTION PLANT	182,107,211	1,361,726,859	328,909,018	2,503,995,512	273,284,484	483,888,009	0	0	0	0	0	0	0	0	0	0	0	0
CIAC FACTOR: Same as (SNPD Factor)	3.5402%	26.4726%	6.3941%	48.6788%	5.3128%	9.6014%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%

IDBIT	Idaho - PPL		Idaho - UPL		Idaho Total	
Payroll	0	0	0	0	0	0
Property	0	0	0	0	0	0
Sales	0	0	0	0	0	0

OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL  
FACTOR

California Oregon Washington Utah Idaho Wyoming FERC-UPL OTHER NON-UTILITY Page Ref.

Average

Idaho - PPL Factor	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Idaho - UPL Factor	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

EXCTAX  
Excise Tax (Superfund)

Total Taxable Income  
Less Other Electric Items:

419 OTH  
432 OTH  
40910 OTH  
SCHMDT OTH  
SCHMDT (Steam) OTH

TOTAL	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
29,965,289	9,744,331	(77,363,303)	21,605,494	194,630,670	23,155,147	(43,055,687)	10,758,468	(68,486,779)	(41,023,044)
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
29,965,289	9,744,331	(77,363,303)	21,605,494	194,630,670	23,155,147	(43,055,687)	10,758,468	(68,486,779)	(41,023,044)

Total Taxable Income Excluding Other

Excise Tax (Superfund) Factor - EXCTAX

100.00000%	32.5187%	-258.1763%	72.1017%	649.5202%	77.2732%	-143.8652%	35.9031%	-228.5536%	-136.9018%
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Trojan Allocators

Preminger  
Dec 1991 Plant  
Dec 1992 Plant  
Average

Dec 1991 Reserve

Dec 1992 Reserve

Average

Postmerger

Dec 1991 Plant

Dec 1992 Plant

Average

Dec 1991 Reserve

Dec 1992 Reserve

Average

Net Plant

Division Net Plant Nuclear Pacific Power

Division Net Plant Nuclear Rocky Mountain Power

System Net Nuclear Plant

TOTAL	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
16,918,976									
17,094,202									
17,006,589	248,880	4,422,013	1,329,660	7,575,359	1,018,594	2,407,122	4,862	0	0
(7,851,432)									
(6,434,030)									
(8,142,731)	(119,163)	(2,117,253)	(636,639)	(3,627,071)	(487,701)	(1,152,527)	(2,376)	0	0
4,284,960									
3,485,613									
3,885,287	56,859	1,010,243	303,771	1,730,649	232,706	549,926	1,134	0	0
(129,394)									
(240,609)									
(185,002)	(2,707)	(48,104)	(14,464)	(62,407)	(11,081)	(26,185)	(54)	0	0
12,564,143	183,868	3,266,898	982,327	5,596,530	752,518	1,778,336	3,666	0	0
100.00000%	1.4634%	26.0018%	7.8185%	44.5437%	5.9894%	14.1541%	0.0282%	0.0000%	0.0000%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
100.00000%	1.4634%	26.0018%	7.8185%	44.5437%	5.9894%	14.1541%	0.0282%	0.0000%	0.0000%

**OREGON GENERAL RATE CASE**  
**Pro Forma Factors December 31, 2023**

**2020 PROTOCOL  
FACTOR**

		2020 PROTOCOL FACTOR					FERC-UPL		NON-UTILITY		
		TOTAL	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
Pre-merger	(101)	17,084,202	250,162	4,444,784	1,336,510	7,614,385	1,023,841	2,419,523	4,988	0	0
	(108) SG	(8,434,030)	(123,426)	(2,192,996)	(659,414)	(3,756,826)	(505,148)	(1,193,757)	(2,461)	0	0
Post-merger	(101)	3,485,613	51,010	906,321	272,523	1,552,620	208,768	493,356	1,017	0	0
	(108) SG	(240,609)	(3,521)	(62,563)	(18,812)	(107,176)	(14,411)	(34,056)	(70)	0	0
	(107) SG	1,778,549	26,028	462,454	139,056	792,231	106,525	251,737	519	0	0
	(120) SE	1,975,759	27,758	492,362	144,913	880,736	126,175	303,147	668	0	0
	(228) SG	7,220,849	105,672	1,877,548	564,562	3,216,431	432,486	1,022,043	2,107	0	0
	(228) SG	1,472,376	21,547	382,844	115,118	655,850	88,187	208,401	430	0	0
	(228) SNPP	3,531,000	51,674	916,122	276,071	1,572,837	211,486	499,780	1,030	0	0
	(228) SE	1,743,025	24,488	434,364	127,843	776,990	111,312	267,438	589	0	0
Total Acct 182.22		29,626,734	431,392	7,663,249	2,298,368	13,198,078	1,789,220	4,237,610	8,817	0	0
Revised Study	(228)	112,680	1,649	29,299	8,810	50,192	6,749	15,949	33	0	0
	(228) SE	941,950	13,234	234,735	69,088	419,894	60,154	144,526	318	0	0
December 1993 Adj.		1,054,630	14,883	264,034	77,898	470,086	66,903	160,475	351	0	0
Adjusted Acct 182.22		30,681,364	446,275	7,927,283	2,376,266	13,668,164	1,856,123	4,398,085	9,168	0	0
TROJP		100.00000%	1.4545%	25.8375%	7.7450%	44.5487%	6.0497%	14.3347%	0.0289%	0.0000%	0.0000%
Trojan Plant Allocator											
Account 228.42											
Plant - Premierger	SG	7,220,849	105,672	1,877,548	564,562	3,216,431	432,486	1,022,043	2,107	0	0
- Postmerger	SG	1,472,376	21,547	382,844	115,118	655,850	88,187	208,401	430	0	0
Storage Facility	SE	1,743,025	24,488	434,364	127,843	776,990	111,312	267,438	589	0	0
Transition Costs	SNPP	3,531,000	51,674	916,122	276,071	1,572,837	211,486	499,780	1,030	0	0
Total Acct 228.42		13,967,250	203,382	3,612,878	1,083,593	6,222,109	843,471	1,997,661	4,156	0	0
Transition Costs	SNPP	112,680	1,649	29,299	8,810	50,192	6,749	15,949	33	0	0
Storage Facility	SE	941,950	13,234	234,735	69,088	419,894	60,154	144,526	318	0	0
December 1993 Adj.		1,054,630	14,883	264,034	77,898	470,086	66,903	160,475	351	0	0
Adjusted Acct 228.42		15,021,880	218,264	3,876,912	1,161,491	6,692,195	910,374	2,158,136	4,508	0	0
TROJD		100.00000%	1.4530%	25.8084%	7.7320%	44.5496%	6.0603%	14.3666%	0.0300%	0.0000%	0.0000%
Trojan Decommissioning Allocator											
SCHWA											
Amortization Expense :											
Amortization of Limited Term Plant	Acct 404	58,576,334	1,126,640	15,312,540	4,116,372	24,321,278	2,950,645	6,507,033	9,088	4,232,738	0
Amortization of Other Electric Plant	Acct 405	0	0	0	0	0	0	0	0	0	0
Amortization of Plant Acquisitions	Acct 406	2,091,631	26,195	465,430	139,951	1,088,965	107,210	253,357	522	0	0
Amort of Prop. Losses, Unrecovered Plant, etc.	Acct 407	20,747,188	14,073	18,579,233	75,187	1,760,413	57,587	136,113	281	124,280	0
Total Amortization Expense :		81,415,153	1,166,909	34,357,204	4,331,510	27,180,656	3,115,453	6,896,504	9,891	4,357,028	0
Schedule M Amortization Factor		100.00000%	1.4333%	42.2000%	5.3203%	33.3853%	3.8266%	8.4708%	0.0121%	5.3516%	0.0000%
SCHWD											
Depreciation Expense :											
Steam	Acct 403.1	626,491,403	6,523,041	115,899,032	34,849,800	198,546,858	26,696,902	63,089,622	130,061	180,756,088	0

OREGON GENERAL RATE CASE  
Pro Forma Factors December 31, 2023

2020 PROTOCOL

DESCRIPTION	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC-UPL	OTHER	NON-UTILITY Page Ref.
Nuclear	0	0	0	0	0	0	0	0	0
Acct 403.2	0	0	0	0	0	0	0	0	0
Hydro	505,045	8,973,457	2,698,238	15,372,447	2,067,002	4,884,700	10,070	0	0
Acct 403.3	505,045	8,973,457	2,698,238	15,372,447	2,067,002	4,884,700	10,070	0	0
Other	3,072,307	54,587,648	16,414,016	93,518,990	12,574,057	29,714,779	61,258	0	0
Acct 403.4	3,072,307	54,587,648	16,414,016	93,518,990	12,574,057	29,714,779	61,258	0	0
Transmission	2,022,459	35,934,325	10,805,129	61,559,162	8,277,335	19,560,845	40,325	0	0
Acct 403.5	2,022,459	35,934,325	10,805,129	61,559,162	8,277,335	19,560,845	40,325	0	0
Distribution	9,254,102	56,424,821	16,032,588	93,266,338	11,380,194	23,371,694	0	0	0
Acct 403.6	9,254,102	56,424,821	16,032,588	93,266,338	11,380,194	23,371,694	0	0	0
General	1,159,293	15,476,134	3,785,630	21,528,656	3,118,610	7,253,948	7,878	0	0
Acct 403.7&8	1,159,293	15,476,134	3,785,630	21,528,656	3,118,610	7,253,948	7,878	0	0
Mining	0	0	0	0	0	0	0	0	0
Acct 403.9	0	0	0	0	0	0	0	0	0
Experimental	0	0	0	0	0	0	0	0	0
Acct 403.4	0	0	0	0	0	0	0	0	0
<b>Total Depreciation Expense :</b>	22,536,247	287,295,417	84,565,402	483,792,451	64,114,101	147,875,587	249,592	180,756,088	0
<b>Schedule M Depreciation Factor</b>	1.7728%	22.6002%	6.6540%	38.0578%	5.0436%	11.6327%	0.0196%	14.2193%	0.0000%

Tax Depreciation by Function

Based on Tax Depreciation Schedule M Differences

Tax Depr factor

TOTAL	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC	Other	Non-Utility
1,383,505,094	26,312,380	365,379,467	61,454,508	622,023,458	80,859,265	183,833,144	328,367	-	43,314,704
100.0000%	1.9019%	26.4097%	4.4419%	44.9600%	5.8445%	13.2875%	0.0237%	0.0000%	3.1308%

Pro Forma Factors December 31, 2023  
 Oregon General Rate Case - December 2023  
 COINCIDENTAL PEAKS

			FORECAST LOADS (CP)								
			Non-FERC					FERC			
Month	Day	Time	CA	OR	WA	UT	ID	WY		Total	
Jan-23	12	8	148	2,655	838	3,495	469	1,223	33	8,861	
Feb-23	7	8	139	2,484	704	3,438	453	1,184	34	8,436	
Mar-23	9	8	135	2,379	674	3,295	437	1,167	34	8,120	
Apr-23	5	8	117	2,196	576	3,088	426	1,105	34	7,542	
May-23	16	16	113	1,917	577	4,075	545	1,095	22	8,344	
Jun-23	22	16	129	2,051	684	4,913	769	1,200	34	9,780	
Jul-23	17	16	140	2,409	760	5,176	783	1,237	35	10,541	
Aug-23	24	16	132	2,474	743	5,033	616	1,202	36	10,236	
Sep-23	7	16	116	2,161	660	4,673	556	1,146	36	9,348	
Oct-23	2	18	103	1,901	602	3,783	429	1,129	35	7,983	
Nov-23	22	18	122	2,196	695	3,730	466	1,236	34	8,479	
Dec-23	13	18	136	2,398	726	3,923	494	1,282	36	8,995	
			1,531	27,220	8,239	48,623	6,443	14,205	404	106,665	

- (less)

			Adjustments for Curtailments, Buy-Throughs and Load No Longer Served (Reductions to Load)								
			Non-FERC					FERC			
Month	Day	Time	CA	OR	WA	UT	ID	WY		Total	
Jan-23	12	8	-	-	-	120	-	-	30	150	
Feb-23	7	8	-	-	-	120	-	-	32	152	
Mar-23	9	8	-	-	-	120	-	-	32	152	
Apr-23	5	8	-	-	-	136	-	-	32	168	
May-23	16	16	-	-	-	282	-	-	21	303	
Jun-23	22	16	-	-	-	410	170	-	31	612	
Jul-23	17	16	-	-	-	439	146	-	32	617	
Aug-23	24	16	-	-	-	363	79	-	33	476	
Sep-23	7	16	-	-	-	415	-	-	34	449	
Oct-23	2	18	-	-	-	220	-	-	33	252	
Nov-23	22	18	-	-	-	162	-	-	32	194	
Dec-23	13	18	-	-	-	231	-	-	33	264	
			-	-	-	3,017	395	-	376	3,788	

= equals

			COINCIDENTAL PEAK SERVED FROM COMPANY RESOURCES								
			Non-FERC					FERC			
Month	Day	Time	CA	OR	WA	UT	ID	WY		Total	
Jan-23	12	8	148	2,655	838	3,375	469	1,223	3	8,711	
Feb-23	7	8	139	2,484	704	3,318	453	1,184	3	8,285	
Mar-23	9	8	135	2,379	674	3,175	437	1,167	2	7,967	
Apr-23	5	8	117	2,196	576	2,952	426	1,105	2	7,374	
May-23	16	16	113	1,917	577	3,793	545	1,095	1	8,042	
Jun-23	22	16	129	2,051	684	4,503	599	1,200	2	9,168	
Jul-23	17	16	140	2,409	760	4,737	637	1,237	3	9,924	
Aug-23	24	16	132	2,474	743	4,670	537	1,202	3	9,760	
Sep-23	7	16	116	2,161	660	4,258	556	1,146	2	8,899	
Oct-23	2	18	103	1,901	602	3,563	429	1,129	2	7,730	
Nov-23	22	18	122	2,196	695	3,569	466	1,236	2	8,286	
Dec-23	13	18	136	2,398	726	3,692	494	1,282	3	8,731	
			1,531	27,220	8,239	45,605	6,048	14,205	29	102,877	

+ plus

			Adjustments for Ancillary Services Contracts including Reserves and Direct Access (Additions to Load)								
			Non-FERC					FERC			
Month	Day	Time	CA	OR	WA	UT	ID	WY		Total	
Jan-23	12	8	-	-	-	30	-	-	-	30	
Feb-23	7	8	-	-	-	32	-	-	-	32	
Mar-23	9	8	-	-	-	32	-	-	-	32	
Apr-23	5	8	-	-	-	32	-	-	-	32	
May-23	16	16	-	-	-	21	-	-	-	21	
Jun-23	22	16	-	-	-	31	-	-	-	31	
Jul-23	17	16	-	-	-	32	-	-	-	32	
Aug-23	24	16	-	-	-	33	-	-	-	33	
Sep-23	7	16	-	-	-	34	-	-	-	34	
Oct-23	2	18	-	-	-	33	-	-	-	33	
Nov-23	22	18	-	-	-	32	-	-	-	32	
Dec-23	13	18	-	-	-	33	-	-	-	33	
			-	-	-	376	-	-	-	376	

= equals

			LOADS FOR JURISDICTIONAL ALLOCATION (CP)								
			Non-FERC					FERC			
Month	Day	Time	CA	OR	WA	UT	ID	WY		Total	
Jan-23	12	8	148	2,655	838	3,405	469	1,223	3	8,741	
Feb-23	7	8	139	2,484	704	3,350	453	1,184	3	8,316	
Mar-23	9	8	135	2,379	674	3,206	437	1,167	2	7,999	
Apr-23	5	8	117	2,196	576	2,984	426	1,105	2	7,406	
May-23	16	16	113	1,917	577	3,815	545	1,095	1	8,063	
Jun-23	22	16	129	2,051	684	4,534	599	1,200	2	9,199	
Jul-23	17	16	140	2,409	760	4,769	637	1,237	3	9,956	
Aug-23	24	16	132	2,474	743	4,703	537	1,202	3	9,793	
Sep-23	7	16	116	2,161	660	4,292	556	1,146	2	8,933	
Oct-23	2	18	103	1,901	602	3,596	429	1,129	2	7,763	
Nov-23	22	18	122	2,196	695	3,601	466	1,236	2	8,318	
Dec-23	13	18	136	2,398	726	3,726	494	1,282	3	8,764	
			1,531	27,220	8,239	45,981	6,048	14,205	29	103,253	

Pro Forma Factors December 31, 2023  
Oregon General Rate Case - December 2023  
ENERGY

		FORECAST LOADS (MWh)								
		Non-FERC						FERC		
Year	Month	CA	OR	WA	UT	ID	WY		Total	
2023	Jan	78,390	1,438,180	438,220	2,298,190	309,560	813,290	24,441	5,400,271	
2023	Feb	67,180	1,257,950	370,680	2,036,940	270,310	736,210	23,009	4,762,279	
2023	Mar	68,700	1,298,140	362,940	2,133,840	281,240	802,650	24,250	4,971,760	
2023	Apr	66,270	1,190,510	327,090	2,052,730	277,990	762,420	24,189	4,701,199	
2023	May	71,900	1,181,490	334,590	2,163,970	335,990	765,160	24,073	4,877,173	
2023	Jun	75,680	1,179,260	343,070	2,406,360	416,930	783,120	23,154	5,227,574	
2023	Jul	82,380	1,329,280	397,920	2,803,180	489,470	785,910	25,094	5,913,234	
2023	Aug	78,240	1,311,840	392,590	2,740,080	393,900	820,570	25,399	5,762,619	
2023	Sep	67,140	1,173,020	350,790	2,326,440	310,150	759,100	25,045	5,011,685	
2023	Oct	62,970	1,187,200	361,320	2,185,070	277,630	780,910	25,385	4,880,485	
2023	Nov	66,800	1,289,570	385,440	2,192,300	258,140	779,820	24,930	4,997,000	
2023	Dec	77,510	1,474,010	441,550	2,373,950	302,220	837,470	26,141	5,532,851	
		863,160	15,310,450	4,506,200	27,713,050	3,923,530	9,426,630	295,110	62,038,130	

- (less)

		Adjustments for Curtailments, Buy-Throughs and Load No Longer Served (Reductions to Load)								
		Non-FERC						FERC		
Year	Month	CA	OR	WA	UT	ID	WY		Total	
2023	Jan				40,887			22,398	63,286	
2023	Feb				29,486			21,260	50,746	
2023	Mar				49,314			22,559	71,873	
2023	Apr				53,861			22,741	76,602	
2023	May				61,346			22,610	83,956	
2023	Jun				69,444			21,664	91,108	
2023	Jul				67,466			23,098	90,564	
2023	Aug				64,707			23,408	88,114	
2023	Sep				56,427			23,468	79,894	
2023	Oct				42,252			23,815	66,067	
2023	Nov				30,615			23,240	53,855	
2023	Dec				34,268			24,079	58,347	
					600,072			274,339	874,411	

= equals

		LOADS SERVED FROM COMPANY RESOURCES (NPC)								
		Non-FERC						FERC		
Year	Month	CA	OR	WA	UT	ID	WY		Total	
2023	Jan	78,390	1,438,180	438,220	2,257,303	309,560	813,290	2,042	5,336,985	
2023	Feb	67,180	1,257,950	370,680	2,007,454	270,310	736,210	1,750	4,711,534	
2023	Mar	68,700	1,298,140	362,940	2,084,526	281,240	802,650	1,691	4,899,887	
2023	Apr	66,270	1,190,510	327,090	1,998,869	277,990	762,420	1,448	4,624,597	
2023	May	71,900	1,181,490	334,590	2,102,624	335,990	765,160	1,462	4,793,217	
2023	Jun	75,680	1,179,260	343,070	2,336,916	416,930	783,120	1,490	5,136,466	
2023	Jul	82,380	1,329,280	397,920	2,735,714	489,470	785,910	1,996	5,822,670	
2023	Aug	78,240	1,311,840	392,590	2,675,373	393,900	820,570	1,991	5,674,505	
2023	Sep	67,140	1,173,020	350,790	2,270,013	310,150	759,100	1,577	4,931,791	
2023	Oct	62,970	1,187,200	361,320	2,142,818	277,630	780,910	1,570	4,814,418	
2023	Nov	66,800	1,289,570	385,440	2,161,685	258,140	779,820	1,690	4,943,145	
2023	Dec	77,510	1,474,010	441,550	2,339,682	302,220	837,470	2,062	5,474,504	
		863,160	15,310,450	4,506,200	27,112,978	3,923,530	9,426,630	20,771	61,163,719	

+ plus

		Add: Resolute NTUA (UT) - Grossed up for Line Losses								
		Non-FERC						FERC		
Year	Month	CA	OR	WA	UT	ID	WY		Total	
2023	Jan				22,398				22,398	
2023	Feb				21,260				21,260	
2023	Mar				22,559				22,559	
2023	Apr				22,741				22,741	
2023	May				22,610				22,610	
2023	Jun				21,664				21,664	
2023	Jul				23,098				23,098	
2023	Aug				23,408				23,408	
2023	Sep				23,468				23,468	
2023	Oct				23,815				23,815	
2023	Nov				23,240				23,240	
2023	Dec				24,079				24,079	
					274,339				274,339	

= equals

		LOADS FOR JURISDICTIONAL ALLOCATION (MWh)								
		Non-FERC						FERC		
Year	Month	CA	OR	WA	UT	ID	WY		Total	
2023	Jan	78,390	1,438,180	438,220	2,279,701	309,560	813,290	2,042	5,359,384	
2023	Feb	67,180	1,257,950	370,680	2,028,714	270,310	736,210	1,750	4,732,794	
2023	Mar	68,700	1,298,140	362,940	2,107,086	281,240	802,650	1,691	4,922,447	
2023	Apr	66,270	1,190,510	327,090	2,021,609	277,990	762,420	1,448	4,647,338	
2023	May	71,900	1,181,490	334,590	2,125,235	335,990	765,160	1,462	4,815,827	
2023	Jun	75,680	1,179,260	343,070	2,358,580	416,930	783,120	1,490	5,158,130	
2023	Jul	82,380	1,329,280	397,920	2,758,812	489,470	785,910	1,996	5,845,768	
2023	Aug	78,240	1,311,840	392,590	2,698,781	393,900	820,570	1,991	5,697,913	
2023	Sep	67,140	1,173,020	350,790	2,293,481	310,150	759,100	1,577	4,955,259	
2023	Oct	62,970	1,187,200	361,320	2,166,633	277,630	780,910	1,570	4,838,233	
2023	Nov	66,800	1,289,570	385,440	2,184,924	258,140	779,820	1,690	4,966,385	
2023	Dec	77,510	1,474,010	441,550	2,363,761	302,220	837,470	2,062	5,498,583	
		863,160	15,310,450	4,506,200	27,387,317	3,923,530	9,426,630	20,771	61,438,058	

Pro Forma Factors December 31, 2023  
Oregon General Rate Case - December 2023

	CALIFORNIA	OREGON	WASHINGTON	UTAH	IDAHO	WYOMING	FERC	
Subtotal	863,160	15,310,450	4,506,200	27,387,317	3,923,530	9,426,630	20,771	<b>61,438,058</b> Ref Page 10.15_R
System Energy Factor	1.4049%	24.9201%	7.3345%	44.5771%	6.3862%	15.3433%	0.0338%	100.00%
Divisional Energy - Pacific	3.0320%	53.7809%	15.8289%	0.0000%	0.0000%	27.3581%	0.0000%	100.00%
Divisional Energy - Utah	0.0000%	0.0000%	0.0000%	83.0677%	11.9003%	4.9690%	0.0630%	100.00%
System Generation Factor	1.4634%	26.0018%	7.8185%	44.5437%	5.9894%	14.1541%	0.0292%	100.00%
Divisional Generation - Pacific	3.1129%	55.3089%	16.6309%	0.0000%	0.0000%	24.9474%	0.0000%	100.00%
Divisional Generation - Utah	0.0000%	0.0000%	0.0000%	84.0636%	11.3033%	4.5780%	0.0551%	100.00%
System Capacity (kw)								
Accord	1,531.2	27,219.8	8,239.4	45,981.0	6,047.7	14,205.1	28.5	<b>103,263</b> Ref Page 10.14_R
Modified Accord	1,531.2	27,219.8	8,239.4	45,981.0	6,047.7	14,205.1	28.5	<b>103,263</b> Ref Page 10.14_R
Rolled-In	1,531.2	27,219.8	8,239.4	45,981.0	6,047.7	14,205.1	28.5	<b>103,263</b> Ref Page 10.14_R
Rolled-In with Hydro Adj.	1,531.2	27,219.8	8,239.4	45,981.0	6,047.7	14,205.1	28.5	<b>103,263</b> Ref Page 10.14_R
Rolled-In with Off-Sys Adj.	1,531.2	27,219.8	8,239.4	45,981.0	6,047.7	14,205.1	28.5	<b>103,263</b> Ref Page 10.14_R
System Capacity Factor								
Accord	1.4829%	26.3623%	7.9798%	44.5325%	5.8572%	13.7576%	0.0276%	100.00%
Modified Accord	1.4829%	26.3623%	7.9798%	44.5325%	5.8572%	13.7576%	0.0276%	100.00%
Rolled-In	1.4829%	26.3623%	7.9798%	44.5325%	5.8572%	13.7576%	0.0276%	100.00%
Rolled-In with Hydro Adj.	1.4829%	26.3623%	7.9798%	44.5325%	5.8572%	13.7576%	0.0276%	100.00%
Rolled-In with Off-Sys Adj.	1.4829%	26.3623%	7.9798%	44.5325%	5.8572%	13.7576%	0.0276%	100.00%
System Energy (kwh)								
Accord	863,160	15,310,450	4,506,200	27,387,317	3,923,530	9,426,630	20,771	61,438,058
Modified Accord	863,160	15,310,450	4,506,200	27,387,317	3,923,530	9,426,630	20,771	61,438,058
Rolled-In	863,160	15,310,450	4,506,200	27,387,317	3,923,530	9,426,630	20,771	61,438,058
Rolled-In with Hydro Adj.	863,160	15,310,450	4,506,200	27,387,317	3,923,530	9,426,630	20,771	61,438,058
Rolled-In with Off-Sys Adj.	863,160	15,310,450	4,506,200	27,387,317	3,923,530	9,426,630	20,771	61,438,058
System Energy Factor								
Accord	1.4049%	24.9201%	7.3345%	44.5771%	6.3862%	15.3433%	0.0338%	100.00%
Modified Accord	1.4049%	24.9201%	7.3345%	44.5771%	6.3862%	15.3433%	0.0338%	100.00%
Rolled-In	1.4049%	24.9201%	7.3345%	44.5771%	6.3862%	15.3433%	0.0338%	100.00%
Rolled-In with Hydro Adj.	1.4049%	24.9201%	7.3345%	44.5771%	6.3862%	15.3433%	0.0338%	100.00%
Rolled-In with Off-Sys Adj.	1.4049%	24.9201%	7.3345%	44.5771%	6.3862%	15.3433%	0.0338%	100.00%
System Generation Factor								
Accord	1.4634%	26.0018%	7.8185%	44.5437%	5.9894%	14.1541%	0.0292%	100.00%
Modified Accord	1.4634%	26.0018%	7.8185%	44.5437%	5.9894%	14.1541%	0.0292%	100.00%
Rolled-In	1.4634%	26.0018%	7.8185%	44.5437%	5.9894%	14.1541%	0.0292%	100.00%
Rolled-In with Hydro Adj.	1.4634%	26.0018%	7.8185%	44.5437%	5.9894%	14.1541%	0.0292%	100.00%
Rolled-In with Off-Sys Adj.	1.4634%	26.0018%	7.8185%	44.5437%	5.9894%	14.1541%	0.0292%	100.00%



# **B1. REVENUE**



Electric Operations Revenue (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other	
4401000	RESIDENTIAL SALES	301100	RESIDENTIAL SALES	CA	49,219	49,219	-	-	-	-	-	
4401000	RESIDENTIAL SALES	301100	RESIDENTIAL SALES	IDU	83,945	-	-	-	-	83,945	-	
4401000	RESIDENTIAL SALES	301100	RESIDENTIAL SALES	OR	644,819	-	644,819	-	-	-	-	
4401000	RESIDENTIAL SALES	301100	RESIDENTIAL SALES	UT	840,427	-	-	-	-	840,427	-	
4401000	RESIDENTIAL SALES	301100	RESIDENTIAL SALES	WA	150,855	-	-	150,855	-	-	-	
4401000	RESIDENTIAL SALES	301100	RESIDENTIAL SALES	WYP	98,999	-	-	-	98,999	-	-	
4401000	RESIDENTIAL SALES	301100	RESIDENTIAL SALES	WYU	12,567	-	-	-	-	12,567	-	
4401000	RESIDENTIAL SALES	301106	Residential-Alt Revenue Program Adjs	WA	8,093	-	-	8,093	-	-	-	
4401000	RESIDENTIAL SALES	301107	Residential Revenue Acctg Adjustments	CA	(611)	(611)	-	-	-	-	-	
4401000	RESIDENTIAL SALES	301107	Residential Revenue Acctg Adjustments	IDU	(378)	-	-	-	-	(378)	-	
4401000	RESIDENTIAL SALES	301107	Residential Revenue Acctg Adjustments	OR	(2,553)	-	(2,553)	-	-	-	-	
4401000	RESIDENTIAL SALES	301107	Residential Revenue Acctg Adjustments	UT	58,492	-	-	-	-	58,492	-	
4401000	RESIDENTIAL SALES	301107	Residential Revenue Acctg Adjustments	WA	(2,550)	-	-	(2,550)	-	-	-	
4401000	RESIDENTIAL SALES	301107	Residential Revenue Acctg Adjustments	WYP	(337)	-	-	-	(337)	-	-	
4401000	RESIDENTIAL SALES	301108	Residential Revenue Adj - Deferred NPC M	UT	6,589	-	-	-	-	6,589	-	
4401000	RESIDENTIAL SALES	301108	Residential Revenue Adj - Deferred NPC M	WA	56	-	-	56	-	-	-	
4401000	RESIDENTIAL SALES	301108	Residential Revenue Adj - Deferred NPC M	WYP	(102)	-	-	-	(102)	-	-	
4401000	RESIDENTIAL SALES	301109	UNBILLED REVENUE - RESIDENTIAL	CA	(54)	(54)	-	-	-	-	-	
4401000	RESIDENTIAL SALES	301109	UNBILLED REVENUE - RESIDENTIAL	IDU	852	-	-	-	-	852	-	
4401000	RESIDENTIAL SALES	301109	UNBILLED REVENUE - RESIDENTIAL	OR	(1,454)	-	(1,454)	-	-	-	-	
4401000	RESIDENTIAL SALES	301109	UNBILLED REVENUE - RESIDENTIAL	UT	17,585	-	-	-	-	17,585	-	
4401000	RESIDENTIAL SALES	301109	UNBILLED REVENUE - RESIDENTIAL	WA	(1,665)	-	-	(1,665)	-	-	-	
4401000	RESIDENTIAL SALES	301109	UNBILLED REVENUE - RESIDENTIAL	WYP	(1,275)	-	-	-	(1,275)	-	-	
4401000	RESIDENTIAL SALES	301109	UNBILLED REVENUE - RESIDENTIAL	WYU	911	-	-	-	911	-	-	
4401000	RESIDENTIAL SALES	301110	Residential - Income Tax Deferral Adjs	CA	1,239	1,239	-	-	-	-	-	
4401000	RESIDENTIAL SALES	301110	Residential - Income Tax Deferral Adjs	IDU	109	-	-	-	-	109	-	
4401000	RESIDENTIAL SALES	301110	Residential - Income Tax Deferral Adjs	OR	18,778	-	18,778	-	-	-	-	
4401000	RESIDENTIAL SALES	301110	Residential - Income Tax Deferral Adjs	UT	1,133	-	-	-	-	1,133	-	
4401000	RESIDENTIAL SALES	301110	Residential - Income Tax Deferral Adjs	WA	445	-	-	445	-	-	-	
4401000	RESIDENTIAL SALES	301110	Residential - Income Tax Deferral Adjs	WYP	34	-	-	-	34	-	-	
4401000	RESIDENTIAL SALES	301111	Residential-OR Corp Act Tax Rev Adj	OTHER	2,761	-	-	-	-	-	2,761	
4401000	RESIDENTIAL SALES	301112	Residential - Customer Bill Credits	OR	(716)	-	(716)	-	-	-	-	
4401000	RESIDENTIAL SALES	301112	Residential - Customer Bill Credits	UT	(1,449)	-	-	-	-	(1,449)	-	
4401000	RESIDENTIAL SALES	301112	Residential - Customer Bill Credits	WA	(70)	-	-	(70)	-	-	-	
4401000	RESIDENTIAL SALES	301119	UNBILLED REVENUE - UNCOLLECTIBLE	CA	1	1	-	-	-	-	-	
4401000	RESIDENTIAL SALES	301119	UNBILLED REVENUE - UNCOLLECTIBLE	IDU	(11)	-	-	-	-	(11)	-	
4401000	RESIDENTIAL SALES	301119	UNBILLED REVENUE - UNCOLLECTIBLE	OR	(31)	-	(31)	-	-	-	-	
4401000	RESIDENTIAL SALES	301119	UNBILLED REVENUE - UNCOLLECTIBLE	UT	(111)	-	-	-	-	(111)	-	
4401000	RESIDENTIAL SALES	301119	UNBILLED REVENUE - UNCOLLECTIBLE	WA	(1)	-	-	(1)	-	-	-	
4401000	RESIDENTIAL SALES	301119	UNBILLED REVENUE - UNCOLLECTIBLE	WYP	(13)	-	-	-	(13)	-	-	
4401000	RESIDENTIAL SALES	301165	Solar Feed-In Revenue - Residential	OTHER	3,744	-	-	-	-	-	3,744	
4401000	RESIDENTIAL SALES	301168	Community Solar Revenue-Residential	OTHER	234	-	-	-	-	-	234	
4401000	RESIDENTIAL SALES	301170	DSM Revenue - Residential	OTHER	37,173	-	-	-	-	-	37,173	
4401000	RESIDENTIAL SALES	301171	DSM Revenue - Residential Cat 2 Gen Svc	OTHER	23	-	-	-	-	-	23	
4401000	RESIDENTIAL SALES	301180	Blue Sky Revenue Residential	OTHER	7,078	-	-	-	-	-	7,078	
4401000	RESIDENTIAL SALES	301190	Other Cust Retail Revenue-Residential	OTHER	62	-	-	-	-	-	62	
<b>4401000 Total</b>					<b>2,032,842</b>	<b>49,794</b>	<b>658,843</b>	<b>155,162</b>	<b>110,785</b>	<b>922,667</b>	<b>84,518</b>	<b>51,074</b>
4421000	COMMERCIAL SALES	301200	COMMERCIAL SALES	CA	31,198	31,198	-	-	-	-	-	
4421000	COMMERCIAL SALES	301200	COMMERCIAL SALES	IDU	46,072	-	-	-	-	46,072	-	
4421000	COMMERCIAL SALES	301200	COMMERCIAL SALES	OR	468,560	-	468,560	-	-	-	-	
4421000	COMMERCIAL SALES	301200	COMMERCIAL SALES	UT	731,595	-	-	-	-	731,595	-	
4421000	COMMERCIAL SALES	301200	COMMERCIAL SALES	WA	122,804	-	-	122,804	-	-	-	
4421000	COMMERCIAL SALES	301200	COMMERCIAL SALES	WYP	104,280	-	-	-	104,280	-	-	
4421000	COMMERCIAL SALES	301200	COMMERCIAL SALES	WYU	10,692	-	-	-	10,692	-	-	
4421000	COMMERCIAL SALES	301206	Commercial-Alt Revenue Program Adjs	WA	4,909	-	-	4,909	-	-	-	
4421000	COMMERCIAL SALES	301207	Commercial Revenue Acctg Adjustments	CA	(350)	(350)	-	-	-	-	-	
4421000	COMMERCIAL SALES	301207	Commercial Revenue Acctg Adjustments	IDU	(235)	-	-	-	-	(235)	-	
4421000	COMMERCIAL SALES	301207	Commercial Revenue Acctg Adjustments	OR	1,031	-	1,031	-	-	-	-	
4421000	COMMERCIAL SALES	301207	Commercial Revenue Acctg Adjustments	UT	63,733	-	-	-	-	63,733	-	
4421000	COMMERCIAL SALES	301207	Commercial Revenue Acctg Adjustments	WA	(3,432)	-	-	(3,432)	-	-	-	
4421000	COMMERCIAL SALES	301207	Commercial Revenue Acctg Adjustments	WYP	(549)	-	-	-	(549)	-	-	
4421000	COMMERCIAL SALES	301208	Commercial Revenue Adj - Deferred NPC Me	UT	8,013	-	-	-	-	8,013	-	
4421000	COMMERCIAL SALES	301208	Commercial Revenue Adj - Deferred NPC Me	WA	53	-	-	53	-	-	-	
4421000	COMMERCIAL SALES	301208	Commercial Revenue Adj - Deferred NPC Me	WYP	(136)	-	-	-	(136)	-	-	
4421000	COMMERCIAL SALES	301209	UNBILLED REVENUE - COMMERCIAL	CA	(508)	(508)	-	-	-	-	-	
4421000	COMMERCIAL SALES	301209	UNBILLED REVENUE - COMMERCIAL	IDU	(61)	-	-	-	-	(61)	-	
4421000	COMMERCIAL SALES	301209	UNBILLED REVENUE - COMMERCIAL	OR	9,873	-	9,873	-	-	-	-	
4421000	COMMERCIAL SALES	301209	UNBILLED REVENUE - COMMERCIAL	UT	9,650	-	-	-	-	9,650	-	
4421000	COMMERCIAL SALES	301209	UNBILLED REVENUE - COMMERCIAL	WA	1,276	-	-	1,276	-	-	-	
4421000	COMMERCIAL SALES	301209	UNBILLED REVENUE - COMMERCIAL	WYP	(1,047)	-	-	-	(1,047)	-	-	
4421000	COMMERCIAL SALES	301209	UNBILLED REVENUE - COMMERCIAL	WYU	61	-	-	-	61	-	-	
4421000	COMMERCIAL SALES	301210	Commercial - Income Tax Deferral Adjs	CA	788	788	-	-	-	-	-	
4421000	COMMERCIAL SALES	301210	Commercial - Income Tax Deferral Adjs	IDU	75	-	-	-	-	75	-	
4421000	COMMERCIAL SALES	301210	Commercial - Income Tax Deferral Adjs	OR	17,786	-	17,786	-	-	-	-	



Electric Operations Revenue (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other	
4421000	COMMERCIAL SALES	301210	Commercial - Income Tax Deferral Adjs	UT	1,446	-	-	-	1,446	-	-	
4421000	COMMERCIAL SALES	301210	Commercial - Income Tax Deferral Adjs	WA	412	-	412	-	-	-	-	
4421000	COMMERCIAL SALES	301210	Commercial - Income Tax Deferral Adjs	WYP	46	-	-	46	-	-	-	
4421000	COMMERCIAL SALES	301211	Commercial-OR Corp Act Tax Alt Rev Adj	OTHER	1,986	-	-	-	-	-	1,986	
4421000	COMMERCIAL SALES	301212	Commercial - Customer Bill Credits	OR	(80)	(80)	-	-	-	-	-	
4421000	COMMERCIAL SALES	301212	Commercial - Customer Bill Credits	UT	(100)	-	-	-	(100)	-	-	
4421000	COMMERCIAL SALES	301212	Commercial - Customer Bill Credits	WA	(14)	-	(14)	-	-	-	-	
4421000	COMMERCIAL SALES	301265	Solar Feed-In Revenue - Commercial	OTHER	3,876	-	-	-	-	-	3,876	
4421000	COMMERCIAL SALES	301268	Community Solar Revenue-Commercial	OTHER	170	-	-	-	-	-	170	
4421000	COMMERCIAL SALES	301270	DSM Revenue - Commercial	OTHER	25,628	-	-	-	-	-	25,628	
4421000	COMMERCIAL SALES	301271	DSM Revenue - Small Commercial	OTHER	1,401	-	-	-	-	-	1,401	
4421000	COMMERCIAL SALES	301272	DSM Revenue - Large Commercial	OTHER	75	-	-	-	-	-	75	
4421000	COMMERCIAL SALES	301280	Blue Sky Revenue - Commercial	OTHER	2,343	-	-	-	-	-	2,343	
4421000	COMMERCIAL SALES	301290	Other Cust Retail Revenue-Commercial	OTHER	81	-	-	-	-	-	81	
<b>4421000 Total</b>					<b>1,663,402</b>	<b>31,128</b>	<b>497,170</b>	<b>126,008</b>	<b>113,348</b>	<b>814,337</b>	<b>45,851</b>	<b>35,560</b>
4422000	IND SLS/EXCL IRRIG	301300	INDUSTRIAL SALES (EXCLUDING IRRIGATION)	CA	5,530	5,530	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301300	INDUSTRIAL SALES (EXCLUDING IRRIGATION)	IDU	12,866	-	-	-	-	12,866	-	
4422000	IND SLS/EXCL IRRIG	301300	INDUSTRIAL SALES (EXCLUDING IRRIGATION)	OR	109,707	109,707	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301300	INDUSTRIAL SALES (EXCLUDING IRRIGATION)	UT	326,520	-	-	-	326,520	-	-	
4422000	IND SLS/EXCL IRRIG	301300	INDUSTRIAL SALES (EXCLUDING IRRIGATION)	WA	54,593	-	54,593	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301300	INDUSTRIAL SALES (EXCLUDING IRRIGATION)	WYP	303,636	-	-	303,636	-	-	-	
4422000	IND SLS/EXCL IRRIG	301300	INDUSTRIAL SALES (EXCLUDING IRRIGATION)	WYU	65,983	-	-	65,983	-	-	-	
4422000	IND SLS/EXCL IRRIG	301304	SPECIAL CONTRACTS-SITUS	IDU	98,623	-	-	-	-	98,623	-	
4422000	IND SLS/EXCL IRRIG	301304	SPECIAL CONTRACTS-SITUS	UT	122,915	-	-	-	122,915	-	-	
4422000	IND SLS/EXCL IRRIG	301306	Industrial-Alt Revenue Program Adjs	WA	(1,642)	-	(1,642)	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301307	Industrial Revenue Actgt Adjustments	CA	(57)	(57)	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301307	Industrial Revenue Actgt Adjustments	IDU	(418)	-	-	-	(418)	-	-	
4422000	IND SLS/EXCL IRRIG	301307	Industrial Revenue Actgt Adjustments	OR	(485)	(485)	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301307	Industrial Revenue Actgt Adjustments	UT	64,345	-	-	-	64,345	-	-	
4422000	IND SLS/EXCL IRRIG	301307	Industrial Revenue Actgt Adjustments	WA	936	-	936	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301307	Industrial Revenue Actgt Adjustments	WYP	(3,175)	-	-	(3,175)	-	-	-	
4422000	IND SLS/EXCL IRRIG	301308	Industrial Revenue Adj - Deferred NPC Me	UT	7,216	-	-	-	7,216	-	-	
4422000	IND SLS/EXCL IRRIG	301308	Industrial Revenue Adj - Deferred NPC Me	WA	27	-	27	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301308	Industrial Revenue Adj - Deferred NPC Me	WYP	(652)	-	-	(652)	-	-	-	
4422000	IND SLS/EXCL IRRIG	301309	UNBILLED REVENUE - INDUSTRIAL	CA	(8)	(8)	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301309	UNBILLED REVENUE - INDUSTRIAL	IDU	(3,426)	-	-	-	(3,426)	-	-	
4422000	IND SLS/EXCL IRRIG	301309	UNBILLED REVENUE - INDUSTRIAL	OR	1,390	1,390	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301309	UNBILLED REVENUE - INDUSTRIAL	UT	11,670	-	-	-	11,670	-	-	
4422000	IND SLS/EXCL IRRIG	301309	UNBILLED REVENUE - INDUSTRIAL	WA	17	-	17	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301309	UNBILLED REVENUE - INDUSTRIAL	WYP	3,767	-	-	3,767	-	-	-	
4422000	IND SLS/EXCL IRRIG	301309	UNBILLED REVENUE - INDUSTRIAL	WYU	1,925	-	-	1,925	-	-	-	
4422000	IND SLS/EXCL IRRIG	301310	Industrial - Income Tax Deferral Adjs	CA	189	189	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301310	Industrial - Income Tax Deferral Adjs	IDU	245	-	-	-	245	-	-	
4422000	IND SLS/EXCL IRRIG	301310	Industrial - Income Tax Deferral Adjs	OR	5,575	5,575	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301310	Industrial - Income Tax Deferral Adjs	UT	1,279	-	-	-	1,279	-	-	
4422000	IND SLS/EXCL IRRIG	301310	Industrial - Income Tax Deferral Adjs	WA	134	-	134	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301310	Industrial - Income Tax Deferral Adjs	WYP	233	-	-	233	-	-	-	
4422000	IND SLS/EXCL IRRIG	301311	Industrial-OR Corp Act Tax Rev Adj	OTHER	466	-	-	-	-	-	466	
4422000	IND SLS/EXCL IRRIG	301312	Industrial - Customer Bill Credits	OR	(5)	(5)	-	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301312	Industrial - Customer Bill Credits	UT	(32)	-	-	-	(32)	-	-	
4422000	IND SLS/EXCL IRRIG	301312	Industrial - Customer Bill Credits	WA	(4)	-	(4)	-	-	-	-	
4422000	IND SLS/EXCL IRRIG	301365	Solar Feed-In Revenue - Industrial	OTHER	2,241	-	-	-	-	-	2,241	
4422000	IND SLS/EXCL IRRIG	301368	Community Solar Revenue-Industrial	OTHER	47	-	-	-	-	-	47	
4422000	IND SLS/EXCL IRRIG	301370	DSM Revenue - Industrial	OTHER	10,533	-	-	-	-	-	10,533	
4422000	IND SLS/EXCL IRRIG	301371	DSM Revenue - Small Industrial	OTHER	323	-	-	-	-	-	323	
4422000	IND SLS/EXCL IRRIG	301372	DSM Revenue - Large Industrial	OTHER	1,994	-	-	-	-	-	1,994	
4422000	IND SLS/EXCL IRRIG	301380	Blue Sky Revenue - Industrial	OTHER	842	-	-	-	-	-	842	
4422000	IND SLS/EXCL IRRIG	301390	Other Cust Retail Revenue-Industrial	OTHER	26	-	-	-	-	-	26	
<b>4422000 Total</b>					<b>1,205,885</b>	<b>5,654</b>	<b>116,182</b>	<b>54,060</b>	<b>371,716</b>	<b>533,913</b>	<b>107,889</b>	<b>16,471</b>
4423000	INDUST SALES-IRRIG	301450	INDUSTRIAL SALES - IRRIGATION	CA	14,463	14,463	-	-	-	-	-	
4423000	INDUST SALES-IRRIG	301450	INDUSTRIAL SALES - IRRIGATION	IDU	62,030	-	-	-	62,030	-	-	
4423000	INDUST SALES-IRRIG	301450	INDUSTRIAL SALES - IRRIGATION	OR	28,017	28,017	-	-	-	-	-	
4423000	INDUST SALES-IRRIG	301450	INDUSTRIAL SALES - IRRIGATION	UT	21,631	-	-	-	21,631	-	-	
4423000	INDUST SALES-IRRIG	301450	INDUSTRIAL SALES - IRRIGATION	WA	15,395	-	15,395	-	-	-	-	
4423000	INDUST SALES-IRRIG	301450	INDUSTRIAL SALES - IRRIGATION	WYP	2,105	-	-	2,105	-	-	-	
4423000	INDUST SALES-IRRIG	301450	INDUSTRIAL SALES - IRRIGATION	WYU	642	-	-	642	-	-	-	
4423000	INDUST SALES-IRRIG	301453	Irrigation - Customer Bill Credits	OR	(3)	(3)	-	-	-	-	-	
4423000	INDUST SALES-IRRIG	301453	Irrigation - Customer Bill Credits	UT	(1)	-	-	-	(1)	-	-	
4423000	INDUST SALES-IRRIG	301453	Irrigation - Customer Bill Credits	WA	(3)	-	(3)	-	-	-	-	
4423000	INDUST SALES-IRRIG	301454	Irrigation-OR Corp Act Tax Rev Adj	OTHER	121	-	-	-	-	-	121	
4423000	INDUST SALES-IRRIG	301455	Irrigation - Income Tax Deferral Adjs	CA	312	312	-	-	-	-	-	
4423000	INDUST SALES-IRRIG	301455	Irrigation - Income Tax Deferral Adjs	IDU	94	-	-	-	94	-	-	
4423000	INDUST SALES-IRRIG	301455	Irrigation - Income Tax Deferral Adjs	OR	1,001	1,001	-	-	-	-	-	
4423000	INDUST SALES-IRRIG	301455	Irrigation - Income Tax Deferral Adjs	UT	33	-	-	-	33	-	-	



Electric Operations Revenue (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other	
4423000	INDUST SALES-IRRIG	301455	Irrigation - Income Tax Deferral Adjs	WA	24	-	-	24	-	-	-	
4423000	INDUST SALES-IRRIG	301455	Irrigation - Income Tax Deferral Adjs	WYP	1	-	-	1	-	-	-	
4423000	INDUST SALES-IRRIG	301456	Irrigation-Alt Revenue Program Adjs	WA	(1,411)	-	-	(1,411)	-	-	-	
4423000	INDUST SALES-IRRIG	301457	Irrigation Revenue Acctg Adjustments	CA	(159)	(159)	-	-	-	-	-	
4423000	INDUST SALES-IRRIG	301457	Irrigation Revenue Acctg Adjustments	IDU	(297)	-	-	-	(297)	-	-	
4423000	INDUST SALES-IRRIG	301457	Irrigation Revenue Acctg Adjustments	OR	(75)	-	(75)	-	-	-	-	
4423000	INDUST SALES-IRRIG	301457	Irrigation Revenue Acctg Adjustments	UT	4,613	-	-	-	4,613	-	-	
4423000	INDUST SALES-IRRIG	301457	Irrigation Revenue Acctg Adjustments	WA	90	-	-	90	-	-	-	
4423000	INDUST SALES-IRRIG	301457	Irrigation Revenue Acctg Adjustments	WYP	(8)	-	-	-	(8)	-	-	
4423000	INDUST SALES-IRRIG	301458	Irrigation Revenue Adj - Deferred NPC Me	UT	244	-	-	-	244	-	-	
4423000	INDUST SALES-IRRIG	301458	Irrigation Revenue Adj - Deferred NPC Me	WA	6	-	-	6	-	-	-	
4423000	INDUST SALES-IRRIG	301458	Irrigation Revenue Adj - Deferred NPC Me	WYP	(3)	-	-	-	(3)	-	-	
4423000	INDUST SALES-IRRIG	301459	UNBILLED REVENUE - IRRIGATION/FARM	CA	447	447	-	-	-	-	-	
4423000	INDUST SALES-IRRIG	301459	UNBILLED REVENUE - IRRIGATION/FARM	IDU	6,653	-	-	-	6,653	-	-	
4423000	INDUST SALES-IRRIG	301459	UNBILLED REVENUE - IRRIGATION/FARM	OR	1,205	-	1,205	-	-	-	-	
4423000	INDUST SALES-IRRIG	301459	UNBILLED REVENUE - IRRIGATION/FARM	UT	702	-	-	-	702	-	-	
4423000	INDUST SALES-IRRIG	301459	UNBILLED REVENUE - IRRIGATION/FARM	WA	776	-	-	776	-	-	-	
4423000	INDUST SALES-IRRIG	301459	UNBILLED REVENUE - IRRIGATION/FARM	WYP	168	-	-	-	168	-	-	
4423000	INDUST SALES-IRRIG	301459	UNBILLED REVENUE - IRRIGATION/FARM	WYU	24	-	-	-	24	-	-	
4423000	INDUST SALES-IRRIG	301461	Unbilled Revenue-Irrigation Demand Charg	CA	24	24	-	-	-	-	-	
4423000	INDUST SALES-IRRIG	301461	Unbilled Revenue-Irrigation Demand Charg	OR	193	-	193	-	-	-	-	
4423000	INDUST SALES-IRRIG	301461	Unbilled Revenue-Irrigation Demand Charg	WA	(66)	-	-	(66)	-	-	-	
4423000	INDUST SALES-IRRIG	301465	Solar Feed-In Revenue - Irrigation	OTHER	119	-	-	-	-	-	119	
4423000	INDUST SALES-IRRIG	301468	Community Solar Revenue-Irrigation	OTHER	8	-	-	-	-	-	8	
4423000	INDUST SALES-IRRIG	301470	DSM Revenue - Irrigation	OTHER	3,315	-	-	-	-	-	3,315	
4423000	INDUST SALES-IRRIG	301480	Blue Sky Revenue - Irrigation	OTHER	4	-	-	-	-	-	4	
4423000	INDUST SALES-IRRIG	301490	Other Cust Retail Revenue-Irrigation	OTHER	7	-	-	-	-	-	7	
<b>4423000 Total</b>					<b>162,438</b>	<b>15,087</b>	<b>30,338</b>	<b>14,811</b>	<b>2,929</b>	<b>27,221</b>	<b>68,479</b>	<b>3,573</b>
4441000	PUB ST/HWY LIGHT	301600	PUBLIC STREET AND HIGHWAY LIGHTING	CA	356	356	-	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301600	PUBLIC STREET AND HIGHWAY LIGHTING	IDU	538	-	-	-	538	-	-	
4441000	PUB ST/HWY LIGHT	301600	PUBLIC STREET AND HIGHWAY LIGHTING	OR	5,730	-	5,730	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301600	PUBLIC STREET AND HIGHWAY LIGHTING	UT	7,041	-	-	-	7,041	-	-	
4441000	PUB ST/HWY LIGHT	301600	PUBLIC STREET AND HIGHWAY LIGHTING	WA	724	-	-	724	-	-	-	
4441000	PUB ST/HWY LIGHT	301600	PUBLIC STREET AND HIGHWAY LIGHTING	WYP	1,533	-	-	-	1,533	-	-	
4441000	PUB ST/HWY LIGHT	301600	PUBLIC STREET AND HIGHWAY LIGHTING	WYU	334	-	-	-	334	-	-	
4441000	PUB ST/HWY LIGHT	301607	Public St/Hwy Lights Rev Acctg Adjustmen	CA	(4)	(4)	-	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301607	Public St/Hwy Lights Rev Acctg Adjustmen	IDU	(3)	-	-	-	-	(3)	-	
4441000	PUB ST/HWY LIGHT	301607	Public St/Hwy Lights Rev Acctg Adjustmen	OR	(12)	-	(12)	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301607	Public St/Hwy Lights Rev Acctg Adjustmen	UT	487	-	-	-	487	-	-	
4441000	PUB ST/HWY LIGHT	301607	Public St/Hwy Lights Rev Acctg Adjustmen	WA	(18)	-	-	(18)	-	-	-	
4441000	PUB ST/HWY LIGHT	301607	Public St/Hwy Lights Rev Acctg Adjustmen	WYU	(4)	-	-	-	(4)	-	-	
4441000	PUB ST/HWY LIGHT	301608	Public St/Hwy Lgt Rev Adj-Def NPC Mech	UT	59	-	-	-	59	-	-	
4441000	PUB ST/HWY LIGHT	301608	Public St/Hwy Lgt Rev Adj-Def NPC Mech	WYP	(1)	-	-	-	(1)	-	-	
4441000	PUB ST/HWY LIGHT	301609	UNBILLED REV - PUBLIC ST/HWY LIGHTING	CA	(2)	(2)	-	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301609	UNBILLED REV - PUBLIC ST/HWY LIGHTING	IDU	(6)	-	-	-	(6)	-	-	
4441000	PUB ST/HWY LIGHT	301609	UNBILLED REV - PUBLIC ST/HWY LIGHTING	OR	(41)	-	(41)	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301609	UNBILLED REV - PUBLIC ST/HWY LIGHTING	UT	(98)	-	-	-	(98)	-	-	
4441000	PUB ST/HWY LIGHT	301609	UNBILLED REV - PUBLIC ST/HWY LIGHTING	WA	15	-	-	15	-	-	-	
4441000	PUB ST/HWY LIGHT	301609	UNBILLED REV - PUBLIC ST/HWY LIGHTING	WYP	(3)	-	-	-	(3)	-	-	
4441000	PUB ST/HWY LIGHT	301609	UNBILLED REV - PUBLIC ST/HWY LIGHTING	WYU	20	-	-	-	20	-	-	
4441000	PUB ST/HWY LIGHT	301610	St&Hwy Light - Income Tax Deferral Adjs	CA	6	6	-	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301610	St&Hwy Light - Income Tax Deferral Adjs	IDU	0	-	-	-	0	-	-	
4441000	PUB ST/HWY LIGHT	301610	St&Hwy Light - Income Tax Deferral Adjs	OR	130	-	130	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301610	St&Hwy Light - Income Tax Deferral Adjs	UT	10	-	-	-	10	-	-	
4441000	PUB ST/HWY LIGHT	301610	St&Hwy Light - Income Tax Deferral Adjs	WA	3	-	-	3	-	-	-	
4441000	PUB ST/HWY LIGHT	301610	St&Hwy Light - Income Tax Deferral Adjs	WYP	0	-	-	-	0	-	-	
4441000	PUB ST/HWY LIGHT	301611	St&Hwy Light-OR Corp Act Tax Rev Adj	OTHER	25	-	-	-	-	-	25	
4441000	PUB ST/HWY LIGHT	301612	St&Hwy Light - Customer Bill Credits	OR	(1)	-	(1)	-	-	-	-	
4441000	PUB ST/HWY LIGHT	301612	St&Hwy Light - Customer Bill Credits	UT	(0)	-	-	-	(0)	-	-	
4441000	PUB ST/HWY LIGHT	301612	St&Hwy Light - Customer Bill Credits	WA	(27)	-	-	(27)	-	-	-	
4441000	PUB ST/HWY LIGHT	301665	Solar Feed-In Revenue - St/Hwy Lighting	OTHER	26	-	-	-	-	-	26	
4441000	PUB ST/HWY LIGHT	301668	Community Solar Revenue-St/Hwy Lightg	OTHER	1	-	-	-	-	-	1	
4441000	PUB ST/HWY LIGHT	301670	DSM Revenue - Street/Hwy Lighting	OTHER	247	-	-	-	-	-	247	
4441000	PUB ST/HWY LIGHT	301690	Other Cust Retail Revenue-St/Hwy Lightg	OTHER	0	-	-	-	-	-	0	
<b>4441000 Total</b>					<b>17,065</b>	<b>356</b>	<b>5,807</b>	<b>697</b>	<b>1,880</b>	<b>7,498</b>	<b>530</b>	<b>299</b>
4471000	ON-SYS WHOLE-FIRM	301443	ON SYS FIRM-UTAH FERC CUSTOMERS	FERC	12,376	-	-	-	-	-	12,376	
4471000	ON-SYS WHOLE-FIRM	301445	On Sys Firm-Utah W/S Customers-Deferral	UT	(60)	-	-	-	(60)	-	-	
<b>4471000 Total</b>					<b>12,316</b>	-	-	-	<b>(60)</b>	-	<b>12,376</b>	
4471300	POST MERGER FIRM	301405	POST MERGER FIRM	SG	7,377	108	1,918	577	1,044	3,286	442	2
<b>4471300 Total</b>					<b>7,377</b>	<b>108</b>	<b>1,918</b>	<b>577</b>	<b>1,044</b>	<b>3,286</b>	<b>442</b>	<b>2</b>
4471400	S/T FIRM WHOLESale	301406	SHORT-TERM FIRM WHOLESale SALES	SG	277,598	4,062	72,180	21,704	39,291	123,652	16,626	81
4471400	S/T FIRM WHOLESale	301409	TRADING SALES NETTED-EST.	SG	64	1	17	5	9	29	4	0
4471400	S/T FIRM WHOLESale	301410	TRADING SALES NETTED	SG	(803)	(12)	(209)	(63)	(114)	(358)	(48)	(0)



Electric Operations Revenue (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
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Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other		
4471400	S/T FIRM WHOLESAL	301411	BOOKOUT SALES NETTED	SG	(105,787)	(1,548)	(27,506)	(8,271)	(14,973)	(47,121)	(6,336)	(31)	-
4471400	S/T FIRM WHOLESAL	301412	BOOKOUT SALES NETTED-ESTIMATE	SG	1,731	25	450	135	245	771	104	1	-
4471400	S/T FIRM WHOLESAL	302751	I/C S-T Firm Wholesale Sales-Sierra Pac	SG	28	0	7	2	4	12	2	0	-
4471400	S/T FIRM WHOLESAL	302752	I/C S-T Firm Wholesale Sales-Nevada Pwr	SG	921	13	240	72	130	410	55	0	-
4471400	S/T FIRM WHOLESAL	303028	LINE LOSS W/S TRADING REVENUES	SG	7,473	109	1,943	584	1,058	3,329	448	2	-
<b>4471400 Total</b>					<b>181,226</b>	<b>2,652</b>	<b>47,122</b>	<b>14,169</b>	<b>25,651</b>	<b>80,725</b>	<b>10,854</b>	<b>53</b>	<b>-</b>
4472000	SLS FOR RESL-SURP	301419	ESTIMATED SALES FOR RESALE REVENUE	SG	(341)	(5)	(89)	(27)	(48)	(152)	(20)	(0)	-
4472000	SLS FOR RESL-SURP	302762	I/C Wholesale Sales Estimate-Nevada Pwr	SG	17	0	4	1	2	7	1	0	-
4472000	SLS FOR RESL-SURP	303198	Non-ASC 606-WS NPC Rev-Derivatv (Disc)	SG	52,642	770	13,688	4,116	7,451	23,449	3,153	15	-
4472000	SLS FOR RESL-SURP	303199	Non-ASC 606-WS NPC Rev-Derivatv (Recl)	SG	(52,642)	(770)	(13,688)	(4,116)	(7,451)	(23,449)	(3,153)	(15)	-
<b>4472000 Total</b>					<b>(324)</b>	<b>(5)</b>	<b>(84)</b>	<b>(25)</b>	<b>(46)</b>	<b>(144)</b>	<b>(19)</b>	<b>(0)</b>	<b>-</b>
4475000	OFF-SYS - NON FIRM	301408	OFF-SYSTEM WHOLESAL - NON FIRM	SE	(3,707)	(52)	(924)	(272)	(569)	(1,653)	(237)	(1)	-
<b>4475000 Total</b>					<b>(3,707)</b>	<b>(52)</b>	<b>(924)</b>	<b>(272)</b>	<b>(569)</b>	<b>(1,653)</b>	<b>(237)</b>	<b>(1)</b>	<b>-</b>
4476100	BOOKOUTS NETTED-GAIN	304101	BOOKOUTS NETTED-GAIN	SG	15,242	223	3,963	1,192	2,157	6,789	913	4	-
<b>4476100 Total</b>					<b>15,242</b>	<b>223</b>	<b>3,963</b>	<b>1,192</b>	<b>2,157</b>	<b>6,789</b>	<b>913</b>	<b>4</b>	<b>-</b>
4476200	TRADING NETTED-GAINS	304201	TRADING NETTED-GAINS	SG	62	1	16	5	9	28	4	0	-
<b>4476200 Total</b>					<b>62</b>	<b>1</b>	<b>16</b>	<b>5</b>	<b>9</b>	<b>28</b>	<b>4</b>	<b>0</b>	<b>-</b>
4479000	TRANS SRVC	301428	TRANS SERV-UTAH FERC CUSTOMERS	FERC	125	-	-	-	-	-	-	125	-
<b>4479000 Total</b>					<b>125</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>125</b>	<b>-</b>
4491800	PRV RTE RFDS-RESLE	301975	Wholesales Sales - Subject to Refund	SG	(3,240)	(47)	(842)	(253)	(459)	(1,443)	(194)	(1)	-
<b>4491800 Total</b>					<b>(3,240)</b>	<b>(47)</b>	<b>(842)</b>	<b>(253)</b>	<b>(459)</b>	<b>(1,443)</b>	<b>(194)</b>	<b>(1)</b>	<b>-</b>
4501000	FORF DISC/INT-RES	301820	FORFEITED DISCOUNT REVENUE-RESIDENTIAL	CA	(0)	(0)	-	-	-	-	-	-	-
4501000	FORF DISC/INT-RES	301820	FORFEITED DISCOUNT REVENUE-RESIDENTIAL	IDU	286	-	-	-	-	-	-	286	-
4501000	FORF DISC/INT-RES	301820	FORFEITED DISCOUNT REVENUE-RESIDENTIAL	OR	(8)	-	(8)	-	-	-	-	-	-
4501000	FORF DISC/INT-RES	301820	FORFEITED DISCOUNT REVENUE-RESIDENTIAL	UT	3,696	-	-	-	-	3,696	-	-	-
4501000	FORF DISC/INT-RES	301820	FORFEITED DISCOUNT REVENUE-RESIDENTIAL	WA	(2)	-	-	(2)	-	-	-	-	-
4501000	FORF DISC/INT-RES	301820	FORFEITED DISCOUNT REVENUE-RESIDENTIAL	WYP	633	-	-	-	633	-	-	-	-
4501000	FORF DISC/INT-RES	301820	FORFEITED DISCOUNT REVENUE-RESIDENTIAL	WYU	69	-	-	-	-	69	-	-	-
<b>4501000 Total</b>					<b>4,672</b>	<b>(0)</b>	<b>(8)</b>	<b>(2)</b>	<b>702</b>	<b>3,696</b>	<b>286</b>	<b>-</b>	<b>-</b>
4502000	FORF DISC/INT-COMM	301821	FORFEITED DISCOUNT REVENUE-COMMERCIAL	CA	(0)	(0)	-	-	-	-	-	-	-
4502000	FORF DISC/INT-COMM	301821	FORFEITED DISCOUNT REVENUE-COMMERCIAL	IDU	32	-	-	-	-	-	-	32	-
4502000	FORF DISC/INT-COMM	301821	FORFEITED DISCOUNT REVENUE-COMMERCIAL	OR	(2)	-	(2)	-	-	-	-	-	-
4502000	FORF DISC/INT-COMM	301821	FORFEITED DISCOUNT REVENUE-COMMERCIAL	UT	940	-	-	-	-	940	-	-	-
4502000	FORF DISC/INT-COMM	301821	FORFEITED DISCOUNT REVENUE-COMMERCIAL	WA	(0)	-	-	(0)	-	-	-	-	-
4502000	FORF DISC/INT-COMM	301821	FORFEITED DISCOUNT REVENUE-COMMERCIAL	WYP	124	-	-	-	124	-	-	-	-
4502000	FORF DISC/INT-COMM	301821	FORFEITED DISCOUNT REVENUE-COMMERCIAL	WYU	17	-	-	-	-	17	-	-	-
<b>4502000 Total</b>					<b>1,111</b>	<b>(0)</b>	<b>(2)</b>	<b>(0)</b>	<b>141</b>	<b>940</b>	<b>32</b>	<b>-</b>	<b>-</b>
4503000	FORF DISC/INT-IND	301822	FORFEITED DISCOUNT REVENUE-INDUSTRIAL	IDU	136	-	-	-	-	-	-	136	-
4503000	FORF DISC/INT-IND	301822	FORFEITED DISCOUNT REVENUE-INDUSTRIAL	OR	(0)	-	(0)	-	-	-	-	-	-
4503000	FORF DISC/INT-IND	301822	FORFEITED DISCOUNT REVENUE-INDUSTRIAL	UT	323	-	-	-	-	-	323	-	-
4503000	FORF DISC/INT-IND	301822	FORFEITED DISCOUNT REVENUE-INDUSTRIAL	WA	(0)	-	-	(0)	-	-	-	-	-
4503000	FORF DISC/INT-IND	301822	FORFEITED DISCOUNT REVENUE-INDUSTRIAL	WYP	71	-	-	-	71	-	-	-	-
4503000	FORF DISC/INT-IND	301822	FORFEITED DISCOUNT REVENUE-INDUSTRIAL	WYU	171	-	-	-	-	171	-	-	-
<b>4503000 Total</b>					<b>701</b>	<b>-</b>	<b>(0)</b>	<b>(0)</b>	<b>242</b>	<b>323</b>	<b>136</b>	<b>-</b>	<b>-</b>
4504000	GOVT MUNI/ALL OTH	301823	FORFEITED DISCOUNT REVENUE-ALL OTHER	IDU	6	-	-	-	-	-	-	6	-
4504000	GOVT MUNI/ALL OTH	301823	FORFEITED DISCOUNT REVENUE-ALL OTHER	OR	(9)	-	(9)	-	-	-	-	-	-
4504000	GOVT MUNI/ALL OTH	301823	FORFEITED DISCOUNT REVENUE-ALL OTHER	UT	116	-	-	-	-	-	116	-	-
4504000	GOVT MUNI/ALL OTH	301823	FORFEITED DISCOUNT REVENUE-ALL OTHER	WYP	4	-	-	-	4	-	-	-	-
4504000	GOVT MUNI/ALL OTH	301823	FORFEITED DISCOUNT REVENUE-ALL OTHER	WYU	0	-	-	-	0	-	-	-	-
<b>4504000 Total</b>					<b>116</b>	<b>-</b>	<b>(9)</b>	<b>-</b>	<b>4</b>	<b>116</b>	<b>6</b>	<b>-</b>	<b>-</b>
4511000	ACCOUNT SERV CHG	301825	MISC SERV REV-ACCT SERVICE CHARGE	CA	423	423	-	-	-	-	-	-	-
4511000	ACCOUNT SERV CHG	301825	MISC SERV REV-ACCT SERVICE CHARGE	IDU	53	-	-	-	-	-	-	53	-
4511000	ACCOUNT SERV CHG	301825	MISC SERV REV-ACCT SERVICE CHARGE	OR	971	-	971	-	-	-	-	-	-
4511000	ACCOUNT SERV CHG	301825	MISC SERV REV-ACCT SERVICE CHARGE	UT	3,462	-	-	-	-	3,462	-	-	-
4511000	ACCOUNT SERV CHG	301825	MISC SERV REV-ACCT SERVICE CHARGE	WA	43	-	-	-	-	-	-	-	-
4511000	ACCOUNT SERV CHG	301825	MISC SERV REV-ACCT SERVICE CHARGE	WYP	91	-	-	43	-	-	-	-	-
4511000	ACCOUNT SERV CHG	301825	MISC SERV REV-ACCT SERVICE CHARGE	WYU	6	-	-	-	6	-	-	-	-
4511000	ACCOUNT SERV CHG	301855	Misc Service Revenue - CSS (Non-FLT)	CA	8	8	-	-	-	-	-	-	-
4511000	ACCOUNT SERV CHG	301855	Misc Service Revenue - CSS (Non-FLT)	IDU	33	-	-	-	-	-	-	33	-
4511000	ACCOUNT SERV CHG	301855	Misc Service Revenue - CSS (Non-FLT)	OR	178	-	178	-	-	-	-	-	-
4511000	ACCOUNT SERV CHG	301855	Misc Service Revenue - CSS (Non-FLT)	UT	405	-	-	-	-	405	-	-	-
4511000	ACCOUNT SERV CHG	301855	Misc Service Revenue - CSS (Non-FLT)	WA	41	-	-	41	-	-	-	-	-
4511000	ACCOUNT SERV CHG	301855	Misc Service Revenue - CSS (Non-FLT)	WYP	77	-	-	-	77	-	-	-	-
4511000	ACCOUNT SERV CHG	301855	Misc Service Revenue - CSS (Non-FLT)	WYU	8	-	-	-	8	-	-	-	-
<b>4511000 Total</b>					<b>5,800</b>	<b>431</b>	<b>1,149</b>	<b>85</b>	<b>182</b>	<b>3,867</b>	<b>87</b>	<b>-</b>	<b>-</b>
4511500	CUSTOMER BILL CR	301856	Customer Bill Credits - Retail	CA	(1)	(1)	-	-	-	-	-	-	-
4511500	CUSTOMER BILL CR	301856	Customer Bill Credits - Retail	IDU	(4)	-	-	-	-	-	-	(4)	-
4511500	CUSTOMER BILL CR	301856	Customer Bill Credits - Retail	OR	(32)	-	(32)	-	-	-	-	-	-
4511500	CUSTOMER BILL CR	301856	Customer Bill Credits - Retail	UT	(53)	-	-	-	-	-	(53)	-	-
4511500	CUSTOMER BILL CR	301856	Customer Bill Credits - Retail	WA	(6)	-	-	(6)	-	-	-	-	-
4511500	CUSTOMER BILL CR	301856	Customer Bill Credits - Retail	WYP	(5)	-	-	-	(5)	-	-	-	-
4511500	CUSTOMER BILL CR	301856	Customer Bill Credits - Retail	WYU	(1)	-	-	-	(1)	-	-	-	-
<b>4511500 Total</b>					<b>(102)</b>	<b>(1)</b>	<b>(32)</b>	<b>(6)</b>	<b>(6)</b>	<b>(53)</b>	<b>(4)</b>	<b>-</b>	<b>-</b>



Electric Operations Revenue (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4512000	TAMPER/RECONNECT	301826	TAMPERING/UNAUTHORIZED RECONNECTION CHG	CA	0	0	-	-	-	-	-
4512000	TAMPER/RECONNECT	301826	TAMPERING/UNAUTHORIZED RECONNECTION CHG	OR	4	-	4	-	-	-	-
4512000	TAMPER/RECONNECT	301826	TAMPERING/UNAUTHORIZED RECONNECTION CHG	SO	0	0	0	0	0	0	0
4512000	TAMPER/RECONNECT	301826	TAMPERING/UNAUTHORIZED RECONNECTION CHG	UT	1	-	-	-	1	-	-
4512000	TAMPER/RECONNECT	301826	TAMPERING/UNAUTHORIZED RECONNECTION CHG	WA	0	-	-	0	-	-	-
4512000	TAMPER/RECONNECT	301826	TAMPERING/UNAUTHORIZED RECONNECTION CHG	WYP	0	-	-	0	-	-	-
<b>4512000 Total</b>					<b>6</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>
4513000	OTHER	301828	OTHER	CA	43	43	-	-	-	-	-
4513000	OTHER	301828	OTHER	IDU	18	-	-	-	-	18	-
4513000	OTHER	301828	OTHER	OR	412	-	412	-	-	-	-
4513000	OTHER	301828	OTHER	SO	52	1	14	4	7	23	3
4513000	OTHER	301828	OTHER	UT	715	-	-	-	-	715	-
4513000	OTHER	301828	OTHER	WA	380	-	-	380	-	-	-
4513000	OTHER	301828	OTHER	WYP	185	-	-	-	185	-	-
4513000	OTHER	301828	OTHER	WYU	10	-	-	-	10	-	-
4513000	OTHER	301840	Miscellaneous Service Revenue	CA	7	7	-	-	-	-	-
4513000	OTHER	301840	Miscellaneous Service Revenue	IDU	22	-	-	-	-	22	-
4513000	OTHER	301840	Miscellaneous Service Revenue	OR	13	-	13	-	-	-	-
4513000	OTHER	301840	Miscellaneous Service Revenue	UT	663	-	-	-	-	663	-
4513000	OTHER	301840	Miscellaneous Service Revenue	WA	40	-	-	40	-	-	-
<b>4513000 Total</b>					<b>2,559</b>	<b>51</b>	<b>439</b>	<b>424</b>	<b>202</b>	<b>1,400</b>	<b>42</b>
4514100	ENERGY FINANSWER	301836	ENERGY FINAN - NEW COMM	UT	0	-	-	-	-	0	-
<b>4514100 Total</b>					<b>0</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>0</b>	<b>-</b>
4530000	SLS WATER & W PWR	358900	Sales of Water & Water Power	SG	7	0	2	1	1	3	0
<b>4530000 Total</b>					<b>7</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>0</b>
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	CA	3	3	-	-	-	-	-
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	IDU	1	-	-	-	-	1	-
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	OR	861	-	861	-	-	-	-
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	SG	901	13	234	70	128	401	54
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	SO	2,540	56	689	195	333	1,119	148
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	UT	1,364	-	-	-	-	1,364	-
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	WA	11	-	-	11	-	-	-
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	WYP	14	-	-	-	14	-	-
4541000	RENTS - COMMON	301860	RENT FROM ELEC PROP	WYU	18	-	-	-	18	-	-
4541000	RENTS - COMMON	301864	REVENUE - JOINT USE OF POLES	CA	483	483	-	-	-	-	-
4541000	RENTS - COMMON	301864	REVENUE - JOINT USE OF POLES	IDU	164	-	-	-	-	164	-
4541000	RENTS - COMMON	301864	REVENUE - JOINT USE OF POLES	OR	2,856	-	2,856	-	-	-	-
4541000	RENTS - COMMON	301864	REVENUE - JOINT USE OF POLES	UT	1,976	-	-	-	-	1,976	-
4541000	RENTS - COMMON	301864	REVENUE - JOINT USE OF POLES	WA	691	-	-	691	-	-	-
4541000	RENTS - COMMON	301864	REVENUE - JOINT USE OF POLES	WYP	324	-	-	-	324	-	-
4541000	RENTS - COMMON	301866	JOINT USE SANCTIONS & FINES REVENUE	OR	3	-	3	-	-	-	-
4541000	RENTS - COMMON	301866	JOINT USE SANCTIONS & FINES REVENUE	SG	2	0	0	0	0	1	0
4541000	RENTS - COMMON	301866	JOINT USE SANCTIONS & FINES REVENUE	UT	1	-	-	-	-	1	-
4541000	RENTS - COMMON	301866	JOINT USE SANCTIONS & FINES REVENUE	WA	0	-	-	0	-	-	-
4541000	RENTS - COMMON	301866	JOINT USE SANCTIONS & FINES REVENUE	WYP	5	-	-	-	5	-	-
4541000	RENTS - COMMON	301867	JOINT USE PROGRAM REIMBURSE REVENUE	CA	8	8	-	-	-	-	-
4541000	RENTS - COMMON	301867	JOINT USE PROGRAM REIMBURSE REVENUE	IDU	0	-	-	-	-	0	-
4541000	RENTS - COMMON	301867	JOINT USE PROGRAM REIMBURSE REVENUE	OR	234	-	234	-	-	-	-
4541000	RENTS - COMMON	301867	JOINT USE PROGRAM REIMBURSE REVENUE	UT	254	-	-	-	-	254	-
4541000	RENTS - COMMON	301867	JOINT USE PROGRAM REIMBURSE REVENUE	WA	48	-	-	48	-	-	-
4541000	RENTS - COMMON	301867	JOINT USE PROGRAM REIMBURSE REVENUE	WYP	10	-	-	-	10	-	-
4541000	RENTS - COMMON	301869	UNCOLLECTIBLE REVENUE JOINT USE	CA	4	4	-	-	-	-	-
4541000	RENTS - COMMON	301869	UNCOLLECTIBLE REVENUE JOINT USE	IDU	(0)	-	-	-	-	(0)	-
4541000	RENTS - COMMON	301869	UNCOLLECTIBLE REVENUE JOINT USE	OR	(60)	-	(60)	-	-	-	-
4541000	RENTS - COMMON	301869	UNCOLLECTIBLE REVENUE JOINT USE	UT	(6)	-	-	-	-	(6)	-
4541000	RENTS - COMMON	301869	UNCOLLECTIBLE REVENUE JOINT USE	WA	(4)	-	-	(4)	-	-	-
4541000	RENTS - COMMON	301869	UNCOLLECTIBLE REVENUE JOINT USE	WYP	1	-	-	-	1	-	-
4541000	RENTS - COMMON	301870	RENT REV - STEAM	SG	4	0	1	0	1	2	0
4541000	RENTS - COMMON	301872	RENT REV - TRANS	SG	468	7	122	37	66	208	28
4541000	RENTS - COMMON	301873	RENT REV - DIST	SO	0	0	0	0	0	0	0
4541000	RENTS - COMMON	301874	RENT REV - GENERAL	SG	13	0	3	1	2	6	1
4541000	RENTS - COMMON	301874	RENT REV - GENERAL	SO	3	0	1	0	0	1	0
4541000	RENTS - COMMON	301878	JOINT USE BACK RENT	OR	1	-	1	-	-	-	-
4541000	RENTS - COMMON	301879	Joint Use Contracted Program Reimburse	CA	34	34	-	-	-	-	-
4541000	RENTS - COMMON	301879	Joint Use Contracted Program Reimburse	IDU	5	-	-	-	-	5	-
4541000	RENTS - COMMON	301879	Joint Use Contracted Program Reimburse	OR	712	-	712	-	-	-	-
4541000	RENTS - COMMON	301879	Joint Use Contracted Program Reimburse	UT	51	-	-	-	-	51	-
4541000	RENTS - COMMON	301879	Joint Use Contracted Program Reimburse	WA	159	-	-	159	-	-	-
4541000	RENTS - COMMON	301879	Joint Use Contracted Program Reimburse	WYP	11	-	-	-	11	-	-
4541000	RENTS - COMMON	301885	RENT REVENUE - SUBLE	SO	599	13	163	46	79	264	35
4541000	RENTS - COMMON	301886	Rent Revenue - Subleases - Operating	SG	116	2	30	9	16	52	7
<b>4541000 Total</b>					<b>14,882</b>	<b>623</b>	<b>5,850</b>	<b>1,262</b>	<b>1,008</b>	<b>5,694</b>	<b>443</b>
4543000	MCI FOGWIRE REVENUES	301863	MCI FIBER OPTIC GROUND WIRE REVENUES	SG	3,355	49	872	262	475	1,494	201



Electric Operations Revenue (Actuals)  
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Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
<b>4543000 Total</b>			<b>3,355</b>	<b>49</b>	<b>872</b>	<b>262</b>	<b>475</b>	<b>1,494</b>	<b>201</b>	<b>1</b>	<b>-</b>
4545000	VERT BRIDGE REVENUES	367222	9	0	2	1	1	4	1	0	-
<b>4545000 Total</b>			<b>9</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>-</b>
4561100	Other Wheeling Rev	301953	2,158	32	561	169	305	961	129	1	-
4561100	Other Wheeling Rev	301963	2,316	34	602	181	328	1,032	139	1	-
4561100	Other Wheeling Rev	301966	418	6	109	33	59	186	25	0	-
4561100	Other Wheeling Rev	301967	2,694	39	700	211	381	1,200	161	1	-
4561100	Other Wheeling Rev	301969	2,356	34	613	184	334	1,050	141	1	-
4561100	Other Wheeling Rev	301973	2,118	31	551	166	300	943	127	1	-
4561100	Other Wheeling Rev	301974	4,430	65	1,152	346	627	1,974	265	1	-
4561100	Other Wheeling Rev	302082	0	0	0	0	0	0	0	0	-
4561100	Other Wheeling Rev	302092	0	0	0	0	0	0	0	0	-
4561100	Other Wheeling Rev	302831	33	0	9	3	5	15	2	0	-
4561100	Other Wheeling Rev	302901	721	11	188	56	102	321	43	0	-
4561100	Other Wheeling Rev	302982	466	7	121	36	66	208	28	0	-
4561100	Other Wheeling Rev	302983	352	5	92	28	50	157	21	0	-
<b>4561100 Total</b>			<b>18,065</b>	<b>264</b>	<b>4,697</b>	<b>1,412</b>	<b>2,557</b>	<b>8,047</b>	<b>1,082</b>	<b>5</b>	<b>-</b>
4561910	S/T FIRM WHEEL REV	301926	3,177	46	826	248	450	1,415	190	1	-
<b>4561910 Total</b>			<b>3,177</b>	<b>46</b>	<b>826</b>	<b>248</b>	<b>450</b>	<b>1,415</b>	<b>190</b>	<b>1</b>	<b>-</b>
4561920	L/T FIRM WHEEL REV	301912	15,441	226	4,015	1,207	2,186	6,878	925	5	-
4561920	L/T FIRM WHEEL REV	301916	7,434	109	1,933	581	1,052	3,311	445	2	-
4561920	L/T FIRM WHEEL REV	301917	24,715	362	6,426	1,932	3,498	11,009	1,480	7	-
4561920	L/T FIRM WHEEL REV	302980	38,959	570	10,130	3,046	5,514	17,354	2,333	11	-
<b>4561920 Total</b>			<b>86,548</b>	<b>1,267</b>	<b>22,504</b>	<b>6,767</b>	<b>12,250</b>	<b>38,552</b>	<b>5,184</b>	<b>25</b>	<b>-</b>
4561930	NON-FIRM WHEEL REV	301922	26,514	373	6,607	1,945	4,068	11,819	1,693	9	-
4561930	NON-FIRM WHEEL REV	302822	10	0	2	1	2	4	1	0	-
<b>4561930 Total</b>			<b>26,524</b>	<b>373</b>	<b>6,610</b>	<b>1,945</b>	<b>4,070</b>	<b>11,824</b>	<b>1,694</b>	<b>9</b>	<b>-</b>
4561990	TRANSMN REV REFUND	301913	(4,553)	(67)	(1,184)	(356)	(644)	(2,028)	(273)	(1)	-
<b>4561990 Total</b>			<b>(4,553)</b>	<b>(67)</b>	<b>(1,184)</b>	<b>(356)</b>	<b>(644)</b>	<b>(2,028)</b>	<b>(273)</b>	<b>(1)</b>	<b>-</b>
4562100	USE OF FACIL REV	301911	19	0	5	1	3	8	1	0	-
<b>4562100 Total</b>			<b>19</b>	<b>0</b>	<b>5</b>	<b>1</b>	<b>3</b>	<b>8</b>	<b>1</b>	<b>0</b>	<b>-</b>
4562300	MISC OTHER REV	301900	2	0	1	0	0	1	0	0	-
4562300	MISC OTHER REV	301900	16	-	-	-	-	16	-	-	-
4562300	MISC OTHER REV	301900	0	-	-	-	0	-	-	-	-
4562300	MISC OTHER REV	301901	(30)	-	-	(30)	-	-	-	-	-
4562300	MISC OTHER REV	301915	1,476	22	384	115	209	658	88	0	-
4562300	MISC OTHER REV	301939	(16)	(0)	(4)	(1)	(2)	(7)	(1)	(0)	-
4562300	MISC OTHER REV	301940	12,187	178	3,169	953	1,725	5,429	730	4	-
4562300	MISC OTHER REV	301949	636	9	165	50	90	283	38	0	-
4562300	MISC OTHER REV	301951	89	1	23	7	13	40	5	0	-
4562300	MISC OTHER REV	301955	113	-	-	-	113	-	-	-	-
4562300	MISC OTHER REV	301958	(287)	(4)	(75)	(22)	(41)	(128)	(17)	(0)	-
4562300	MISC OTHER REV	301959	10,822	158	2,814	846	1,532	4,821	648	3	-
4562300	MISC OTHER REV	361000	168	2	44	13	24	75	10	0	-
4562300	MISC OTHER REV	374400	144	2	37	11	20	64	9	0	-
4562300	MISC OTHER REV	610004	(0)	-	-	-	-	-	-	-	(0)
4562300	MISC OTHER REV	701010	0	-	-	-	-	-	-	-	0
<b>4562300 Total</b>			<b>25,319</b>	<b>369</b>	<b>6,558</b>	<b>1,941</b>	<b>3,683</b>	<b>11,250</b>	<b>1,511</b>	<b>7</b>	<b>-</b>
4562310	EIM - MISCELLANEOUS	308001	15	0	4	1	2	7	1	0	-
<b>4562310 Total</b>			<b>15</b>	<b>0</b>	<b>4</b>	<b>1</b>	<b>2</b>	<b>7</b>	<b>1</b>	<b>0</b>	<b>-</b>
4562400	M&S INVENTORY SALES	362950	4	0	1	0	1	2	0	0	-
4562400	M&S INVENTORY SALES	362950	(2,863)	(63)	(777)	(219)	(376)	(1,261)	(167)	(1)	-
4562400	M&S INVENTORY SALES	362950	3,319	-	-	-	-	3,319	-	-	-
4562400	M&S INVENTORY SALES	362950	75	-	-	-	75	-	-	-	-
<b>4562400 Total</b>			<b>536</b>	<b>(63)</b>	<b>(776)</b>	<b>(219)</b>	<b>(300)</b>	<b>2,060</b>	<b>(167)</b>	<b>(1)</b>	<b>-</b>
4562500	M&S INV COST OF SALE	514950	(521)	-	-	-	-	(521)	-	-	-
<b>4562500 Total</b>			<b>(521)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(521)</b>	<b>-</b>	<b>-</b>	<b>-</b>
4562700	RNW ENRGY CRDT SALES	301943	(2,739)	(40)	(712)	(214)	(388)	(1,220)	(164)	(1)	-
4562700	RNW ENRGY CRDT SALES	301944	190	2	39	12	21	67	9	0	-
4562700	RNW ENRGY CRDT SALES	301945	8,884	130	2,310	695	1,257	3,957	532	3	-
4562700	RNW ENRGY CRDT SALES	352943	1,225	-	-	-	-	-	-	-	1,225
4562700	RNW ENRGY CRDT SALES	352950	0	0	0	0	0	0	0	0	-
4562700	RNW ENRGY CRDT SALES	354945	2,338	-	-	-	-	-	-	-	2,338
<b>4562700 Total</b>			<b>9,858</b>	<b>92</b>	<b>1,637</b>	<b>492</b>	<b>891</b>	<b>2,804</b>	<b>377</b>	<b>2</b>	<b>3,563</b>
4562800	CA GHG Emission Allo	352001	12,039	-	-	-	-	-	-	-	12,039
4562800	CA GHG Emission Allo	352002	(12,039)	-	-	-	-	-	-	-	(12,039)
4562800	CA GHG Emission Allo	352003	7,180	-	-	-	-	-	-	-	7,180
4562800	CA GHG Emission Allo	352004	118	-	-	-	-	-	-	-	118
<b>4562800 Total</b>			<b>7,299</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>7,299</b>
4563500	Oth Elec Rev-Def Tm	305990	(5,897)	-	(5,897)	-	-	-	-	-	-
4563500	Oth Elec Rev-Def Tm	305991	31,698	-	31,698	-	-	-	-	-	-
<b>4563500 Total</b>			<b>25,801</b>	<b>-</b>	<b>25,801</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Grand Total Electric Operations Revenue</b>			<b>5,521,910</b>	<b>108,333</b>	<b>1,434,457</b>	<b>380,390</b>	<b>654,359</b>	<b>2,484,065</b>	<b>329,858</b>	<b>12,607</b>	<b>117,840</b>



Electric Operations Revenue (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4118000	GAINS-DISP OF ALLOW	0									
	SO2 ALLOWANCE		SE	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
<b>4118000 Total</b>				<b>(0)</b>	<b>(0)</b>	<b>(0)</b>	<b>(0)</b>	<b>(0)</b>	<b>(0)</b>	<b>(0)</b>	<b>(0)</b>
4211000	GAIN DISPOS PROP	554000		511	-	511	-	-	-	-	-
	GAIN ON DISPOSITION OF PROPERTY		OR								
4211000	GAIN DISPOS PROP	554000		(2,245)	(48)	(629)	(176)	(288)	(978)	(125)	(1)
	GAIN ON DISPOSITION OF PROPERTY		SO								
<b>4211000 Total</b>				<b>(1,734)</b>	<b>(48)</b>	<b>(118)</b>	<b>(176)</b>	<b>(288)</b>	<b>(978)</b>	<b>(125)</b>	<b>(1)</b>
<b>Grand Total Miscellaneous Revenue</b>				<b>(1,734)</b>	<b>(48)</b>	<b>(118)</b>	<b>(176)</b>	<b>(288)</b>	<b>(978)</b>	<b>(125)</b>	<b>(1)</b>



# **B2. O&M EXPENSE**



Operations & Maintenance Expense (Actuals)  
 S/n of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Group Code	Secondary Group Code Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
50000000	OPER SUPV & ENG	STEX	Steam O&M Expense	SG	14,521	213	3,776	1,135	2,055	6,468	870	4	-
50000000	OPER SUPV & ENG	STEX	Steam O&M Expense	SG	14,521	213	3,776	1,135	2,055	6,468	870	4	-
50010000	FUEL CONSUMED	NPCX	Net Power Cost Expense	SE	2,910	41	725	213	447	1,297	186	1	-
50100000	FUEL CONSUMED-COAL	NPCX	Net Power Cost Expense	SE	68,726	8,114	161,663	47,581	99,536	289,183	41,429	219	-
50100000	FUEL CONSUMED-COAL	NPCX	Net Power Cost Expense	SE	68,726	8,114	161,663	47,581	99,536	289,183	41,429	219	-
50112000	FUEL - OVRBDN AMORT	STEX	Steam O&M Expense	IDU	36	-	-	-	101	-	36	-	-
50112000	FUEL - OVRBDN AMORT	STEX	Steam O&M Expense	WYP	137	-	-	-	101	-	36	-	-
50113000	FUEL-COAL DC UMWA PE	STEX	Steam O&M Expense	SE	1,422	20	354	104	218	634	91	0	-
50113000	FUEL REG CST DFRLAM	STEX	Steam O&M Expense	IDU	1,286	-	-	-	-	-	1,286	-	-
50113000	FUEL REG CST DFRLAM	OR	Steam O&M Expense	OR	4,921	-	4,921	-	-	-	-	-	-
50115000	FUEL REG CST DFRLAM	STEX	Steam O&M Expense	SE	3,129	44	780	230	480	1,385	200	1	-
50115000	FUEL REG CST DFRLAM	STEX	Steam O&M Expense	SE	9,336	44	5,701	230	480	1,385	1,486	1	-
50120000	FUEL HAND-COAL	STEX	Steam O&M Expense	SE	6,651	93	1,658	488	1,021	2,965	425	2	-
50120000	FUEL HAND-COAL	STEX	Steam O&M Expense	SE	6,651	93	1,658	488	1,021	2,965	425	2	-
50130000	START UP FUEL - GAS	NPCX	Net Power Cost Expense	SE	240	3	60	18	37	107	15	0	-
50130000	START UP FUEL - GAS	NPCX	Net Power Cost Expense	SE	240	3	60	18	37	107	15	0	-
50135000	FUEL CONSUMED-GAS	NPCX	Net Power Cost Expense	SE	18,261	257	4,551	1,339	2,802	8,140	1,166	6	-
50135000	FUEL CONSUMED-GAS	NPCX	Net Power Cost Expense	SE	18,261	257	4,551	1,339	2,802	8,140	1,166	6	-
50140000	FUEL CONSUMED-DIESEL	NPCX	Net Power Cost Expense	SE	5	0	1	1	0	2	0	0	-
50140000	FUEL CONSUMED-DIESEL	NPCX	Net Power Cost Expense	SE	5	0	1	1	0	2	0	0	-
50145000	START UP FUEL-DIESEL	NPCX	Net Power Cost Expense	SE	4,021	56	1,002	295	617	1,793	257	1	-
50145000	START UP FUEL-DIESEL	NPCX	Net Power Cost Expense	SE	4,021	56	1,002	295	617	1,793	257	1	-
50150000	FUEL CONS-RES DISP	NPCX	Net Power Cost Expense	SE	61	1	15	4	9	27	4	0	-
50150000	FUEL CONS-RES DISP	NPCX	Net Power Cost Expense	SE	61	1	15	4	9	27	4	0	-
50151000	ASH & ASH BYPRD SALE	NPCX	Net Power Cost Expense	SE	2	0	1	0	0	1	0	0	-
50151000	ASH & ASH BYPRD SALE	NPCX	Net Power Cost Expense	SE	2	0	1	0	0	1	0	0	-
50200000	STEAM EXPENSES	STEX	Steam O&M Expense	SG	41,579	608	10,811	3,251	5,885	18,521	2,490	12	-
50200000	STEAM EXPENSES	STEX	Steam O&M Expense	SG	41,579	608	10,811	3,251	5,885	18,521	2,490	12	-
50220000	STM EXP - FLYASH	STEX	Steam O&M Expense	SG	7,447	109	1,936	582	1,054	3,317	446	2	-
50220000	STM EXP - FLYASH	STEX	Steam O&M Expense	SG	7,447	109	1,936	582	1,054	3,317	446	2	-
50230000	STM EXP BOTTOM ASH	STEX	Steam O&M Expense	SG	1,000	15	260	78	142	445	60	0	-
50230000	STM EXP BOTTOM ASH	STEX	Steam O&M Expense	SG	1,000	15	260	78	142	445	60	0	-
50240000	STM EXP SCRUBBER	STEX	Steam O&M Expense	SG	11,796	173	3,067	922	1,670	5,254	706	3	-
50240000	STM EXP SCRUBBER	STEX	Steam O&M Expense	SG	11,796	173	3,067	922	1,670	5,254	706	3	-
50290000	STM EXP - OTHER	STEX	Steam O&M Expense	SG	18,300	268	4,758	1,431	2,590	8,152	1,096	5	-
50300000	STEAM FRM OTH SRCS	NPCX	Net Power Cost Expense	SE	5,120	72	1,276	376	786	2,282	327	2	-
50300000	STEAM FRM OTH SRCS	NPCX	Net Power Cost Expense	SE	5,120	72	1,276	376	786	2,282	327	2	-
50500000	ELECTRIC EXPENSES	STEX	Steam O&M Expense	SG	1,120	16	291	88	159	499	67	0	-
50500000	ELECTRIC EXPENSES	STEX	Steam O&M Expense	SG	1,120	16	291	88	159	499	67	0	-
50510000	ELEC EXP GENERAL	STEX	Steam O&M Expense	SG	53	1	14	4	8	24	3	0	-
50510000	ELEC EXP GENERAL	STEX	Steam O&M Expense	SG	53	1	14	4	8	24	3	0	-
50600000	MISC STEAM PWR EXP	STEX	Steam O&M Expense	SG	78,051	1,142	20,295	6,102	11,047	34,767	4,675	23	-
50600000	MISC STEAM PWR EXP	STEX	Steam O&M Expense	SG	78,051	1,142	20,295	6,102	11,047	34,767	4,675	23	-
50610000	MISC STM EXP - CON	STEX	Steam O&M Expense	SG	1,717	25	446	134	243	765	103	1	-
50610000	MISC STM EXP - CON	STEX	Steam O&M Expense	SG	1,717	25	446	134	243	765	103	1	-
50611000	MISC STM EXP PLGLU	STEX	Steam O&M Expense	SG	1,826	27	475	143	259	814	109	1	-
50611000	MISC STM EXP PLGLU	STEX	Steam O&M Expense	SG	1,826	27	475	143	259	814	109	1	-
50612000	MISC STM EXP UNMITG	STEX	Steam O&M Expense	SG	7	0	2	1	1	3	0	0	-
50612000	MISC STM EXP UNMITG	STEX	Steam O&M Expense	SG	7	0	2	1	1	3	0	0	-
50613000	MISC STM EXP COMPT	STEX	Steam O&M Expense	SG	531	8	138	41	75	236	32	0	-
50613000	MISC STM EXP COMPT	STEX	Steam O&M Expense	SG	531	8	138	41	75	236	32	0	-
50614000	MISC STM EXP OFFIC	STEX	Steam O&M Expense	SG	1,450	21	377	113	205	646	87	0	-
50614000	MISC STM EXP OFFIC	STEX	Steam O&M Expense	SG	1,450	21	377	113	205	646	87	0	-
50615000	MISC STM EXP COMM	STEX	Steam O&M Expense	SG	198	3	52	16	28	88	12	0	-
50615000	MISC STM EXP COMM	STEX	Steam O&M Expense	SG	198	3	52	16	28	88	12	0	-
50620000	MISC STM - ENVRMNT	STEX	Steam O&M Expense	SG	3,512	51	913	275	497	1,564	210	1	-
50620000	MISC STM - ENVRMNT	STEX	Steam O&M Expense	SG	3,512	51	913	275	497	1,564	210	1	-
50630000	MISC STEAM JVA CR	STEX	Steam O&M Expense	SG	(36,143)	(529)	(9,398)	(2,826)	(5,116)	(16,100)	(2,165)	(11)	-



Operations & Maintenance Expense (Actuals)  
 S/n of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Group Code	Secondary Group Code Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
					(36,143)	(529)	(9,398)	(2,826)	(5,116)	(16,100)	(2,165)		(11)
5063000	Total			SG	13	0	3	1	2	6	1	0	-
5064000	MISC STIM EXP RCRT	STEX	Steam O&M Expense	SG	13	0	3	1	2	6	1	0	-
5064000	Total			SG	13	0	3	1	2	6	1	0	-
5065000	MISC STIM EXP - SEC	STEX	Steam O&M Expense	SG	422	6	110	33	60	188	25	0	-
5065000	Total			SG	422	6	110	33	60	188	25	0	-
5066000	MISC STIM EXP - SFTY	STEX	Steam O&M Expense	SG	836	12	217	65	118	372	50	0	-
5066000	Total			SG	836	12	217	65	118	372	50	0	-
5067000	MISC STIM EXP TRNG	STEX	Steam O&M Expense	SG	3,461	51	900	271	490	1,541	207	1	-
5067000	Total			SG	3,461	51	900	271	490	1,541	207	1	-
5069000	MISC STIM EXP WTSPLY	STEX	Steam O&M Expense	SG	473	7	123	37	67	211	28	0	-
5069000	Total			SG	473	7	123	37	67	211	28	0	-
5069900	MISC STIM EXP MISC	STEX	Steam O&M Expense	SG	2,473	36	643	193	350	1,102	148	1	-
5069900	Total			SG	2,473	36	643	193	350	1,102	148	1	-
5070000	RENITS (STEAM GEN)	STEX	Steam O&M Expense	SG	467	7	121	37	66	208	28	0	-
5070000	Total			SG	467	7	121	37	66	208	28	0	-
5100000	MNT SUPRVY & ENG	STEX	Steam O&M Expense	SG	2,880	42	749	225	408	1,283	173	1	-
5100000	Total			SG	2,880	42	749	225	408	1,283	173	1	-
5101000	MNTNCE SUPVSN & ENG	STEX	Steam O&M Expense	SG	4,174	61	1,085	326	591	1,859	250	1	-
5101000	Total			SG	4,174	61	1,085	326	591	1,859	250	1	-
5110000	MNT OF STRUCTURES	STEX	Steam O&M Expense	SG	4,320	63	1,123	338	611	1,924	259	1	-
5110000	Total			SG	4,320	63	1,123	338	611	1,924	259	1	-
5111000	MNT OF STRUCTURES	STEX	Steam O&M Expense	SG	4,005	59	1,041	313	567	1,784	240	1	-
5111000	Total			SG	4,005	59	1,041	313	567	1,784	240	1	-
5111100	MNT STRCT PMP PLNT	STEX	Steam O&M Expense	SG	839	12	218	66	119	374	50	0	-
5111100	Total			SG	839	12	218	66	119	374	50	0	-
5111200	MNT STRCT WASTE WT	STEX	Steam O&M Expense	SG	611	9	159	48	86	272	37	0	-
5111200	Total			SG	611	9	159	48	86	272	37	0	-
5112000	STRUCTURAL SYSTEMS	STEX	Steam O&M Expense	SG	10,335	151	2,687	808	1,463	4,604	619	3	-
5112000	Total			SG	10,335	151	2,687	808	1,463	4,604	619	3	-
5114000	MNT OF STRCT CATH	STEX	Steam O&M Expense	SG	35	1	9	3	5	16	2	0	-
5114000	Total			SG	35	1	9	3	5	16	2	0	-
5116000	MNT STRCT DAM RIVR	STEX	Steam O&M Expense	SG	58	1	15	5	8	26	3	0	-
5116000	Total			SG	58	1	15	5	8	26	3	0	-
5117000	MNT STRCT FIRE PRT	STEX	Steam O&M Expense	SG	1,071	16	279	84	152	477	64	0	-
5117000	Total			SG	1,071	16	279	84	152	477	64	0	-
5118000	MNT STRCT-GROUNDS	STEX	Steam O&M Expense	SG	627	9	163	49	89	279	38	0	-
5118000	Total			SG	627	9	163	49	89	279	38	0	-
5119000	MNT OF STRCT-HVAC	STEX	Steam O&M Expense	SG	1,921	28	500	150	272	856	115	1	-
5119000	Total			SG	1,921	28	500	150	272	856	115	1	-
5119900	MNT OF STRCT-MISC	STEX	Steam O&M Expense	SG	740	11	192	58	105	329	44	0	-
5119900	Total			SG	740	11	192	58	105	329	44	0	-
5120000	MANT OF BOILR PLNT	STEX	Steam O&M Expense	SG	12,615	185	3,280	986	1,786	5,619	756	4	-
5120000	Total			SG	12,615	185	3,280	986	1,786	5,619	756	4	-
5121000	MNT BOILR-AIR HTR	STEX	Steam O&M Expense	SG	5,103	75	1,327	399	722	2,273	306	1	-
5121000	Total			SG	5,103	75	1,327	399	722	2,273	306	1	-
5121100	MNT BOILR-CHEM FD	STEX	Steam O&M Expense	SG	166	2	43	13	23	74	10	0	-
5121100	Total			SG	166	2	43	13	23	74	10	0	-
5121200	MNT BOILR-CL HANDL	STEX	Steam O&M Expense	SG	4,249	62	1,105	332	601	1,893	255	1	-
5121200	Total			SG	4,249	62	1,105	332	601	1,893	255	1	-
5121400	MNT BOIL-DEMINERLZ	STEX	Steam O&M Expense	SG	413	6	107	32	58	184	25	0	-
5121400	Total			SG	413	6	107	32	58	184	25	0	-
5121500	MNT BOIL-EXTRC STM	STEX	Steam O&M Expense	SG	322	5	84	25	46	144	19	0	-
5121500	Total			SG	322	5	84	25	46	144	19	0	-
5121600	MNT BOILR-FLYASH	STEX	Steam O&M Expense	SG	3,656	54	951	286	517	1,629	219	1	-
5121600	Total			SG	3,656	54	951	286	517	1,629	219	1	-
5121700	MNT BOIL-FUEL OIL	STEX	Steam O&M Expense	SG	618	9	161	48	88	275	37	0	-
5121700	Total			SG	618	9	161	48	88	275	37	0	-
5121800	MNT BOIL-FEEDWATR	STEX	Steam O&M Expense	SG	3,610	53	939	282	511	1,608	216	1	-
5121800	Total			SG	3,610	53	939	282	511	1,608	216	1	-
5121900	MNT BOIL-FRZ PRTEC	STEX	Steam O&M Expense	SG	78	1	20	6	11	35	5	0	-
5121900	Total			SG	78	1	20	6	11	35	5	0	-
5122000	MNT BOILR-AUX SYST	STEX	Steam O&M Expense	SG	451	7	117	35	64	201	27	0	-
5122000	Total			SG	451	7	117	35	64	201	27	0	-
5122100	MNT BOILR-MAIN STM	STEX	Steam O&M Expense	SG	2,197	32	571	172	311	979	132	1	-
5122100	Total			SG	2,197	32	571	172	311	979	132	1	-



Operations & Maintenance Expense (Actuals)  
 S/n of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Group Code	Secondary Group Code Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
5122100	Total				2,197	32	571	172	311	979	132		
5122200	MINT BOIL-PLVRZD CL	STEX	Steam O&M Expense	SG	6,187	91	1,609	484	876	2,756	371	2	-
5122200	Total				6,187	91	1,609	484	876	2,756	371	2	-
5122300	MINT BOIL-PRECI/BAG	STEX	Steam O&M Expense	SG	3,011	44	783	235	426	1,341	180	1	-
5122300	Total				3,011	44	783	235	426	1,341	180	1	-
5122400	MINT BOIL-PRTRT WTR	STEX	Steam O&M Expense	SG	287	4	75	22	41	128	17	0	-
5122400	Total				287	4	75	22	41	128	17	0	-
5122500	MINT BOIL-RV OSM/SIS	STEX	Steam O&M Expense	SG	154	2	40	12	22	69	9	0	-
5122500	Total				154	2	40	12	22	69	9	0	-
5122600	MINT BOIL-RHEAT ST	STEX	Steam O&M Expense	SG	465	7	121	36	66	207	28	0	-
5122600	Total				465	7	121	36	66	207	28	0	-
5122800	MINT BOIL-SOOTBLWG	STEX	Steam O&M Expense	SG	2,008	29	522	157	284	894	120	1	-
5122800	Total				2,008	29	522	157	284	894	120	1	-
5122900	MINT BOIL-R-SCRUBBER	STEX	Steam O&M Expense	SG	6,072	89	1,579	475	859	2,705	364	2	-
5122900	Total				6,072	89	1,579	475	859	2,705	364	2	-
5123000	MINT BOIL-R-BOTM ASH	STEX	Steam O&M Expense	SG	2,632	39	684	206	373	1,172	158	1	-
5123000	Total				2,632	39	684	206	373	1,172	158	1	-
5123100	MINT BOIL-WTR TR TMT	STEX	Steam O&M Expense	SG	432	6	112	34	61	193	26	0	-
5123100	Total				432	6	112	34	61	193	26	0	-
5123200	MINT BOIL-ONTL SUPT	STEX	Steam O&M Expense	SG	777	11	202	61	110	346	47	0	-
5123200	Total				777	11	202	61	110	346	47	0	-
5123300	MAINT GEO GATH SYS	STEX	Steam O&M Expense	SG	260	4	68	20	37	116	16	0	-
5123300	Total				260	4	68	20	37	116	16	0	-
5123400	MAINT OF BOILERS	STEX	Steam O&M Expense	SG	1,715	25	446	134	243	764	103	1	-
5123400	Total				1,715	25	446	134	243	764	103	1	-
5124000	MINT BOILR-CONTROLS	STEX	Steam O&M Expense	SG	1,130	17	294	88	160	503	68	0	-
5124000	Total				1,130	17	294	88	160	503	68	0	-
5125000	MINT BOILER-DRAFT	STEX	Steam O&M Expense	SG	2,644	39	687	207	374	1,178	158	1	-
5125000	Total				2,644	39	687	207	374	1,178	158	1	-
5126000	MINT BOILR-FIRESIDE	STEX	Steam O&M Expense	SG	1,430	21	372	112	202	637	86	0	-
5126000	Total				1,430	21	372	112	202	637	86	0	-
5127000	MINT BUR-BEARNG WTR	STEX	Steam O&M Expense	SG	151	2	39	12	21	67	9	0	-
5127000	Total				151	2	39	12	21	67	9	0	-
5128000	MINT BOILR WTR/STMD	STEX	Steam O&M Expense	SG	6,137	90	1,596	480	869	2,734	368	2	-
5128000	Total				6,137	90	1,596	480	869	2,734	368	2	-
5129000	MINT BOIL-COMP AIR	STEX	Steam O&M Expense	SG	326	5	85	25	46	145	19	0	-
5129000	Total				326	5	85	25	46	145	19	0	-
5129900	MAINT BOILER-MISC	STEX	Steam O&M Expense	SG	366	5	95	29	52	163	22	0	-
5129900	Total				366	5	95	29	52	163	22	0	-
5130000	MAINT ELEC PLANT	STEX	Steam O&M Expense	SG	4,008	59	1,042	313	567	1,785	240	1	-
5130000	Total				4,008	59	1,042	313	567	1,785	240	1	-
5131000	MAINT ELEC AC	STEX	Steam O&M Expense	SG	15,840	232	4,119	1,238	2,242	7,056	949	5	-
5131000	Total				15,840	232	4,119	1,238	2,242	7,056	949	5	-
5131100	MAINT/LUBE-OIL SYS	STEX	Steam O&M Expense	SG	656	10	170	51	93	292	39	0	-
5131100	Total				656	10	170	51	93	292	39	0	-
5131300	MAINT/PREVENT ROUT	STEX	Steam O&M Expense	SG	2	0	0	0	0	0	0	0	-
5131300	Total				2	0	0	0	0	0	0	0	-
5131400	MAINT/MAIN TURBINE	STEX	Steam O&M Expense	SG	4,908	72	1,276	384	695	2,186	294	1	-
5131400	Total				4,908	72	1,276	384	695	2,186	294	1	-
5132000	MAINT ALARMS/INFO	STEX	Steam O&M Expense	SG	1,476	22	384	115	209	657	88	0	-
5132000	Total				1,476	22	384	115	209	657	88	0	-
5133000	MAINT/AIR-COOL-CON	STEX	Steam O&M Expense	SG	131	2	34	10	19	58	8	0	-
5133000	Total				131	2	34	10	19	58	8	0	-
5134000	MAINT/COMPNT COOL	STEX	Steam O&M Expense	SG	149	2	39	12	21	66	9	0	-
5134000	Total				149	2	39	12	21	66	9	0	-
5135000	MAINT/COMPNT AUXIL	STEX	Steam O&M Expense	SG	1,022	15	266	80	145	455	61	0	-
5135000	Total				1,022	15	266	80	145	455	61	0	-
5137000	MAINT-COOLING TOWER	STEX	Steam O&M Expense	SG	1,835	27	477	144	260	818	110	1	-
5137000	Total				1,835	27	477	144	260	818	110	1	-
5138000	MAINT-CIRCUL WATER	STEX	Steam O&M Expense	SG	1,101	16	286	86	156	491	66	0	-
5138000	Total				1,101	16	286	86	156	491	66	0	-
5139000	MAINT-ELECT-DC	STEX	Steam O&M Expense	SG	242	4	63	19	34	108	14	0	-
5139000	Total				242	4	63	19	34	108	14	0	-
5139900	MINT ELEC PLT-MISC	STEX	Steam O&M Expense	SG	25	0	6	2	3	11	1	0	-
5139900	Total				25	0	6	2	3	11	1	0	-







Operations & Maintenance Expense (Actuals)  
 S/n of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Group Code	Secondary Group Code Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
5579000 Total					6,789		3,051				3,739		
5579100	OTH EXP-LIQ DAMAGE	PSEX	Power Supply Expense	UT	35						35		
5579100	OTH EXP-LIQ DAMAGE	PSEX	Power Supply Expense	WYU	54					54			
5579100 Total					89					54	35		
5600000	OPER SUPERV & ENG	TNEX	Transmission O&M Expense	SG	8,985	131	2,336	702	1,272	4,002	538		3
5600000 Total					8,985	131	2,336	702	1,272	4,002	538		3
5612000	LD - MONITOR & OPER	TNEX	Transmission O&M Expense	SG	7,132	104	1,854	558	1,009	3,177	427		2
5612000 Total					7,132	104	1,854	558	1,009	3,177	427		2
5614000	SCHED. SVCS CTR & DSP	TNEX	Transmission O&M Expense	SG	327	5	85	26	46	148	20		0
5614000 Total					327	5	85	26	46	148	20		0
5614010	EIM - SCHEDULING SVCS	TNEX	Transmission O&M Expense	SG	754	11	196	59	107	336	45		0
5614010 Total					754	11	196	59	107	336	45		0
5615000	REL PLAN & STDS DEV	TNEX	Transmission O&M Expense	SG	2,306	35	623	187	339	1,067	144		1
5615000 Total					2,306	35	623	187	339	1,067	144		1
5616000	TRANS SVC STUDIES	TNEX	Transmission O&M Expense	SG	132	2	34	10	19	59	8		0
5616000 Total					132	2	34	10	19	59	8		0
5617000	GEN INTERCONCT STUD	TNEX	Transmission O&M Expense	SG	1,250	18	325	98	177	557	75		0
5617000 Total					1,250	18	325	98	177	557	75		0
5618000	REL PLN & STAND SVCS	TNEX	Transmission O&M Expense	SG	5,785	85	1,504	452	819	2,577	346		2
5618000 Total					5,785	85	1,504	452	819	2,577	346		2
5620000	STATION EXP (TRANS)	TNEX	Transmission O&M Expense	SG	3,230	47	840	253	457	1,439	193		1
5620000 Total					3,230	47	840	253	457	1,439	193		1
5630000	OVERHEAD LINE EXP	TNEX	Transmission O&M Expense	SG	961	14	250	75	136	428	98		0
5630000 Total					961	14	250	75	136	428	98		0
5650000	TRNS ELEC BY OTHERS	NPCX	Net Power Cost Expense	SG	(24)	(24)	(6)	(2)	(3)	(11)	(1)		(0)
5650000 Total					(24)	(24)	(6)	(2)	(3)	(11)	(1)		(0)
5650010	EIM - TRANS OF ELEC	NPCX	Net Power Cost Expense	SG	2,287	33	595	179	324	1,019	137		1
5650010 Total					2,287	33	595	179	324	1,019	137		1
5651000	S/T FIRM WHEELING	NPCX	Net Power Cost Expense	SG	6,362	93	1,654	497	900	2,834	381		2
5651000 Total					6,362	93	1,654	497	900	2,834	381		2
5652500	NON-FIRM WHEEL EXP	NPCX	Net Power Cost Expense	SE	15,972	224	3,980	1,171	2,451	7,120	1,020		5
5652500 Total					15,972	224	3,980	1,171	2,451	7,120	1,020		5
5654600	POST-MRG WHEEL EXP	NPCX	Net Power Cost Expense	SG	124,770	1,826	32,442	9,755	17,660	55,577	7,473		36
5654600 Total					124,770	1,826	32,442	9,755	17,660	55,577	7,473		36
5660000	MISC TRANS EXPENSE	TNEX	Transmission O&M Expense	SG	3,609	53	938	282	511	1,608	216		1
5660000 Total					3,609	53	938	282	511	1,608	216		1
5660010	MISC TRANS EXPENSE	TNEX	Transmission O&M Expense	SG	(0)	(0)	(0)	(0)	(0)	(0)	(0)		(0)
5660010 Total					(0)	(0)	(0)	(0)	(0)	(0)	(0)		(0)
5670000	REN-TS-TRANSMISSION	TNEX	Transmission O&M Expense	SG	2,462	36	645	194	351	1,105	149		1
5670000 Total					2,462	36	645	194	351	1,105	149		1
5680000	MINT SUPERV & ENG	TNEX	Transmission O&M Expense	SG	845	12	220	66	120	376	51		0
5680000 Total					845	12	220	66	120	376	51		0
5690000	MAINT OF STRUCTURE	TNEX	Transmission O&M Expense	SG	95	1	25	7	13	42	6		0
5690000 Total					95	1	25	7	13	42	6		0
5692000	MAINT-COMP SW TRANS	TNEX	Transmission O&M Expense	SG	700	10	182	55	99	312	42		0
5692000 Total					700	10	182	55	99	312	42		0
5693000	MAINT-COM EQP TRANS	TNEX	Transmission O&M Expense	SG	4,445	65	1,156	348	629	1,980	266		1
5693000 Total					4,445	65	1,156	348	629	1,980	266		1
5700000	MAINT STATION EQIP	TNEX	Transmission O&M Expense	SG	10,323	151	2,684	807	1,461	4,598	618		3
5700000 Total					10,323	151	2,684	807	1,461	4,598	618		3
5710000	MAINT OVHD LINES	TNEX	Transmission O&M Expense	SG	17,663	258	4,593	1,381	2,500	7,868	1,058		5
5710000 Total					17,663	258	4,593	1,381	2,500	7,868	1,058		5
5720000	MINT UNDERGRD LINES	TNEX	Transmission O&M Expense	SG	170	2	44	13	24	76	10		0
5720000 Total					170	2	44	13	24	76	10		0
5730000	MINT MSC TRANS PLNT	TNEX	Transmission O&M Expense	SG	177	3	46	14	25	79	11		0
5730000 Total					177	3	46	14	25	79	11		0
5800000	OPER SUPERV & ENG	DNEX	Distribution O&M Expense	CA	657	657							
5800000	OPER SUPERV & ENG	DNEX	Distribution O&M Expense	IDU	120								
5800000	OPER SUPERV & ENG	DNEX	Distribution O&M Expense	OR	431								
5800000	OPER SUPERV & ENG	DNEX	Distribution O&M Expense	SNPD	8,122	288	2,150	519	780	3,954	431		
5800000	OPER SUPERV & ENG	DNEX	Distribution O&M Expense	UT	85								
5800000	OPER SUPERV & ENG	DNEX	Distribution O&M Expense	WA	322								
5800000	OPER SUPERV & ENG	DNEX	Distribution O&M Expense	WYP	81								
5800000 Total					9,816	944	2,581	841	1,221	4,038	551		
5810000	LOAD DISPATCHING	DNEX	Distribution O&M Expense	SNPD	12,715	450	3,366	813	1,221	6,190	676		







Operations & Maintenance Expense (Actuals)  
 S in Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Group Code	Secondary Group Code Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
5910000	MAINT OF STRUCTURE	DNEX	Distribution O&M Expense	OR	500	500	-	-	-	-	-	-	-
5910000	MAINT OF STRUCTURE	DNEX	Distribution O&M Expense	SNPD	2	16	4	6	29	3	-	-	-
5910000	MAINT OF STRUCTURE	DNEX	Distribution O&M Expense	UT	608	-	-	608	-	-	-	-	-
5910000	MAINT OF STRUCTURE	DNEX	Distribution O&M Expense	WA	127	-	-	127	-	-	-	-	-
5910000	MAINT OF STRUCTURE	DNEX	Distribution O&M Expense	WYP	158	-	-	158	-	-	-	-	-
5910000	MAINT OF STRUCTURE	DNEX	Distribution O&M Expense	WYU	58	-	-	58	-	-	-	-	-
<b>5910000 Total</b>					<b>1,816</b>	<b>181</b>	<b>516</b>	<b>131</b>	<b>221</b>	<b>637</b>	<b>130</b>		
5920000	MAINT STAT EQUIP	DNEX	Distribution O&M Expense	CA	329	329	-	-	-	-	-	-	-
5920000	MAINT STAT EQUIP	DNEX	Distribution O&M Expense	IDU	405	-	-	-	-	-	-	-	-
5920000	MAINT STAT EQUIP	DNEX	Distribution O&M Expense	OR	2,723	-	2,723	-	-	-	-	-	-
5920000	MAINT STAT EQUIP	DNEX	Distribution O&M Expense	SNPD	1,565	55	414	100	150	762	83	-	-
5920000	MAINT STAT EQUIP	DNEX	Distribution O&M Expense	UT	2,154	-	-	-	-	2,154	-	-	-
5920000	MAINT STAT EQUIP	DNEX	Distribution O&M Expense	WA	635	-	-	635	-	-	-	-	-
5920000	MAINT STAT EQUIP	DNEX	Distribution O&M Expense	WYP	927	-	-	927	-	-	-	-	-
5920000	MAINT STAT EQUIP	DNEX	Distribution O&M Expense	WYU	27	-	-	27	-	-	-	-	-
<b>5920000 Total</b>					<b>8,765</b>	<b>384</b>	<b>3,137</b>	<b>735</b>	<b>1,104</b>	<b>2,916</b>	<b>488</b>		
5930000	MAINT OVHD LINES	DNEX	Distribution O&M Expense	CA	8,760	8,760	-	-	-	-	-	-	-
5930000	MAINT OVHD LINES	DNEX	Distribution O&M Expense	IDU	3,561	-	-	-	-	-	3,561	-	-
5930000	MAINT OVHD LINES	DNEX	Distribution O&M Expense	OR	54,803	-	54,803	-	-	-	-	-	-
5930000	MAINT OVHD LINES	DNEX	Distribution O&M Expense	SNPD	2,450	87	649	157	235	1,193	130	-	-
5930000	MAINT OVHD LINES	DNEX	Distribution O&M Expense	UT	30,083	-	-	-	-	30,083	-	-	-
5930000	MAINT OVHD LINES	DNEX	Distribution O&M Expense	WA	5,970	-	-	5,970	-	-	-	-	-
5930000	MAINT OVHD LINES	DNEX	Distribution O&M Expense	WYP	5,049	-	-	5,049	-	-	-	-	-
5930000	MAINT OVHD LINES	DNEX	Distribution O&M Expense	WYU	758	-	-	758	-	-	-	-	-
<b>5930000 Total</b>					<b>111,434</b>	<b>8,847</b>	<b>55,452</b>	<b>6,127</b>	<b>6,043</b>	<b>31,275</b>	<b>3,691</b>		
5931000	MAINT O/H LINES-LB P	DNEX	Distribution O&M Expense	CA	31	31	-	-	-	-	-	-	-
5931000	MAINT O/H LINES-LB P	DNEX	Distribution O&M Expense	IDU	50	-	-	-	-	-	50	-	-
5931000	MAINT O/H LINES-LB P	DNEX	Distribution O&M Expense	OR	223	-	223	-	-	-	-	-	-
5931000	MAINT O/H LINES-LB P	DNEX	Distribution O&M Expense	UT	902	-	-	-	-	902	-	-	-
5931000	MAINT O/H LINES-LB P	DNEX	Distribution O&M Expense	WA	28	-	-	28	-	-	-	-	-
5931000	MAINT O/H LINES-LB P	DNEX	Distribution O&M Expense	WYP	95	-	-	95	-	-	-	-	-
5931000	MAINT O/H LINES-LB P	DNEX	Distribution O&M Expense	WYU	28	-	-	28	-	-	-	-	-
<b>5931000 Total</b>					<b>1,328</b>	<b>31</b>	<b>223</b>	<b>28</b>	<b>95</b>	<b>902</b>	<b>50</b>		
5940000	MAINT UDGRND LINES	DNEX	Distribution O&M Expense	CA	460	460	-	-	-	-	-	-	-
5940000	MAINT UDGRND LINES	DNEX	Distribution O&M Expense	IDU	995	-	-	-	-	-	995	-	-
5940000	MAINT UDGRND LINES	DNEX	Distribution O&M Expense	OR	7,107	-	7,107	-	-	-	-	-	-
5940000	MAINT UDGRND LINES	DNEX	Distribution O&M Expense	SNPD	23	1	6	1	2	11	1	-	-
5940000	MAINT UDGRND LINES	DNEX	Distribution O&M Expense	UT	16,832	-	-	-	-	16,832	-	-	-
5940000	MAINT UDGRND LINES	DNEX	Distribution O&M Expense	WA	1,267	-	-	1,267	-	-	-	-	-
5940000	MAINT UDGRND LINES	DNEX	Distribution O&M Expense	WYP	2,075	-	-	2,075	-	-	-	-	-
5940000	MAINT UDGRND LINES	DNEX	Distribution O&M Expense	WYU	252	-	-	252	-	-	-	-	-
<b>5940000 Total</b>					<b>29,012</b>	<b>461</b>	<b>7,113</b>	<b>1,269</b>	<b>2,330</b>	<b>16,843</b>	<b>996</b>		
5950000	MAINT LINE TRANSFRM	DNEX	Distribution O&M Expense	SNPD	1,101	39	291	70	106	536	58	-	-
5960000	MNT STR LGHT-SIG S	DNEX	Distribution O&M Expense	CA	48	48	-	-	-	-	-	-	-
5960000	MNT STR LGHT-SIG S	DNEX	Distribution O&M Expense	IDU	65	-	-	-	-	-	65	-	-
5960000	MNT STR LGHT-SIG S	DNEX	Distribution O&M Expense	OR	689	-	689	-	-	-	-	-	-
5960000	MNT STR LGHT-SIG S	DNEX	Distribution O&M Expense	UT	597	-	-	-	-	597	-	-	-
5960000	MNT STR LGHT-SIG S	DNEX	Distribution O&M Expense	WA	37	-	-	37	-	-	-	-	-
5960000	MNT STR LGHT-SIG S	DNEX	Distribution O&M Expense	WYP	371	-	-	371	-	-	-	-	-
5960000	MNT STR LGHT-SIG S	DNEX	Distribution O&M Expense	WYU	61	-	-	61	-	-	-	-	-
<b>5960000 Total</b>					<b>1,868</b>	<b>48</b>	<b>689</b>	<b>37</b>	<b>432</b>	<b>597</b>	<b>65</b>		
5970000	MNT OF METERS	DNEX	Distribution O&M Expense	CA	16	16	-	-	-	-	-	-	-
5970000	MNT OF METERS	DNEX	Distribution O&M Expense	IDU	34	-	-	-	-	-	34	-	-
5970000	MNT OF METERS	DNEX	Distribution O&M Expense	OR	214	-	214	-	-	-	-	-	-
5970000	MNT OF METERS	DNEX	Distribution O&M Expense	SNPD	27	1	7	2	3	13	1	-	-
5970000	MNT OF METERS	DNEX	Distribution O&M Expense	UT	356	-	-	-	-	356	-	-	-
5970000	MNT OF METERS	DNEX	Distribution O&M Expense	WA	26	-	-	26	-	-	-	-	-
5970000	MNT OF METERS	DNEX	Distribution O&M Expense	WYP	22	-	-	22	-	-	-	-	-
5970000	MNT OF METERS	DNEX	Distribution O&M Expense	WYU	23	-	-	23	-	-	-	-	-
<b>5970000 Total</b>					<b>718</b>	<b>17</b>	<b>221</b>	<b>28</b>	<b>47</b>	<b>369</b>	<b>35</b>		
5980000	MNT MISC DIST PLNT	DNEX	Distribution O&M Expense	CA	100	100	-	-	-	-	-	-	-
5980000	MNT MISC DIST PLNT	DNEX	Distribution O&M Expense	IDU	187	-	-	-	-	-	187	-	-
5980000	MNT MISC DIST PLNT	DNEX	Distribution O&M Expense	OR	(250)	-	(250)	-	-	-	-	-	-
5980000	MNT MISC DIST PLNT	DNEX	Distribution O&M Expense	SNPD	2,165	77	573	138	208	1,064	115	-	-
5980000	MNT MISC DIST PLNT	DNEX	Distribution O&M Expense	UT	809	-	-	-	-	809	-	-	-
5980000	MNT MISC DIST PLNT	DNEX	Distribution O&M Expense	WA	209	-	-	209	-	-	-	-	-



Operations & Maintenance Expense (Actuals)  
 S/n of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Group Code	Secondary Group Code Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
5980000	MNT MISC DIST PLNT	DNEX	Distribution O&M Expense	WYP	374	177	323	347	374	582	1,863	302	-
<b>5980000 Total</b>					<b>3,595</b>	<b>(7)</b>	<b>(2)</b>	<b>(0)</b>	<b>(0)</b>	<b>(1)</b>	<b>(3)</b>	<b>(0)</b>	<b>-</b>
5989500	MNT DIST PLNT-ENV AM	DNEX	Distribution O&M Expense	SNPD	(7)	(0)	(2)	(2)	(0)	(1)	(3)	(0)	-
5989500	MNT DIST PLNT-ENV AM	DNEX	Distribution O&M Expense	SNPD	(7)	(0)	(2)	(2)	(0)	(1)	(3)	(0)	-
<b>5989500 Total</b>					<b>2,402</b>	<b>85</b>	<b>636</b>	<b>154</b>	<b>231</b>	<b>1,169</b>	<b>128</b>	<b>-</b>	<b>-</b>
9010000	SUPRV (CUST ACCT)	CAEX	Customer Accounting Expense	WYP	2,388	85	632	153	229	1,163	127	-	-
9010000	SUPRV (CUST ACCT)	CAEX	Customer Accounting Expense	WYP	2,257	53	699	154	164	1,090	96	-	-
<b>9010000 Total</b>					<b>2,257</b>	<b>53</b>	<b>699</b>	<b>154</b>	<b>165</b>	<b>1,090</b>	<b>96</b>	<b>-</b>	<b>-</b>
9020000	METER READING EXP	CAEX	Customer Accounting Expense	CA	408	408	-	-	-	-	-	-	-
9020000	METER READING EXP	CAEX	Customer Accounting Expense	CA	389	9	120	27	28	188	16	-	-
9020000	METER READING EXP	CAEX	Customer Accounting Expense	IDU	2,035	-	-	-	-	-	2,035	-	-
9020000	METER READING EXP	CAEX	Customer Accounting Expense	OR	2,312	-	2,312	-	-	-	-	-	-
9020000	METER READING EXP	CAEX	Customer Accounting Expense	UT	5,735	-	-	-	-	5,735	-	-	-
9020000	METER READING EXP	CAEX	Customer Accounting Expense	WA	1,197	-	-	1,197	-	-	-	-	-
9020000	METER READING EXP	CAEX	Customer Accounting Expense	WYP	1,007	-	-	-	1,007	-	-	-	-
9020000	METER READING EXP	CAEX	Customer Accounting Expense	WYU	189	-	-	-	189	-	-	-	-
<b>9020000 Total</b>					<b>13,271</b>	<b>417</b>	<b>2,432</b>	<b>1,224</b>	<b>1,224</b>	<b>5,923</b>	<b>2,051</b>	<b>-</b>	<b>-</b>
9030000	CUST RCRD/COLL EXP	CAEX	Customer Accounting Expense	CN	1,295	30	401	89	94	625	55	-	-
9030000	CUST RCRD/COLL EXP	CAEX	Customer Accounting Expense	CN	1,295	30	401	89	94	625	55	-	-
<b>9030000 Total</b>					<b>2,546</b>	<b>60</b>	<b>789</b>	<b>174</b>	<b>185</b>	<b>1,229</b>	<b>108</b>	<b>-</b>	<b>-</b>
9032000	CUST ACCTG/BILL	CAEX	Customer Accounting Expense	CN	8,631	202	2,675	591	628	4,169	366	-	-
9032000	CUST ACCTG/BILL	CAEX	Customer Accounting Expense	OR	0	-	0	-	-	-	-	-	-
9032000	CUST ACCTG/BILL	CAEX	Customer Accounting Expense	UT	(4)	-	-	-	-	-	(4)	-	-
9032000	CUST ACCTG/BILL	CAEX	Customer Accounting Expense	WA	0	-	-	-	0	-	-	-	-
<b>9032000 Total</b>					<b>8,627</b>	<b>202</b>	<b>2,675</b>	<b>591</b>	<b>628</b>	<b>4,164</b>	<b>366</b>	<b>-</b>	<b>-</b>
9033000	CUST ACCTG/COLL	CAEX	Customer Accounting Expense	CA	17	17	-	-	-	-	-	-	-
9033000	CUST ACCTG/COLL	CAEX	Customer Accounting Expense	CN	13,185	309	4,086	902	960	6,388	559	-	-
9033000	CUST ACCTG/COLL	CAEX	Customer Accounting Expense	IDU	300	-	-	-	-	-	300	-	-
9033000	CUST ACCTG/COLL	CAEX	Customer Accounting Expense	OR	672	-	672	-	-	-	-	-	-
9033000	CUST ACCTG/COLL	CAEX	Customer Accounting Expense	UT	1,425	-	-	-	-	1,425	-	-	-
9033000	CUST ACCTG/COLL	CAEX	Customer Accounting Expense	WA	188	-	-	188	-	-	-	-	-
9033000	CUST ACCTG/COLL	CAEX	Customer Accounting Expense	WYP	446	-	-	-	446	-	-	-	-
9033000	CUST ACCTG/COLL	CAEX	Customer Accounting Expense	WYU	63	-	-	-	63	-	-	-	-
<b>9033000 Total</b>					<b>16,297</b>	<b>328</b>	<b>4,758</b>	<b>1,091</b>	<b>1,469</b>	<b>7,793</b>	<b>860</b>	<b>-</b>	<b>-</b>
9035000	CUST ACCTG/REQ	CAEX	Customer Accounting Expense	CA	8	8	-	-	-	-	-	-	-
9035000	CUST ACCTG/REQ	CAEX	Customer Accounting Expense	IDU	16	-	-	-	-	-	16	-	-
9035000	CUST ACCTG/REQ	CAEX	Customer Accounting Expense	OR	79	-	79	-	-	-	-	-	-
9035000	CUST ACCTG/REQ	CAEX	Customer Accounting Expense	UT	58	-	-	-	-	58	-	-	-
9035000	CUST ACCTG/REQ	CAEX	Customer Accounting Expense	WA	12	-	-	12	-	-	-	-	-
9035000	CUST ACCTG/REQ	CAEX	Customer Accounting Expense	WYP	16	-	-	-	16	-	-	-	-
9035000	CUST ACCTG/REQ	CAEX	Customer Accounting Expense	WYU	8	-	-	-	8	-	-	-	-
<b>9035000 Total</b>					<b>197</b>	<b>8</b>	<b>79</b>	<b>12</b>	<b>12</b>	<b>24</b>	<b>58</b>	<b>16</b>	<b>-</b>
9036000	CUST ACCTG/COMMON	CAEX	Customer Accounting Expense	CN	13,573	318	4,206	929	988	6,555	576	-	-
9036000	CUST ACCTG/COMMON	CAEX	Customer Accounting Expense	OR	14	-	14	-	-	-	-	-	-
9036000	CUST ACCTG/COMMON	CAEX	Customer Accounting Expense	WA	51	-	-	51	-	-	-	-	-
<b>9036000 Total</b>					<b>13,637</b>	<b>318</b>	<b>4,220</b>	<b>979</b>	<b>988</b>	<b>6,555</b>	<b>576</b>	<b>-</b>	<b>-</b>
9040000	UNCOLLECT ACCOUNTS	CAEX	Customer Accounting Expense	CA	239	239	-	-	-	-	-	-	-
9040000	UNCOLLECT ACCOUNTS	CAEX	Customer Accounting Expense	CN	141	3	44	10	10	68	6	-	-
9040000	UNCOLLECT ACCOUNTS	CAEX	Customer Accounting Expense	IDU	629	-	-	-	-	-	629	-	-
9040000	UNCOLLECT ACCOUNTS	CAEX	Customer Accounting Expense	OR	5,875	-	5,875	-	-	-	-	-	-
9040000	UNCOLLECT ACCOUNTS	CAEX	Customer Accounting Expense	UT	3,321	-	-	-	-	3,321	-	-	-
9040000	UNCOLLECT ACCOUNTS	CAEX	Customer Accounting Expense	WA	1,709	-	-	1,709	-	-	-	-	-
9040000	UNCOLLECT ACCOUNTS	CAEX	Customer Accounting Expense	WYP	72	-	-	-	72	-	-	-	-
<b>9040000 Total</b>					<b>11,966</b>	<b>243</b>	<b>5,918</b>	<b>1,719</b>	<b>82</b>	<b>3,389</b>	<b>635</b>	<b>-</b>	<b>-</b>
9042000	UNCOLL ACCTS-JOINT U	CAEX	Customer Accounting Expense	CA	(2)	(2)	-	-	-	-	-	-	-
9042000	UNCOLL ACCTS-JOINT U	CAEX	Customer Accounting Expense	IDU	0	-	-	-	-	-	0	-	-
9042000	UNCOLL ACCTS-JOINT U	CAEX	Customer Accounting Expense	OR	42	-	42	-	-	-	-	-	-
9042000	UNCOLL ACCTS-JOINT U	CAEX	Customer Accounting Expense	UT	(17)	-	-	-	-	(17)	-	-	-
9042000	UNCOLL ACCTS-JOINT U	CAEX	Customer Accounting Expense	WA	14	-	-	14	-	-	-	-	-
9042000	UNCOLL ACCTS-JOINT U	CAEX	Customer Accounting Expense	WYP	4	-	-	-	4	-	-	-	-
<b>9042000 Total</b>					<b>42</b>	<b>(2)</b>	<b>42</b>	<b>14</b>	<b>4</b>	<b>(17)</b>	<b>0</b>	<b>-</b>	<b>-</b>
9050000	MISC CUST ACCT EXP	CAEX	Customer Accounting Expense	CN	25	1	8	2	2	12	1	-	-
<b>9050000 Total</b>					<b>25</b>	<b>1</b>	<b>8</b>	<b>2</b>	<b>2</b>	<b>12</b>	<b>1</b>	<b>-</b>	<b>-</b>



Operations & Maintenance Expense (Actuals)  
 Six Month Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Group Code	Secondary Group Code Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
9070000	SUPRV (CUST SERV)	CSEX	Customer Service Expense	CN	3	0	1	1	0	0	1	0	-
<b>9070000 Total</b>					<b>3</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>-</b>
9080000	CUST ASSIST EXP	CSEX	Customer Service Expense	CN	5	0	0	0	0	0	0	0	-
9080000	CUST ASSIST EXP	CSEX	Customer Service Expense	OR	1	-	1	-	-	-	2	-	-
9080000	CUST ASSIST EXP	CSEX	Customer Service Expense	UT	3	-	-	-	-	-	3	-	-
9080000	CUST ASSIST EXP	CSEX	Customer Service Expense	WA	3	-	-	-	-	-	-	-	-
9080000	CUST ASSIST EXP	CSEX	Customer Service Expense	WYP	1	-	-	-	-	-	-	-	-
<b>9080000 Total</b>					<b>13</b>	<b>0</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>1</b>	<b>5</b>	<b>0</b>	<b>-</b>
9081000	CUST ASST EXP-GENL	CSEX	Customer Service Expense	CN	855	20	265	59	62	413	36	-	-
9081000	CUST ASST EXP-GENL	CSEX	Customer Service Expense	OR	1,260	-	1,260	-	-	-	-	-	-
9081000	CUST ASST EXP-GENL	CSEX	Customer Service Expense	OTHER	270	-	-	-	-	-	-	-	270
<b>9081000 Total</b>					<b>2,386</b>	<b>20</b>	<b>1,525</b>	<b>59</b>	<b>62</b>	<b>413</b>	<b>36</b>	<b>-</b>	<b>270</b>
9084000	DSM DIRECT	CSEX	Customer Service Expense	CA	8	-	-	-	-	-	-	-	-
9084000	DSM DIRECT	CSEX	Customer Service Expense	CN	1,063	25	336	74	79	523	46	-	-
9084000	DSM DIRECT	CSEX	Customer Service Expense	IDJ	17	-	-	-	-	-	17	-	-
9084000	DSM DIRECT	CSEX	Customer Service Expense	OTHER	51	-	-	-	-	-	-	-	51
9084000	DSM DIRECT	CSEX	Customer Service Expense	WA	10	-	-	10	-	-	-	-	-
<b>9084000 Total</b>					<b>1,169</b>	<b>33</b>	<b>336</b>	<b>84</b>	<b>79</b>	<b>523</b>	<b>62</b>	<b>-</b>	<b>51</b>
9085100	DSM AMORT-SBC/ECC	CSEX	Customer Service Expense	OTHER	80,711	-	-	-	-	-	-	-	80,711
<b>9085100 Total</b>					<b>80,711</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>80,711</b>
9086000	CUST SERV	CSEX	Customer Service Expense	CN	76	2	24	5	6	37	3	-	-
9086000	CUST SERV	CSEX	Customer Service Expense	IDJ	19	-	-	-	-	-	19	-	-
9086000	CUST SERV	CSEX	Customer Service Expense	OR	2,210	-	2,210	-	-	-	-	-	-
9086000	CUST SERV	CSEX	Customer Service Expense	UT	2,881	-	-	-	-	2,881	-	-	-
9086000	CUST SERV	CSEX	Customer Service Expense	WA	294	-	-	294	-	-	-	-	-
9086000	CUST SERV	CSEX	Customer Service Expense	WYP	951	-	-	-	951	-	-	-	-
<b>9086000 Total</b>					<b>6,431</b>	<b>2</b>	<b>2,234</b>	<b>299</b>	<b>957</b>	<b>2,918</b>	<b>22</b>	<b>-</b>	<b>-</b>
9089300	ENERGY STORAGE	CSEX	Customer Service Expense	OTHER	5	-	-	-	-	-	-	-	5
<b>9089300 Total</b>					<b>5</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>5</b>
9089500	BLUE SKY EXPENSE	CSEX	Customer Service Expense	OTHER	10,046	-	-	-	-	-	-	-	10,046
<b>9089500 Total</b>					<b>10,046</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>10,046</b>
9089600	SOLAR FEED-IN EXP	CSEX	Customer Service Expense	OTHER	10,005	-	-	-	-	-	-	-	10,005
<b>9089600 Total</b>					<b>10,005</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>10,005</b>
9089700	SUBSCRIBER SOLAR	CSEX	Customer Service Expense	UT	161	-	-	-	-	161	-	-	-
<b>9089700 Total</b>					<b>161</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>161</b>	<b>-</b>	<b>-</b>	<b>-</b>
9089800	COMMUNITY SOLAR	CSEX	Customer Service Expense	OTHER	460	-	-	-	-	-	-	-	460
<b>9089800 Total</b>					<b>460</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>460</b>
9090000	INFOR/INSTRCT ADV	CSEX	Customer Service Expense	CA	123	123	-	-	-	-	-	-	-
9090000	INFOR/INSTRCT ADV	CSEX	Customer Service Expense	CN	2,683	63	832	184	195	1,296	114	-	-
9090000	INFOR/INSTRCT ADV	CSEX	Customer Service Expense	IDJ	91	-	-	-	-	-	91	-	-
9090000	INFOR/INSTRCT ADV	CSEX	Customer Service Expense	OR	680	-	680	-	-	-	-	-	-
9090000	INFOR/INSTRCT ADV	CSEX	Customer Service Expense	UT	569	-	-	-	-	569	-	-	-
9090000	INFOR/INSTRCT ADV	CSEX	Customer Service Expense	WA	153	-	-	153	-	-	-	-	-
9090000	INFOR/INSTRCT ADV	CSEX	Customer Service Expense	WYP	340	-	-	-	340	-	-	-	-
<b>9090000 Total</b>					<b>4,638</b>	<b>186</b>	<b>1,511</b>	<b>336</b>	<b>535</b>	<b>1,865</b>	<b>205</b>	<b>-</b>	<b>-</b>
9100000	MISC CUST SERV/INF	CSEX	Customer Service Expense	CN	2	0	1	0	0	1	0	-	-
<b>9100000 Total</b>					<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>-</b>	<b>-</b>
9200000	ADMIN & GEN SALARY	AGEX	Administrative & General Expense	OR	703	-	703	-	-	-	-	-	-
9200000	ADMIN & GEN SALARY	AGEX	Administrative & General Expense	SO	76,468	1,684	20,742	5,859	10,032	33,677	4,458	16	-
9200000	ADMIN & GEN SALARY	AGEX	Administrative & General Expense	UT	1,188	-	-	-	-	1,188	-	-	-
9200000	ADMIN & GEN SALARY	AGEX	Administrative & General Expense	WA	0	-	-	0	-	-	-	-	-
9200000	ADMIN & GEN SALARY	AGEX	Administrative & General Expense	WYP	395	-	-	-	395	-	-	-	-
<b>9200000 Total</b>					<b>78,753</b>	<b>1,684</b>	<b>21,445</b>	<b>5,859</b>	<b>10,426</b>	<b>34,864</b>	<b>4,458</b>	<b>16</b>	<b>-</b>
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	CA	2	2	-	-	-	-	-	-	-
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	CN	87	2	27	6	6	42	4	-	-
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	IDJ	423	-	-	-	-	-	423	-	-
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	OR	1,811	-	1,811	-	-	-	-	-	-
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	SO	8,230	181	2,232	631	1,080	3,625	480	-	2
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	UT	78	-	-	-	-	78	-	-	-
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	WA	8	-	-	8	-	-	-	-	-
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	WYP	19	-	-	-	19	-	-	-	-
9210000	OFFICE SUPPL & EXP	AGEX	Administrative & General Expense	WYU	5	-	-	-	5	-	-	-	-
<b>9210000 Total</b>					<b>10,663</b>	<b>185</b>	<b>4,071</b>	<b>644</b>	<b>1,110</b>	<b>3,745</b>	<b>907</b>	<b>-</b>	<b>2</b>
9220000	A&G EXP TRANSF-CR	AGEX	Administrative & General Expense	SO	(37,447)	(825)	(10,157)	(2,869)	(4,912)	(16,491)	(2,183)	(8)	-
<b>9220000 Total</b>					<b>(37,447)</b>	<b>(825)</b>	<b>(10,157)</b>	<b>(2,869)</b>	<b>(4,912)</b>	<b>(16,491)</b>	<b>(2,183)</b>	<b>(8)</b>	<b>-</b>





Operations & Maintenance Expense (Actuals)  
 S/n of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Group Code	Secondary Group Code Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
9282000	REG COMM EXPENSE	OR	Administrative & General Expense	3,778	3,778	-	-	-	-	-	-	-	-
9282000	REG COMM EXPENSE	UT	Administrative & General Expense	6,221	-	-	-	-	-	6,221	-	-	-
9282000	REG COMM EXPENSE	WA	Administrative & General Expense	674	-	-	674	-	-	-	-	-	-
9282000	REG COMM EXPENSE	WYP	Administrative & General Expense	1,830	-	-	-	1,830	-	-	-	-	-
<b>9282000 Total</b>				<b>13,305</b>	<b>78</b>	<b>3,778</b>	<b>674</b>	<b>1,830</b>	<b>1,830</b>	<b>6,221</b>	<b>723</b>	<b>-</b>	<b>-</b>
9283000	FERC FILING FEE	SG	Administrative & General Expense	4,290	63	1,115	335	607	1,911	257	1	-	-
9283000	FERC FILING FEE	SO	Administrative & General Expense	4,290	63	1,115	335	607	1,911	257	1	-	-
9290000	DUPLICATE CHRGS-CR	SO	Administrative & General Expense	(3,458)	(76)	(938)	(265)	(454)	(854)	(1,523)	(202)	(1)	-
9290000	DUPLICATE CHRGS-CR	SO	Administrative & General Expense	(3,458)	(76)	(938)	(265)	(454)	(854)	(1,523)	(202)	(1)	-
9291000	DUP CHG CR - PENSION	SO	Administrative & General Expense	(8,149)	(179)	(2,210)	(624)	(1,069)	(3,589)	(475)	(2)	-	-
9291000	DUP CHG CR - PENSION	SO	Administrative & General Expense	(8,149)	(179)	(2,210)	(624)	(1,069)	(3,589)	(475)	(2)	-	-
9292000	DUP CHG CR - POST-RT	SO	Administrative & General Expense	(947)	(21)	(257)	(73)	(124)	(417)	(55)	(0)	-	-
9292000	DUP CHG CR - POST-RT	SO	Administrative & General Expense	(947)	(21)	(257)	(73)	(124)	(417)	(55)	(0)	-	-
9294000	DUP CHG CR - MDV/L	SO	Administrative & General Expense	(60,432)	(1,331)	(16,392)	(4,630)	(7,928)	(26,614)	(3,524)	(12)	-	-
9294000	DUP CHG CR - MDV/L	SO	Administrative & General Expense	(60,432)	(1,331)	(16,392)	(4,630)	(7,928)	(26,614)	(3,524)	(12)	-	-
9295000	DUP CHRGS CR - 401(K)	SO	Administrative & General Expense	(39,571)	(872)	(10,734)	(3,032)	(5,191)	(17,427)	(2,307)	(6)	-	-
9295000	DUP CHRGS CR - 401(K)	SO	Administrative & General Expense	(39,571)	(872)	(10,734)	(3,032)	(5,191)	(17,427)	(2,307)	(6)	-	-
9296000	DUP CHG CR - POST-EM	SO	Administrative & General Expense	(6,401)	(141)	(1,736)	(490)	(840)	(2,819)	(373)	(1)	-	-
9296000	DUP CHG CR - POST-EM	SO	Administrative & General Expense	(6,401)	(141)	(1,736)	(490)	(840)	(2,819)	(373)	(1)	-	-
9297000	DUP CHG CR - OTH BEN	SO	Administrative & General Expense	(5,779)	(127)	(1,568)	(443)	(758)	(2,545)	(337)	(1)	-	-
9297000	DUP CHG CR - OTH BEN	SO	Administrative & General Expense	(5,779)	(127)	(1,568)	(443)	(758)	(2,545)	(337)	(1)	-	-
9301000	GEN ADVERTISING EXP	SO	Administrative & General Expense	18	0	5	1	2	8	1	0	-	-
9301000	GEN ADVERTISING EXP	SO	Administrative & General Expense	18	0	5	1	2	8	1	0	-	-
9302000	MISC GEN EXP-OTHER	OR	Administrative & General Expense	2,228	49	604	171	292	981	130	0	-	-
9302000	MISC GEN EXP-OTHER	SO	Administrative & General Expense	2,228	49	604	171	292	981	130	0	-	-
9302000	MISC GEN EXP-OTHER	UT	Administrative & General Expense	3	-	-	-	-	-	3	-	-	-
9302000	MISC GEN EXP-OTHER	WYP	Administrative & General Expense	19	-	-	-	-	19	-	-	-	-
9302000	MISC GEN EXP-OTHER	WYP	Administrative & General Expense	19	-	-	-	-	19	-	-	-	-
<b>9302000 Total</b>				<b>2,250</b>	<b>49</b>	<b>605</b>	<b>171</b>	<b>311</b>	<b>311</b>	<b>984</b>	<b>130</b>	<b>0</b>	<b>-</b>
9310000	RENTS (A&G)	CA	Administrative & General Expense	51	51	-	-	-	-	-	-	-	-
9310000	RENTS (A&G)	IDU	Administrative & General Expense	1	-	-	-	-	-	-	1	-	-
9310000	RENTS (A&G)	OR	Administrative & General Expense	455	-	-	-	-	-	-	-	-	-
9310000	RENTS (A&G)	SO	Administrative & General Expense	2,061	45	559	158	270	908	120	0	-	-
9310000	RENTS (A&G)	UT	Administrative & General Expense	369	-	-	-	-	-	369	-	-	-
9310000	RENTS (A&G)	WA	Administrative & General Expense	10	-	-	-	-	-	-	-	-	-
9310000	RENTS (A&G)	WYP	Administrative & General Expense	146	-	-	-	-	146	-	-	-	-
9310000	RENTS (A&G)	WYP	Administrative & General Expense	146	-	-	-	-	146	-	-	-	-
<b>9310000 Total</b>				<b>3,093</b>	<b>96</b>	<b>1,014</b>	<b>168</b>	<b>416</b>	<b>1,277</b>	<b>121</b>	<b>0</b>	<b>-</b>	<b>-</b>
9350000	MAINT GENERAL PLNT	CA	Administrative & General Expense	117	117	-	-	-	-	-	-	-	-
9350000	MAINT GENERAL PLNT	CN	Administrative & General Expense	28	1	9	2	2	13	-	-	-	-
9350000	MAINT GENERAL PLNT	IDU	Administrative & General Expense	6	-	-	-	-	-	-	6	-	-
9350000	MAINT GENERAL PLNT	OR	Administrative & General Expense	150	-	-	-	-	-	-	-	-	-
9350000	MAINT GENERAL PLNT	SO	Administrative & General Expense	26,097	575	7,079	2,000	3,424	11,493	1,522	5	-	-
9350000	MAINT GENERAL PLNT	UT	Administrative & General Expense	33	-	-	-	-	-	33	-	-	-
9350000	MAINT GENERAL PLNT	WA	Administrative & General Expense	74	-	-	-	-	74	-	-	-	-
9350000	MAINT GENERAL PLNT	WYP	Administrative & General Expense	10	-	-	-	-	10	-	-	-	-
9350000	MAINT GENERAL PLNT	WYP	Administrative & General Expense	10	-	-	-	-	10	-	-	-	-
9350000	MAINT GENERAL PLNT	WYU	Administrative & General Expense	3	-	-	-	-	3	-	-	-	-
9350000	MAINT GENERAL PLNT	WYU	Administrative & General Expense	3	-	-	-	-	3	-	-	-	-
<b>9350000 Total</b>				<b>26,517</b>	<b>693</b>	<b>7,237</b>	<b>2,075</b>	<b>3,439</b>	<b>11,539</b>	<b>1,529</b>	<b>5</b>	<b>-</b>	<b>-</b>
9359500	MAINT GEN PLT-ENV AM	SO	Administrative & General Expense	22	0	6	2	3	10	1	0	-	-
9359500	MAINT GEN PLT-ENV AM	SO	Administrative & General Expense	22	0	6	2	3	10	1	0	-	-
<b>Grand Total</b>				<b>3,092,164</b>	<b>57,029</b>	<b>811,824</b>	<b>220,145</b>	<b>407,936</b>	<b>1,309,114</b>	<b>180,687</b>	<b>788</b>	<b>105,540</b>	<b>-</b>

# **B3. DEPRECIATION EXPENSE**





Depreciation Expense (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Account	Secondary Account Name	Alicc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4030000	DEPN EXPENSE-ELECT	3602000	LAND RIGHTS	WYU	60	-	-	-	-	60	-	-	-
4030000	DEPN EXPENSE-ELECT	3602000	LAND RIGHTS	WYU	76	-	-	-	-	76	-	-	-
4030000	DEPN EXPENSE-ELECT	3610000	STRUCTURES & IMPROVEMENTS	CA	98	-	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3610000	STRUCTURES & IMPROVEMENTS	IDU	54	-	-	-	-	-	-	-	54
4030000	DEPN EXPENSE-ELECT	3610000	STRUCTURES & IMPROVEMENTS	OR	545	-	545	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3610000	STRUCTURES & IMPROVEMENTS	UT	1,059	-	-	-	-	1,059	-	-	-
4030000	DEPN EXPENSE-ELECT	3610000	STRUCTURES & IMPROVEMENTS	WA	106	-	-	106	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3610000	STRUCTURES & IMPROVEMENTS	WYP	212	-	-	-	212	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3610000	STRUCTURES & IMPROVEMENTS	WYU	84	-	-	-	84	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3620000	STATION EQUIPMENT	CA	739	739	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3620000	STATION EQUIPMENT	IDU	739	-	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3620000	STATION EQUIPMENT	OR	5,098	-	5,098	-	-	-	-	-	739
4030000	DEPN EXPENSE-ELECT	3620000	STATION EQUIPMENT	UT	11,229	-	-	-	-	11,229	-	-	-
4030000	DEPN EXPENSE-ELECT	3620000	STATION EQUIPMENT	WA	1,674	-	-	1,674	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3620000	STATION EQUIPMENT	WYP	2,269	-	-	-	2,269	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3620000	STATION EQUIPMENT	WYU	353	-	-	-	353	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3627000	STATION EQUIPMENT-SUPERVISORY & ALARM	CA	10	10	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3627000	STATION EQUIPMENT-SUPERVISORY & ALARM	IDU	11	-	-	-	-	-	-	-	11
4030000	DEPN EXPENSE-ELECT	3627000	STATION EQUIPMENT-SUPERVISORY & ALARM	OR	82	-	82	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3627000	STATION EQUIPMENT-SUPERVISORY & ALARM	UT	167	-	-	-	-	167	-	-	-
4030000	DEPN EXPENSE-ELECT	3627000	STATION EQUIPMENT-SUPERVISORY & ALARM	WA	28	-	-	28	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3627000	STATION EQUIPMENT-SUPERVISORY & ALARM	WYP	37	-	-	-	37	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3640000	"POLES, TOWERS AND FIXTURES"	CA	4	4	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3640000	"POLES, TOWERS AND FIXTURES"	IDU	2,724	2,724	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3640000	"POLES, TOWERS AND FIXTURES"	OR	3,466	-	13,886	-	-	-	-	-	3,466
4030000	DEPN EXPENSE-ELECT	3640000	"POLES, TOWERS AND FIXTURES"	UT	15,230	-	-	-	-	15,230	-	-	-
4030000	DEPN EXPENSE-ELECT	3640000	"POLES, TOWERS AND FIXTURES"	WA	4,075	-	-	4,075	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3640000	"POLES, TOWERS AND FIXTURES"	WYP	5,360	-	-	-	5,360	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3640000	"POLES, TOWERS AND FIXTURES"	WYU	1,073	-	-	-	1,073	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3650000	OVERHEAD CONDUCTORS & DEVICES	CA	913	913	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3650000	OVERHEAD CONDUCTORS & DEVICES	IDU	1,000	-	-	-	-	-	-	-	1,000
4030000	DEPN EXPENSE-ELECT	3650000	OVERHEAD CONDUCTORS & DEVICES	OR	6,876	-	6,876	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3650000	OVERHEAD CONDUCTORS & DEVICES	UT	6,989	-	-	-	-	6,989	-	-	-
4030000	DEPN EXPENSE-ELECT	3650000	OVERHEAD CONDUCTORS & DEVICES	WA	1,982	-	-	1,982	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3650000	OVERHEAD CONDUCTORS & DEVICES	WYP	2,673	-	-	-	2,673	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3650000	OVERHEAD CONDUCTORS & DEVICES	WYU	350	-	-	-	350	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3660000	UNDERGROUND CONDUIT	CA	460	460	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3660000	UNDERGROUND CONDUIT	IDU	288	-	-	-	-	-	-	-	288
4030000	DEPN EXPENSE-ELECT	3660000	UNDERGROUND CONDUIT	OR	1,945	-	1,945	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3660000	UNDERGROUND CONDUIT	UT	5,519	-	-	-	-	5,519	-	-	-
4030000	DEPN EXPENSE-ELECT	3660000	UNDERGROUND CONDUIT	WA	513	-	-	513	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3660000	UNDERGROUND CONDUIT	WYP	837	-	-	-	837	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3660000	UNDERGROUND CONDUIT	WYU	158	-	-	-	158	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3670000	UNDERGROUND CONDUCTORS & DEVICES	CA	533	533	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3670000	UNDERGROUND CONDUCTORS & DEVICES	IDU	634	-	-	-	-	-	-	-	634
4030000	DEPN EXPENSE-ELECT	3670000	UNDERGROUND CONDUCTORS & DEVICES	OR	4,184	-	4,184	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3670000	UNDERGROUND CONDUCTORS & DEVICES	UT	13,443	-	-	-	-	13,443	-	-	-
4030000	DEPN EXPENSE-ELECT	3670000	UNDERGROUND CONDUCTORS & DEVICES	WA	741	-	-	741	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3670000	UNDERGROUND CONDUCTORS & DEVICES	WYP	1,443	-	-	-	1,443	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3670000	UNDERGROUND CONDUCTORS & DEVICES	WYU	553	-	-	-	553	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3680000	LINE TRANSFORMERS	CA	1,290	1,290	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3680000	LINE TRANSFORMERS	IDU	1,969	-	-	-	-	-	-	-	1,969
4030000	DEPN EXPENSE-ELECT	3680000	LINE TRANSFORMERS	OR	11,544	-	11,544	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3680000	LINE TRANSFORMERS	UT	13,914	-	-	-	-	13,914	-	-	-
4030000	DEPN EXPENSE-ELECT	3680000	LINE TRANSFORMERS	WA	3,017	-	-	-	3,017	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3680000	LINE TRANSFORMERS	WYP	3,489	-	-	-	3,489	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3680000	LINE TRANSFORMERS	WYU	489	-	-	-	489	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3691000	SERVICES - OVERHEAD	CA	252	252	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3691000	SERVICES - OVERHEAD	IDU	214	-	-	-	-	-	-	-	214
4030000	DEPN EXPENSE-ELECT	3691000	SERVICES - OVERHEAD	OR	2,222	-	2,222	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3691000	SERVICES - OVERHEAD	UT	2,240	-	-	-	-	2,240	-	-	-
4030000	DEPN EXPENSE-ELECT	3691000	SERVICES - OVERHEAD	WA	564	-	-	564	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3691000	SERVICES - OVERHEAD	WYP	397	-	-	-	397	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3691000	SERVICES - OVERHEAD	WYU	87	-	-	-	87	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3692000	SERVICES - UNDERGROUND	CA	388	388	-	-	-	-	-	-	-





Depreciation Expense (Actuals)  
 S/n of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Account	Secondary Account Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4030000	DEPN EXPENSE-ELECT	3692000	SERVICES - UNDERGROUND	IDU	851	-	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3692000	SERVICES - UNDERGROUND	OR	4,746	4,746	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3692000	SERVICES - UNDERGROUND	UT	6,191	-	-	-	-	6,191	-	-	-
4030000	DEPN EXPENSE-ELECT	3692000	SERVICES - UNDERGROUND	WA	1,165	-	1,165	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3692000	SERVICES - UNDERGROUND	WYU	1,052	-	-	-	1,052	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3692000	SERVICES - UNDERGROUND	WYU	366	-	-	-	-	366	-	-	-
4030000	DEPN EXPENSE-ELECT	3700000	METERS	CA	294	294	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3700000	METERS	IDU	721	-	-	-	-	-	721	-	-
4030000	DEPN EXPENSE-ELECT	3700000	METERS	OR	2,574	2,574	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3700000	METERS	UT	4,768	-	-	-	-	4,768	-	-	-
4030000	DEPN EXPENSE-ELECT	3700000	METERS	WA	639	-	-	639	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3700000	METERS	WYU	655	-	-	-	655	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3700000	METERS	WYU	121	-	-	-	-	121	-	-	-
4030000	DEPN EXPENSE-ELECT	3710000	INSTALL ON CUSTOMERS PREMISES	CA	15	15	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3710000	INSTALL ON CUSTOMERS PREMISES	IDU	9	9	-	-	-	-	9	-	-
4030000	DEPN EXPENSE-ELECT	3710000	INSTALL ON CUSTOMERS PREMISES	OR	122	122	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3710000	INSTALL ON CUSTOMERS PREMISES	UT	267	-	-	-	-	267	-	-	-
4030000	DEPN EXPENSE-ELECT	3710000	INSTALL ON CUSTOMERS PREMISES	WA	19	-	-	19	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3710000	INSTALL ON CUSTOMERS PREMISES	WYU	40	-	-	-	40	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3710000	INSTALL ON CUSTOMERS PREMISES	WYU	8	-	-	-	8	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3730000	STREET LIGHTING & SIGNAL SYSTEMS	CA	28	28	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3730000	STREET LIGHTING & SIGNAL SYSTEMS	IDU	36	-	-	-	-	-	36	-	-
4030000	DEPN EXPENSE-ELECT	3730000	STREET LIGHTING & SIGNAL SYSTEMS	OR	664	664	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3730000	STREET LIGHTING & SIGNAL SYSTEMS	UT	1,106	-	-	-	-	1,106	-	-	-
4030000	DEPN EXPENSE-ELECT	3730000	STREET LIGHTING & SIGNAL SYSTEMS	WA	110	-	-	110	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3730000	STREET LIGHTING & SIGNAL SYSTEMS	WYU	241	-	-	-	241	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3730000	STREET LIGHTING & SIGNAL SYSTEMS	WYU	64	-	-	-	-	64	-	-	-
4030000	DEPN EXPENSE-ELECT	3892000	LAND RIGHTS	IDU	0	-	-	-	-	-	-	0	-
4030000	DEPN EXPENSE-ELECT	3892000	LAND RIGHTS	OR	0	-	0	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3892000	LAND RIGHTS	SG	0	0	0	0	0	0	0	0	0
4030000	DEPN EXPENSE-ELECT	3892000	LAND RIGHTS	SO	2	0	1	0	0	1	0	0	0
4030000	DEPN EXPENSE-ELECT	3892000	LAND RIGHTS	UT	2	-	-	-	-	-	2	-	-
4030000	DEPN EXPENSE-ELECT	3892000	LAND RIGHTS	WYU	1	-	-	-	-	1	-	-	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	CA	69	69	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	ON	167	4	52	11	12	81	7	-	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	IDU	201	-	-	-	-	-	201	-	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	OR	684	-	684	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	SE	18	4	-	1	3	8	1	0	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	SG	205	3	53	16	29	91	12	0	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	SO	1,942	43	527	149	255	855	113	0	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	UT	941	-	-	-	-	941	-	-	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	WA	265	-	-	265	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	WYU	213	-	-	-	213	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3900000	STRUCTURES AND IMPROVEMENTS	WYU	103	-	-	-	103	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	CA	5	5	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	ON	42	1	13	3	3	20	2	-	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	IDU	5	-	-	-	-	-	5	-	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	OR	74	-	74	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	SE	0	0	0	0	0	0	0	0	0
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	SG	79	1	21	6	0	35	5	0	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	SO	575	13	156	44	75	253	34	0	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	UT	42	-	-	-	42	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	WA	4	-	-	4	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	WYU	26	-	-	-	26	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3910000	OFFICE FURNITURE	WYU	2	-	-	-	2	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	CA	7	7	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	ON	588	14	182	40	43	284	25	-	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	IDU	78	-	-	-	-	-	78	-	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	OR	181	-	181	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	SE	5	0	0	0	0	2	0	0	0
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	SG	479	1	125	37	68	213	29	0	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	SO	9,187	202	2,482	704	1,205	4,046	536	2	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	UT	144	-	-	-	-	144	-	-	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	WA	63	-	-	63	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	WYU	341	-	-	-	341	-	-	-	-



Depreciation Expense (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Account	Secondary Account Name	Alicc	Total	Califf	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4030000	DEPN EXPENSE-ELECT	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	WYU	13	-	-	-	-	13	-	-	-
4030000	DEPN EXPENSE-ELECT	3913000	OFFICE EQUIPMENT	CN	0	0	0	0	0	0	0	0	-
4030000	DEPN EXPENSE-ELECT	3913000	OFFICE EQUIPMENT	IDU	0	-	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3913000	OFFICE EQUIPMENT	OR	0	-	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3913000	OFFICE EQUIPMENT	SG	6	0	0	2	0	1	3	0	0
4030000	DEPN EXPENSE-ELECT	3913000	OFFICE EQUIPMENT	SO	15	0	0	4	1	2	7	1	0
4030000	DEPN EXPENSE-ELECT	3913000	OFFICE EQUIPMENT	UT	1	-	-	-	-	-	1	-	-
4030000	DEPN EXPENSE-ELECT	3913000	OFFICE EQUIPMENT	WYP	0	-	-	-	-	0	-	-	-
4030000	DEPN EXPENSE-ELECT	3913000	OFFICE EQUIPMENT	WYU	1	-	-	-	-	1	-	-	-
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	CA	7	-	7	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	IDU	23	-	-	-	-	-	-	23	-
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	OR	107	-	107	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	SG	237	3	62	19	34	105	14	0	0
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	SO	10	0	3	1	1	4	1	0	-
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	UT	140	-	-	-	-	140	-	-	-
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	WA	27	-	-	27	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	WYP	50	-	-	-	50	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3930000	STORES EQUIPMENT	WYU	0	-	-	-	0	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	CA	33	-	33	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	IDU	90	-	-	-	-	-	-	90	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	OR	450	-	450	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	SE	4	0	0	1	0	2	0	0	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	SG	925	14	240	72	131	412	55	0	0
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	SO	82	2	22	6	11	36	5	0	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	UT	631	-	-	-	-	631	-	-	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	WA	109	-	-	109	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	WYP	160	-	-	-	160	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3940000	TLS SHOP GAR EQUIPMENT	WYU	16	-	-	-	16	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	CA	21	21	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	IDU	65	-	-	-	-	-	-	65	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	OR	465	-	465	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	SE	61	1	15	4	9	27	4	0	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	SG	321	5	83	25	143	19	0	0	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	SO	243	5	66	19	32	107	14	0	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	UT	387	-	-	-	-	387	-	-	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	WA	73	-	-	73	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	WYP	133	-	-	-	133	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3950000	LABORATORY EQUIPMENT	WYU	5	-	-	-	5	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	CA	257	257	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	CN	165	4	51	11	12	80	7	-	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	IDU	495	-	-	-	-	-	495	-	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	OR	3,306	-	3,306	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	SE	12	0	3	1	2	5	1	0	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	SG	7,728	113	2,009	604	1,094	3,442	463	2	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	SO	4,099	90	1,112	314	538	1,805	239	1	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	UT	2,637	-	-	-	-	2,637	-	-	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	WA	506	-	-	-	506	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	WYP	997	-	-	-	997	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3970000	COMMUNICATION EQUIPMENT	WYU	254	-	-	-	254	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	CA	27	27	-	-	-	-	-	27	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	IDU	27	-	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	OR	219	-	219	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	SE	7	0	2	1	1	3	0	0	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	SG	357	5	93	28	51	159	21	0	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	SO	44	1	12	3	6	20	3	0	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	UT	169	-	-	-	-	169	-	-	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	WA	44	-	-	44	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	WYP	54	-	-	-	54	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3972000	MOBILE RADIO EQUIPMENT	WYU	9	-	-	-	9	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	CA	3	3	-	-	-	-	2	0	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	CN	4	0	1	0	0	-	-	4	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	IDU	4	-	-	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	OR	61	-	61	-	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	SG	0	0	0	0	0	0	0	0	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	SO	141	2	37	11	141	20	63	8	0
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	UT	110	2	30	8	8	14	48	6	0



Depreciation Expense (Actuals)  
 Sum of Range: 07/2020 - 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Account	Secondary Account Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	UT	69	69	-	-	-	-	69	-	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	WA	9	9	-	9	-	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	WYP	12	12	-	-	12	-	-	-	-
4030000	DEPN EXPENSE-ELECT	3980000	MISCELLANEOUS EQUIPMENT	WYU	1	1	-	-	1	-	-	-	-
<b>4030000 Total</b>					<b>839,912</b>	<b>17,570</b>	<b>224,786</b>	<b>65,157</b>	<b>114,231</b>	<b>369,160</b>	<b>48,826</b>	<b>183</b>	-
4032000	DEPR - STEAM	565131	DEPR - PROD STEAM NOT CLASSIFIED	SG	9,065	133	2,357	709	1,283	4,038	543	3	-
4032000	DEPR - STEAM	565247	Depr - Prod Steam UT STEP	OTHER	180,756	-	-	-	-	-	-	-	180,756
<b>4032000 Total</b>					<b>189,821</b>	<b>133</b>	<b>2,357</b>	<b>709</b>	<b>1,283</b>	<b>4,038</b>	<b>543</b>	<b>3</b>	<b>180,756</b>
4033000	DEPR - HYDRO	565133	DEPR - PROD HYDRO NOT CLASSIFIED	SG-P	872	13	227	68	123	388	52	0	-
4033000	DEPR - HYDRO	565133	DEPR - PROD HYDRO NOT CLASSIFIED	SG-U	1	1	21	6	12	37	5	0	-
<b>4033000 Total</b>					<b>873</b>	<b>14</b>	<b>248</b>	<b>75</b>	<b>135</b>	<b>425</b>	<b>57</b>	<b>0</b>	<b>-</b>
4034000	DEPR - OTHER	565134	DEPR - PROD OTHER NOT CLASSIFIED	SG	249	4	65	19	35	111	15	0	-
<b>4034000 Total</b>					<b>249</b>	<b>4</b>	<b>65</b>	<b>19</b>	<b>35</b>	<b>111</b>	<b>15</b>	<b>0</b>	<b>-</b>
4035000	DEPR-TRANSMISSION	565141	DEPR - TRANS ASSETS NOT CLASSIFIED	SG	10,800	158	2,808	844	1,529	4,811	647	3	-
<b>4035000 Total</b>					<b>10,800</b>	<b>158</b>	<b>2,808</b>	<b>844</b>	<b>1,529</b>	<b>4,811</b>	<b>647</b>	<b>3</b>	<b>-</b>
4036000	DEPR-DISTRIBUTION	565161	DEPR - DIST ASSETS NOT CLASSIFIED	CA	101	101	-	-	-	-	-	-	-
4036000	DEPR-DISTRIBUTION	565161	DEPR - DIST ASSETS NOT CLASSIFIED	IDU	(1,045)	-	-	-	-	-	(1,045)	-	-
4036000	DEPR-DISTRIBUTION	565161	DEPR - DIST ASSETS NOT CLASSIFIED	OR	974	-	974	-	-	-	-	-	-
4036000	DEPR-DISTRIBUTION	565161	DEPR - DIST ASSETS NOT CLASSIFIED	UT	(10,026)	-	-	-	-	(10,026)	-	-	-
4036000	DEPR-DISTRIBUTION	565161	DEPR - DIST ASSETS NOT CLASSIFIED	WA	544	-	-	544	-	-	-	-	-
4036000	DEPR-DISTRIBUTION	565161	DEPR - DIST ASSETS NOT CLASSIFIED	WYP	(647)	-	-	-	(647)	-	-	-	-
<b>4036000 Total</b>					<b>(10,099)</b>	<b>101</b>	<b>974</b>	<b>544</b>	<b>(647)</b>	<b>(10,026)</b>	<b>(1,045)</b>	<b>-</b>	<b>-</b>
4037000	DEPR - GENERAL	565201	DEPR - GEN ASSETS NOT CLASSIFIED	SG	3,666	54	953	287	519	1,633	220	1	-
<b>4037000 Total</b>					<b>3,666</b>	<b>54</b>	<b>953</b>	<b>287</b>	<b>519</b>	<b>1,633</b>	<b>220</b>	<b>1</b>	<b>-</b>
4039999	DEPR EXP-ELEC, OTH	565970	DEPRECIATION-JOINT OWNER BILLED-CREDIT	SG	(222)	(3)	(58)	(17)	(31)	(99)	(13)	(0)	-
<b>4039999 Total</b>					<b>(222)</b>	<b>(3)</b>	<b>(58)</b>	<b>(17)</b>	<b>(31)</b>	<b>(99)</b>	<b>(13)</b>	<b>(0)</b>	<b>-</b>
<b>Grand Total</b>					<b>1,035,081</b>	<b>18,030</b>	<b>232,134</b>	<b>67,617</b>	<b>117,053</b>	<b>370,052</b>	<b>49,249</b>	<b>190</b>	<b>180,756</b>

# **B4. AMORTIZATION EXPENSE**



**Amortization Expense (Actuals)**

Sum of Range: 07/2020 - 06/2021

Allocation Method - Factor 2020 Protocol

(Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Account	Secondary Account Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4040000	AMOR LTD TRM PLNT	3020000	FRANCHISES AND CONSENTS	IDU	20	-	-	-	-	-	20	-	-
4040000	AMOR LTD TRM PLNT	3020000	FRANCHISES AND CONSENTS	SG	631	9	164	49	89	281	38	0	-
4040000	AMOR LTD TRM PLNT	3020000	FRANCHISES AND CONSENTS	SG-P	2,680	39	697	210	379	1,194	161	1	-
4040000	AMOR LTD TRM PLNT	3020000	FRANCHISES AND CONSENTS	SG-U	306	4	80	24	43	136	18	0	-
4040000	AMOR LTD TRM PLNT	3031040	INTANGIBLE PLANT	OR	9	-	9	-	-	-	-	-	-
4040000	AMOR LTD TRM PLNT	3031040	INTANGIBLE PLANT	SG	996	15	259	78	141	444	60	0	-
4040000	AMOR LTD TRM PLNT	3031040	INTANGIBLE PLANT	UT	34	-	-	-	-	34	-	-	-
4040000	AMOR LTD TRM PLNT	3031040	INTANGIBLE PLANT	WYP	59	-	-	-	59	-	-	-	-
4040000	AMOR LTD TRM PLNT	3031050	RWT - RCMS WORK TRACKING	SO	58	1	16	4	8	26	3	0	-
4040000	AMOR LTD TRM PLNT	3031830	CUSTOMER SERVICE SYSTEM	CN	6,196	145	1,920	424	451	2,993	263	-	-
4040000	AMOR LTD TRM PLNT	3032040	SAP	SO	3,965	87	1,076	304	520	1,746	231	1	-
4040000	AMOR LTD TRM PLNT	3032130	PROD & TRANS PLANT	SG	109	2	28	9	15	49	7	0	-
4040000	AMOR LTD TRM PLNT	3032140	MINING PLANT	SO	76	2	21	6	10	33	4	0	-
4040000	AMOR LTD TRM PLNT	3032150	HYDRO PLANT	SO	128	3	35	10	17	57	7	0	-
4040000	AMOR LTD TRM PLNT	3032340	FACILITY INSPECTION REPORTING SYSTEM	SO	23	1	6	2	3	10	1	0	-
4040000	AMOR LTD TRM PLNT	3032360	2002 GRID NET POWER COST MODELING	SO	5	0	1	0	1	2	0	0	-
4040000	AMOR LTD TRM PLNT	3032590	SUBSTATION/CIRCUIT HISTORY OF OPERATIONS	SO	11	0	3	1	1	5	1	0	-
4040000	AMOR LTD TRM PLNT	3032600	SINGLE PERSON SCHEDULING	SO	35	1	10	3	5	16	2	0	-
4040000	AMOR LTD TRM PLNT	3032640	TIBCO SOFTWARE	SO	392	9	106	30	51	173	23	0	-
4040000	AMOR LTD TRM PLNT	3032680	TRANSMISSION WHOLESALE BILLING SYSTEM	SG	4	0	1	0	1	2	0	0	-
4040000	AMOR LTD TRM PLNT	3032690	UTILITY INTERNATIONAL FORECASTING MODEL	SO	470	10	127	36	62	207	27	0	-
4040000	AMOR LTD TRM PLNT	3032710	ROUGE RIVER HYDRO INTANGIBLES	SG	7	0	2	1	1	3	0	0	-
4040000	AMOR LTD TRM PLNT	3032740	GADSBY INTANGIBLE ASSETS	SG	4	0	1	0	1	2	0	0	-
4040000	AMOR LTD TRM PLNT	3032760	SWIFT 2 IMPROVEMENTS	SG	432	6	112	34	61	192	26	0	-
4040000	AMOR LTD TRM PLNT	3032770	NORTH UMPQUA - SETTLEMENT AGREEMENT	SG	24	0	6	2	3	11	1	0	-
4040000	AMOR LTD TRM PLNT	3032780	BEAR RIVER-SETTLEMENT AGREEMENT	SG	5	0	1	0	1	2	0	0	-
4040000	AMOR LTD TRM PLNT	3032780	BEAR RIVER-SETTLEMENT AGREEMENT	SG-U	1	0	0	0	0	0	0	0	-
4040000	AMOR LTD TRM PLNT	3032830	VCPRO - XEROX CUST STMT FRMTR ENHANCE -	SO	71	2	19	5	9	31	4	0	-
4040000	AMOR LTD TRM PLNT	3032860	WEB SOFTWARE	SO	1,857	41	504	142	244	818	108	0	-
4040000	AMOR LTD TRM PLNT	3032900	IDAHO TRANSMISSION CUSTOMER-OWNED ASSETS	SG	360	5	94	28	51	160	22	0	-
4040000	AMOR LTD TRM PLNT	3032990	P8DM - FILENET P8 DOCUMENT MANAGEMENT (E	SO	297	7	81	23	39	131	17	0	-
4040000	AMOR LTD TRM PLNT	3033090	STEAM PLANT INTANGIBLE ASSETS	SG	2,823	41	734	221	400	1,257	169	1	-
4040000	AMOR LTD TRM PLNT	3033170	GTX VERSION 7 SOFTWARE	CN	2,003	47	621	137	146	968	85	-	-
4040000	AMOR LTD TRM PLNT	3033220	MONARCH EMS/SCADA	SO	2,965	65	804	227	389	1,306	173	1	-
4040000	AMOR LTD TRM PLNT	3033230	VREALIZE VMWARE - SHARED	SO	202	4	55	15	27	89	12	0	-
4040000	AMOR LTD TRM PLNT	3033240	IEE - Itron Enterprise Addition	CN	1,126	26	349	77	82	544	48	-	-
4040000	AMOR LTD TRM PLNT	3033250	AMI Metering Software	CN	3,550	83	1,100	243	258	1,715	151	-	-
4040000	AMOR LTD TRM PLNT	3033260	Big Data & Analytics	SO	771	17	209	59	101	339	45	0	-
4040000	AMOR LTD TRM PLNT	3033270	CES - Customer Experience System	CN	558	13	173	38	41	270	24	-	-
4040000	AMOR LTD TRM PLNT	3033280	MAPAPPS - Mapping Systems Application	SO	163	4	44	13	21	72	10	0	-
4040000	AMOR LTD TRM PLNT	3033290	CUSTOMER CONTACTS	CN	94	2	29	6	7	46	4	-	-
4040000	AMOR LTD TRM PLNT	3033310	C&T - ENERGY TRADING SYSTEM	SO	2,273	50	617	174	298	1,001	133	0	-
4040000	AMOR LTD TRM PLNT	3033320	CAS - CONTROL AREA SCHEDULING (TRANSM)	SO	36	1	10	3	5	16	2	0	-
4040000	AMOR LTD TRM PLNT	3033370	DISTRIBUTION INTANGIBLES	WYP	4	-	-	-	4	-	-	-	-
4040000	AMOR LTD TRM PLNT	3033390	RMT TRADE SYSTEM	SO	91	2	25	7	12	40	5	0	-
4040000	AMOR LTD TRM PLNT	3033410	M365	SO	31	1	8	2	4	14	2	0	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	CA	2	2	-	-	-	-	-	-	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	CN	1	0	0	0	0	0	0	-	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	IDU	3	-	-	-	-	-	3	-	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	OR	3	-	3	-	-	-	-	-	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	SE	2	0	0	0	0	1	0	0	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	SG	10,872	159	2,827	850	1,539	4,843	651	3	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	SO	484	11	131	37	64	213	28	0	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	UT	4	-	-	-	-	4	-	-	-



**Amortization Expense (Actuals)**

Sum of Range: 07/2020 - 06/2021

Allocation Method - Factor 2020 Protocol

(Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Account	Secondary Account Name	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	WA	3	-	-	3	-	-	-	-	-
4040000	AMOR LTD TRM PLNT	3034900	MISC - MISCELLANEOUS	WYP	49	-	-	-	49	-	-	-	-
4040000	AMOR LTD TRM PLNT	3035320	HYDRO PLANT INTANGIBLES	SG	148	2	38	12	21	66	9	0	-
4040000	AMOR LTD TRM PLNT	3035320	HYDRO PLANT INTANGIBLES	SG-P	15	0	4	1	2	7	1	0	-
4040000	AMOR LTD TRM PLNT	3316000	STRUCTURES - LEASE IMPROVEMENTS	SG-P	312	5	81	24	44	139	19	0	-
4040000	AMOR LTD TRM PLNT	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	CA	0	0	-	-	-	-	-	-	-
4040000	AMOR LTD TRM PLNT	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	OR	294	-	294	-	-	-	-	-	-
4040000	AMOR LTD TRM PLNT	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	SO	247	5	67	19	32	109	14	0	-
4040000	AMOR LTD TRM PLNT	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	UT	1	-	-	-	-	1	-	-	-
4040000	AMOR LTD TRM PLNT	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	WA	93	-	-	93	-	-	-	-	-
4040000	AMOR LTD TRM PLNT	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	WYP	53	-	-	-	53	-	-	-	-
<b>4040000 Total</b>					<b>48,540</b>	<b>930</b>	<b>13,602</b>	<b>3,687</b>	<b>5,864</b>	<b>21,814</b>	<b>2,633</b>	<b>9</b>	<b>-</b>
4049000	AMR LTD TRM PLNT-OT	566201	Amort Exp - Hydro - UT Klamath Adj	OTHER	4,233	-	-	-	-	-	-	-	4,233
4049000	AMR LTD TRM PLNT-OT	566970	AMORTIZATION JO BILL CREDIT	SG	(284)	(4)	(74)	(22)	(40)	(126)	(17)	(0)	-
<b>4049000 Total</b>					<b>3,949</b>	<b>(4)</b>	<b>(74)</b>	<b>(22)</b>	<b>(40)</b>	<b>(126)</b>	<b>(17)</b>	<b>(0)</b>	<b>4,233</b>
4061000	EL PLNT ACQ ADJ-CM	566920	AMORT ELEC PLANT ACQ ADJ	SG	6,496	95	1,689	508	919	2,894	389	2	-
4061000	EL PLNT ACQ ADJ-CM	566920	AMORT ELEC PLANT ACQ ADJ	UT	302	-	-	-	-	302	-	-	-
<b>4061000 Total</b>					<b>6,798</b>	<b>95</b>	<b>1,689</b>	<b>508</b>	<b>919</b>	<b>3,195</b>	<b>389</b>	<b>2</b>	<b>-</b>
4073000	REGULATORY DEBITS	566940	AMORT OF REG ASSETS - DEBITS	SG	24	0	6	2	3	11	1	0	-
4073000	REGULATORY DEBITS	566983	Amortz Reg A-Unrcvrd Plt/Decom Csts-OR	OR	1,057	-	1,057	-	-	-	-	-	-
4073000	REGULATORY DEBITS	566984	Amortz Reg A-Unrcvrd Plt/Decom Csts-UT	UT	1,332	-	-	-	-	1,332	-	-	-
4073000	REGULATORY DEBITS	586902	Preferred Stock Repurchase Loss Amort	OTHER	124	-	-	-	-	-	-	-	124
<b>4073000 Total</b>					<b>2,538</b>	<b>0</b>	<b>1,064</b>	<b>2</b>	<b>3</b>	<b>1,343</b>	<b>1</b>	<b>0</b>	<b>124</b>
4074100	Reg Credits-BPA Exch	301101	BPA Reg Bill Bal Acct - Residential	IDU	5,176	-	-	-	-	-	5,176	-	-
4074100	Reg Credits-BPA Exch	301101	BPA Reg Bill Bal Acct - Residential	OR	41,529	-	41,529	-	-	-	-	-	-
4074100	Reg Credits-BPA Exch	301101	BPA Reg Bill Bal Acct - Residential	WA	11,930	-	-	11,930	-	-	-	-	-
4074100	Reg Credits-BPA Exch	301201	BPA Reg Bill Bal Acct - Commercial	IDU	315	-	-	-	-	-	315	-	-
4074100	Reg Credits-BPA Exch	301201	BPA Reg Bill Bal Acct - Commercial	OR	922	-	922	-	-	-	-	-	-
4074100	Reg Credits-BPA Exch	301201	BPA Reg Bill Bal Acct - Commercial	WA	546	-	-	546	-	-	-	-	-
4074100	Reg Credits-BPA Exch	301301	BPA Reg Bill Bal Acct - Industrial	IDU	31	-	-	-	-	-	31	-	-
4074100	Reg Credits-BPA Exch	301301	BPA Reg Bill Bal Acct - Industrial	OR	2	-	2	-	-	-	-	-	-
4074100	Reg Credits-BPA Exch	301301	BPA Reg Bill Bal Acct - Industrial	WA	14	-	-	14	-	-	-	-	-
4074100	Reg Credits-BPA Exch	301451	BPA Reg Bill Bal Acct - Irrigation	IDU	1,751	-	-	-	-	-	1,751	-	-
4074100	Reg Credits-BPA Exch	301451	BPA Reg Bill Bal Acct - Irrigation	OR	840	-	840	-	-	-	-	-	-
4074100	Reg Credits-BPA Exch	301451	BPA Reg Bill Bal Acct - Irrigation	WA	660	-	-	660	-	-	-	-	-
4074100	Reg Credits-BPA Exch	301601	BPA Reg Bill Bal Acct - St/Hwy Lighting	OR	0	-	0	-	-	-	-	-	-
<b>4074100 Total</b>					<b>63,718</b>	<b>-</b>	<b>43,294</b>	<b>13,151</b>	<b>-</b>	<b>-</b>	<b>7,274</b>	<b>-</b>	<b>-</b>
4074200	Reg Credits-BPA Exch	505201	Regional Bill Intchg Rec/Del-OR (PP)	OR	(43,294)	-	(43,294)	-	-	-	-	-	-
4074200	Reg Credits-BPA Exch	505202	Regional Bill Intchg Rec/Del-WA (PP)	WA	(13,151)	-	-	(13,151)	-	-	-	-	-
4074200	Reg Credits-BPA Exch	505204	Regional Bill Intchg Rec/Del-ID (RMP)	IDU	(7,274)	-	-	-	-	-	(7,274)	-	-
<b>4074200 Total</b>					<b>(63,718)</b>	<b>-</b>	<b>(43,294)</b>	<b>(13,151)</b>	<b>-</b>	<b>-</b>	<b>(7,274)</b>	<b>-</b>	<b>-</b>
<b>Grand Total</b>					<b>61,824</b>	<b>1,022</b>	<b>16,281</b>	<b>4,175</b>	<b>6,747</b>	<b>26,226</b>	<b>3,007</b>	<b>11</b>	<b>4,357</b>

# **B5. TAXES OTHER THAN INCOME**



Taxes Other Than Income (Actuals)  
Sum of Range: 07/2020 - 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Account	Secondary Account Name	Alloc Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4081000	TAX OTH INC-U OP 1	584960	Taxes Other Non-Income - Credit	(459)	(10)	(124)	(35)	(60)	(202)	(27)	(0)	-
<b>4081000 Total</b>				<b>(459)</b>	<b>(10)</b>	<b>(124)</b>	<b>(35)</b>	<b>(60)</b>	<b>(202)</b>	<b>(27)</b>	<b>(0)</b>	<b>-</b>
4081500	PROPERTY TAXES	579000	PROPERTY TAX	161,965	3,568	43,933	12,410	21,248	71,330	9,443	33	-
4081500	PROPERTY TAXES	579012	Property Tax Exp - Reg Deferral/Amortz	(299)	-	(299)	-	-	-	-	-	-
<b>4081500 Total</b>				<b>161,666</b>	<b>3,568</b>	<b>43,634</b>	<b>12,410</b>	<b>21,248</b>	<b>71,330</b>	<b>9,443</b>	<b>33</b>	<b>-</b>
4081800	FRANCHISE TAXES	578000	FRANCHISE & OCCUPATION TAXES	1,223	1,223	-	-	-	-	-	-	-
4081800	FRANCHISE TAXES	578000	FRANCHISE & OCCUPATION TAXES	29,492	-	29,492	-	-	-	-	-	-
4081800	FRANCHISE TAXES	578000	FRANCHISE & OCCUPATION TAXES	8	-	-	-	-	8	-	-	-
4081800	FRANCHISE TAXES	578000	FRANCHISE & OCCUPATION TAXES	1,864	-	-	-	1,864	-	-	-	-
<b>4081800 Total</b>				<b>32,587</b>	<b>1,223</b>	<b>29,492</b>	<b>-</b>	<b>1,864</b>	<b>8</b>	<b>-</b>	<b>-</b>	<b>-</b>
4081990	MISC TAXES - OTHER	583260	PUBLIC UTILITY TAX	13,664	301	3,706	1,047	1,793	6,018	797	3	-
4081990	MISC TAXES - OTHER	583261	OREGON ENERGY RESOURCE SUPPLIER TAX	1,499	-	1,499	-	-	-	-	-	-
4081990	MISC TAXES - OTHER	583263	MONTANA ENERGY TAX	212	3	53	16	33	95	14	0	-
4081990	MISC TAXES - OTHER	583265	WASHINGTON GROSS REVENUE TAX - SERVICES	21	-	-	21	-	-	-	-	-
4081990	MISC TAXES - OTHER	583266	IDAHO KILOWATT HOUR TAX	48	1	12	4	7	21	3	0	-
4081990	MISC TAXES - OTHER	583267	WYOMING ANNUAL CORPORATION FEE (TAX)	92	-	-	-	92	-	-	-	-
4081990	MISC TAXES - OTHER	583269	MONTANA WHOLESALER ENERGY TAX	153	2	38	11	23	68	10	0	-
4081990	MISC TAXES - OTHER	583273	Wyoming Wind Generation Tax	2,232	33	560	175	316	994	134	1	-
4081990	MISC TAXES - OTHER	583274	Nevada Commerce Tax	21	0	6	2	3	9	1	0	-
4081990	MISC TAXES - OTHER	584100	GOVERNMENT ROYALTIES	459	6	114	34	49	204	29	0	-
<b>4081990 Total</b>				<b>18,402</b>	<b>346</b>	<b>6,009</b>	<b>1,308</b>	<b>2,337</b>	<b>7,410</b>	<b>987</b>	<b>4</b>	<b>-</b>
<b>Grand Total</b>				<b>212,197</b>	<b>5,127</b>	<b>79,011</b>	<b>13,683</b>	<b>25,388</b>	<b>78,545</b>	<b>10,404</b>	<b>37</b>	<b>-</b>



# **B6. FEDERAL INCOME TAXES**



**Interest Expense & Renewable Energy Tax Credits**

Twelve Months Ended - June 2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Acct	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4091000	INC TX UTIL OP INC	SG	(125,907)	(1,843)	(32,738)	(9,844)	(17,821)	(56,084)	(7,541)		(37)
4091000	INC TX UTIL OP INC	SE	(23)	(0)	(6)	(2)	(3)	(10)	(1)	(0)	(0)
4091000	INC TX UTIL OP INC	SE	(23)	(0)	(6)	(2)	(3)	(10)	(1)	(0)	(0)
4091000	INC TX UTIL OP INC	SO	(2)	(0)	(0)	(0)	(0)	(1)	(0)	(0)	(0)
4091000 Total			(125,954)	(1,843)	(32,750)	(9,847)	(17,828)	(56,104)	(7,544)	(37)	-
4191000	AFUDC - OTHER	SNP	(79,166)	(1,647)	(20,226)	(5,892)	(10,385)	(36,312)	(4,678)	(17)	(8)
4191000 Total			(79,166)	(1,647)	(20,226)	(5,892)	(10,385)	(36,312)	(4,678)	(17)	(8)
4211000	GAIN DISPOS PROP	OR	511		511						
4211000	GAIN DISPOS PROP	SO	(2,245)	(49)	(609)	(172)	(294)	(988)	(131)	(0)	(0)
4211000 Total			(1,734)	(49)	(98)	(172)	(294)	(988)	(131)	(0)	(0)
4211900	ASST SLS PRODS-CLEAR	OTHER	0								0
4211900 Total			0								0
4270000	INT ON LNG-TRM DBT	SNP	369,073	7,680	94,293	27,468	48,417	169,290	21,809	77	39
4270000	INT ON LNG-TRM DBT	SNP	31,567	657	8,065	2,349	4,141	14,479	1,865	7	3
4270000	INT ON LNG-TRM DBT	SNP	314	7	80	23	41	144	19	0	0
4270000	INT ON LNG-TRM DBT	SNP	774	16	198	58	102	355	46	0	0
4270000 Total			401,728	8,359	102,636	29,888	52,701	184,268	23,739	84	43
4280000	AMT DBT DISC & EXP	SNP	1,122	23	287	84	147	515	66	0	0
4280000	AMT DBT DISC & EXP	SNP	3,398	71	868	253	446	1,559	201	1	0
4280000 Total			4,521	94	1,155	336	593	2,074	267	1	0
4281000	AMORTZN OF LOSS	SNP	582	12	149	43	76	267	34	0	0
4281000 Total			582	12	149	43	76	267	34	0	0
4290000	AMT PREM ON DEBT	SNP	(11)	(0)	(3)	(1)	(1)	(5)	(1)	(0)	(0)
4290000 Total			(11)	(0)	(3)	(1)	(1)	(5)	(1)	(0)	(0)
4310000	OTHER INTEREST EXP	SNP	8,804	183	2,249	655	1,155	4,038	520	2	1
4310000	OTHER INTEREST EXP	SNP	(3)	(0)	(1)	(0)	(0)	(1)	(0)	(0)	(0)
4310000	OTHER INTEREST EXP	SNP	(1)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
4310000	OTHER INTEREST EXP	SNP	(5)	(0)	(1)	(0)	(1)	(2)	(0)	(0)	(0)
4310000 Total			8,796	183	2,247	655	1,154	4,034	520	2	1
4313000	INT EXP ON REG LIAB	SNP	9,753	203	2,492	726	1,279	4,474	576	2	1
4313000 Total			9,753	203	2,492	726	1,279	4,474	576	2	1
4320000	AFUDC - BORROWED	SNP	(44,281)	(921)	(11,313)	(3,296)	(5,809)	(20,311)	(2,617)	(9)	(5)
4320000	AFUDC - BORROWED	SNP	5,966	124	1,524	444	783	2,736	353	1	1
4320000 Total			(38,315)	(797)	(9,789)	(2,852)	(5,026)	(17,575)	(2,264)	(8)	(4)



Schedule M (Actuals)  
Twelve Months Ending - June 2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

FERC Account	FERC Secondary Acct	JARS Reg Alloc Ctr	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
SCHMAP	105127	Book Depr Allocated to Medicare and M&E	150	3	34	10	17	57	8	0	21
SCHMAP	130100	Non - Deductible Expenses	1,980	44	537	152	260	872	115	0	0
SCHMAP	130400	PMI Non-deductible Exp	10	0	3	1	2	5	1	0	0
SCHMAP	130505	Executive Compensation -162(m)	278	6	75	21	36	122	16	0	0
SCHMAP	130750	Non-deductible Fringe Benefits	280	6	76	21	37	123	16	0	0
SCHMAP	130755	Non-deductible Parking Costs	830	18	225	64	109	366	48	0	0
SCHMAP	505505	Income Tax Interest	5	0	1	0	0	2	0	0	0
SCHMAP	610106	PMI/Fuel Tax Cr	23	0	6	2	3	10	1	0	0
SCHMAP	610107	PMI Dividend Gross Up for Foreign Tax Cr	2	0	0	0	0	1	0	0	0
SCHMAP	920145	PMI Mining Rescue Training Credit Addbac	23	0	6	2	3	10	1	0	0
<b>SCHMAP Total</b>			<b>3,580</b>	<b>78</b>	<b>963</b>	<b>273</b>	<b>469</b>	<b>1,568</b>	<b>208</b>	<b>1</b>	<b>21</b>
SCHMAT	105100	Capitalized Labor Costs	4,075	90	1,105	312	535	1,795	238	1	0
SCHMAT	105120	Book Depreciation	859,860	15,244	194,330	57,215	100,025	327,244	43,368	169	122,266
SCHMAT	1051203	Book Depreciation - Utah DJ Plant Buy Down	225,431	0	0	0	0	225,431	0	0	0
SCHMAT	1051204	Book Depreciation - Idaho Plant Buy Down	16,938	0	0	0	0	0	16,938	0	0
SCHMAT	105121	Book Depreciation - Oregon Plant Buy Dow	131,758	0	131,758	0	0	0	0	0	0
SCHMAT	105130	PMI Book Depreciation	15,868	223	3,954	1,164	2,435	7,074	1,013	5	0
SCHMAT	105140	CIAC	121,888	4,315	32,267	7,794	11,703	59,334	6,476	0	0
SCHMAT	105140	Highway relocation	3,814	135	1,010	244	366	1,856	203	0	0
SCHMAT	105146	Avoided Costs	72,599	1,511	18,548	5,403	9,524	33,301	4,290	15	8
SCHMAT	210200	Capitalization of Test Energy	2,663	39	692	208	377	1,186	159	1	0
SCHMAT	220100	Prepaid Taxes-property taxes	(4,930)	(109)	(1,337)	(378)	(647)	(2,171)	(287)	(1)	0
SCHMAT	320270	Bad Debts Allowance - Cash Basis	18,426	406	4,998	1,412	523	26	1,019	192	0
SCHMAT	320280	Reg Asset FAS 158 Post Retire Liab	(521)	(11)	(141)	(40)	(69)	(229)	(30)	(0)	0
SCHMAT	320281	Reg Asset - Post-Retirement Settlement L	3,703	82	1,004	284	486	1,631	216	1	0
SCHMAT	320282	Reg Asset - Post-Retirement Settlement L	1,689	0	0	0	0	1,689	0	0	0
SCHMAT	415115	Reg Asset - UT - STEP Pilot Programs Balan	553	0	0	0	0	0	0	0	0
SCHMAT	415301	Environmental Costs WA	231	0	0	231	0	0	0	0	0
SCHMAT	415424	Contra Reg Asset - Deer Creek Abandonmen	18,094	254	4,509	1,327	2,776	8,066	1,155	6	0
SCHMAT	415426	Reg Asset - 2020 GRC - Meters Replaced b	671	0	0	0	0	0	0	0	671
SCHMAT	415430	Reg Asset - CA - Transportation - Electr	(159)	0	0	0	0	0	0	0	(159)
SCHMAT	415502	WA Disallowed Colstrip #3 Write-off	30	0	0	30	0	0	0	0	0
SCHMAT	415702	Reg Asset - Lake Side Liq.	27	0	0	0	27	0	0	0	0
SCHMAT	415703	Goodroe Hills Liquidation Damages - WY	21	0	0	0	21	0	0	0	0
SCHMAT	415710	Reg Liability - WA - Accelerated Depreci	(2,406)	0	0	(2,406)	0	0	0	0	0
SCHMAT	415723	Reg Asset - Cholla U4 - O&M Depreciation	806	0	0	0	0	0	806	0	0
SCHMAT	415728	Contra Reg Asset - Cholla U4 Closure - O	620	0	620	0	0	0	0	0	0
SCHMAT	415729	Contra Reg Asset - Cholla U4 Closure - U	1,556	0	0	0	0	1,556	0	0	0
SCHMAT	415730	Contra Reg Asset - Cholla U4 Closure - W	517	0	0	0	517	0	0	0	0
SCHMAT	415734	Reg Asset - Cholla Unrecovered Plant - C	121	0	0	0	0	0	0	0	0
SCHMAT	415840	Reg Asset-Deferred OR Independent Evalua	(38)	0	0	0	0	0	0	0	(38)
SCHMAT	415841	Reg Asset - Emergency Service Programs -	(5)	0	0	0	0	0	0	0	(5)
SCHMAT	415852	Powerdate Decommissioning Reg Asset - ID	12	0	0	0	0	0	12	0	0
SCHMAT	415855	CA - January 2010 Storm Costs	(78)	0	0	0	0	0	0	0	(78)
SCHMAT	415857	ID - Deferred Overburden Costs	36	0	0	0	0	0	0	0	36
SCHMAT	415858	WY - Deferred Overburden Costs	101	0	0	0	101	0	0	0	0
SCHMAT	415868	Deferred Excess Net PowerCosts - OR	(553)	0	0	0	0	0	0	0	(553)
SCHMAT	415876	Deferral of Renewable Energy Credit - WY	1,405	0	0	0	0	0	0	0	1,405
SCHMAT	415883	Reg Liability - Depreciation Decrease -	131	0	0	0	0	0	0	0	131
SCHMAT	415926	Reg Liability - Depreciation Decrease -	(564)	0	0	0	0	0	0	0	(564)
SCHMAT	415927	Reg Liability - Depreciation Decrease De	7	0	0	7	0	0	0	0	0
SCHMAT	415939	Reg Asset - Carbon Plant Decommissioning	523	0	0	0	523	0	0	0	0
SCHMAT	415942	Reg Liability - Steam Decommissioning -	1,785	0	0	1,785	0	0	0	0	0
SCHMAT	425105	Reg Asset - OR Asset Sale Gain Giveback	(686)	0	0	0	0	0	0	0	(686)
SCHMAT	425360	Hermiston Swap	172	3	45	13	24	76	10	0	0
SCHMAT	430100	Customer Service / Weatherization	(196,674)	0	0	0	0	0	0	0	(196,674)
SCHMAT	505125	ACCURED ROYALTIES	3,253	46	811	239	499	1,450	208	1	0
SCHMAT	505400	Bonus Liability	(643)	(14)	(174)	(49)	(84)	(283)	(37)	(0)	0
SCHMAT	505450	Accrued Payroll Taxes - PMI	16,954	373	4,599	1,299	2,224	7,466	988	3	0
SCHMAT	5054501	Accrued Payroll Taxes - PMI	13	0	3	1	2	6	1	0	0
SCHMAT	505520	Bonus Accrual - PMI	65	1	16	5	10	29	4	0	0
SCHMAT	505600	Sick Leave Vacation & Personal Time	72	2	20	6	9	32	4	0	0
SCHMAT	505601	Sick Leave Accrual - PMI	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	0
SCHMAT	505700	Accrued Retention Bonus	(6)	(0)	(2)	(1)	(1)	(3)	(0)	(0)	0



Schedule M (Actuals)  
Twelve Months Ending - June 2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

FERC Account	FERC Secondary Acct	JARS Reg Alloc Ctr	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
SCHMAT	605100	Trojan Decommissioning Costs	(46)	(1)	(12)	(4)	(7)	(20)	(3)	(0)	0
SCHMAT	605710	Reverse Accrued Final Reclamation	(843)	0	0	0	0	0	0	0	0
SCHMAT	605715	Trapper Mine Contract Obligation	832	12	207	61	128	371	53	0	(843)
SCHMAT	610000	Coal Mine Development-PMI	(30)	(0)	(7)	(2)	(5)	(13)	(2)	(0)	0
SCHMAT	610141	WA Rate Refunds	1,850	0	0	0	0	0	0	0	1,850
SCHMAT	610145	REG LIAB-DSM	(2,786)	0	0	0	0	0	0	0	(2,786)
SCHMAT	610150	REG LIABILITY - BRIDGER MINE ACCELERATED	1,820	0	1,820	0	0	0	0	0	0
SCHMAT	610155	REG LIABILITY - Plant Closure Cost - WA	678	0	0	678	0	0	0	0	0
SCHMAT	705241	REG LIABILITY - CA California Alternativ	373	0	0	0	0	0	0	0	373
SCHMAT	705245	REG LIABILITY - OR DIRECT ACCESS 5 YEAR	747	0	0	0	0	0	0	0	747
SCHMAT	705266	Reg Liability - Energy Savings Assistance	53	0	0	0	0	0	0	0	53
SCHMAT	705267	Reg Liability - WA Decoupling Mechanism	(13,025)	0	0	0	0	0	0	0	(13,025)
SCHMAT	705336	Reg Liability - Sale of Renewable Energy	801	0	0	0	0	0	0	0	801
SCHMAT	705340	Reg Liability - Excess Income Tax Deferr	(2,528)	0	0	0	0	0	0	0	(2,528)
SCHMAT	705341	Reg Liability - Excess Income Tax Deferr	(523)	0	0	0	0	0	0	0	(523)
SCHMAT	705342	Reg Liability - Excess Income Tax Deferr	(41,731)	0	0	0	0	0	0	0	(41,731)
SCHMAT	705343	Reg Liability - Excess Income Tax Deferr	(3,142)	0	0	0	0	0	0	0	(3,142)
SCHMAT	705344	Reg Liability - Excess Income Tax Deferr	35	0	0	0	0	0	0	0	35
SCHMAT	705352	Reg Liability - CA Klamath River Dams Re	265	265	0	0	0	0	0	0	0
SCHMAT	705400	Reg Liability - OR Injuries & Damages Re	1,485	0	1,485	0	0	0	0	0	0
SCHMAT	705410	Reg Liability - Cholla Decommissioning -	(30)	(30)	0	0	0	0	0	0	0
SCHMAT	705411	Reg Liability - Cholla Decommissioning -	(113)	0	0	0	0	0	(113)	0	0
SCHMAT	705412	Reg Liability - Cholla Decommissioning -	8,685	0	8,685	0	0	0	0	0	0
SCHMAT	705413	Reg Liability - Cholla Decommissioning -	19,601	0	0	0	0	19,601	0	0	0
SCHMAT	705414	Reg Liability - Cholla Decommissioning -	(280)	0	0	0	(280)	0	0	0	0
SCHMAT	705420	Reg Liability - CA GHG Allowance Revenue	1,091	0	0	0	0	0	0	0	1,091
SCHMAT	705425	Reg Liability - Bridger Mine Accelerated	1,275	0	0	1,275	0	0	0	0	0
SCHMAT	705450	Reg Liability - Property Insurance Reser	131	131	0	0	0	0	0	0	0
SCHMAT	705451	Reg Liability - OR Property Insurance Re	(7,968)	0	(7,968)	0	0	0	0	0	0
SCHMAT	705452	Reg Liability - Property Insurance Reser	114	0	0	114	0	0	0	0	0
SCHMAT	705453	Reg Liability - ID Property Insurance Re	114	0	0	0	0	0	114	0	0
SCHMAT	705455	Reg Liability - WY Property Insurance Re	(377)	0	0	0	(377)	0	0	0	0
SCHMAT	705511	Regulatory Liability - CA Deferred Excess	529	0	0	0	0	0	0	0	529
SCHMAT	705515	Regulatory Liability - OR Deferred Excess	(24,739)	0	0	0	0	0	0	0	(24,739)
SCHMAT	705519	Regulatory Liability - WA Deferred Excess	(3,572)	0	0	0	0	0	0	0	(3,572)
SCHMAT	705521	Regulatory Liability - WY Deferred Excess	(2,731)	0	0	0	0	0	0	0	(2,731)
SCHMAT	705531	Regulatory Liability - UT Solar Feed-in	(1,933)	0	0	0	0	0	0	0	(1,933)
SCHMAT	715105	MCI FOG Wire Lease	(1)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	0
SCHMAT	715720	NW Power Act-WA	244	0	0	0	0	0	0	0	244
SCHMAT	715810	Chehalis WA EFSEC CO2 Mitigation Obliga	(1)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	0
SCHMAT	720300	Pension / Retirement (Accrued / Prepaid)	(29)	(1)	(8)	(2)	(4)	(13)	(2)	(0)	0
SCHMAT	740100	Post Merger Loss-Reacquired Debt	582	12	149	43	76	267	34	0	0
SCHMAT	910245	Contra Receivable from Joint Owners	(744)	(16)	(202)	(57)	(98)	(328)	(43)	(0)	0
SCHMAT	910905	Bridger Coal Company Underground Mine Co	1,250	18	311	92	192	557	80	0	0
SCHMAT	920110	PMWY Extraction Tax	(303)	(4)	(75)	(22)	(46)	(135)	(19)	(0)	0
<b>SCHMAT Total</b>			<b>1,257,858</b>	<b>23,165</b>	<b>404,741</b>	<b>78,802</b>	<b>133,407</b>	<b>705,954</b>	<b>77,099</b>	<b>206</b>	<b>(165,515)</b>
SCHMDP	1102051	TAX PERCENTAGE DEPLETION - DEDUCTION	9	2	2	1	1	4	1	0	0
SCHMDP	120100	Preferred Dividend - PPL	110	2	28	8	14	50	6	0	0
SCHMDP	109000	PMIDepletion	6,401	90	1,595	469	982	2,853	409	2	0
<b>SCHMDP Total</b>			<b>6,520</b>	<b>92</b>	<b>1,626</b>	<b>478</b>	<b>998</b>	<b>2,908</b>	<b>416</b>	<b>2</b>	<b>0</b>
SCHMDT	105122	Repair Deduction	154,035	2,254	40,052	12,043	21,802	68,613	9,226	45	0
SCHMDT	105125	Tax Depreciation	1,225,253	23,303	323,556	54,425	162,805	550,873	71,610	291	0
SCHMDT	105126	PMI Tax Depreciation	3,256	46	811	239	500	1,451	208	1	0
SCHMDT	105137	Capitalized Depreciation	7,807	172	2,118	598	1,024	3,438	455	2	0
SCHMDT	1051411	AFUDC - DEBT	38,222	795	9,765	2,845	5,014	17,532	2,259	4	0
SCHMDT	1051412	AFUDC - Equity	78,974	1,643	20,177	5,878	10,360	36,225	4,667	17	0
SCHMDT	105143	Basis Intangible Difference	284	6	73	21	37	130	17	0	0
SCHMDT	105152	Gain/(Loss) on Prop Dispositions	119,531	2,633	32,423	9,159	15,681	52,642	6,969	25	0
SCHMDT	105153	Contract Liability Basis Adjustment -Che	(1)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	0
SCHMDT	105175	Removal Cost (net of salvage)	78,604	1,731	21,321	6,023	10,312	34,617	4,583	16	0
SCHMDT	1052203	Cholla SHL-NOPA (Lease Amortization)	2,076	30	540	162	294	925	124	1	0
SCHMDT	105470	Book Gain/Loss on Land Sales	2,100	46	570	161	275	925	122	0	0
SCHMDT	1102051	PMI - Fuel Cost Adjustment	33	0	8	2	5	15	2	0	0
SCHMDT	205025	PMI - Fuel Cost Adjustment	(5,845)	(82)	(1,457)	(429)	(897)	(2,606)	(373)	(2)	0
SCHMDT	205200	Coal M&S Inventory Write-Off	1,063	38	281	68	102	517	56	0	0





Schedule M (Actuals)  
Twelve Months Ending - June 2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

FERC Account	FERC Secondary Acct	JARS Reg Alloc Ctr	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
SCHMDT	505510	Vacation Accrual - PMI	(40)	(1)	(10)	(3)	(6)	(18)	(3)	(0)	0
SCHMDT	605103	ARO/Reg Diff - Tojan - WA	(9)	0	(9)	0	0	0	0	0	0
SCHMDT	610100	PMIDEVT COST AMORT	(676)	(9)	(168)	(50)	(104)	(301)	(43)	(0)	0
SCHMDT	6101001	AMORT NIPAS 99-00 RAR	28	1	8	2	4	13	2	0	0
SCHMDT	610111	Bridger Coal Company Gain/Loss on Assets	(37)	(1)	(9)	(3)	(6)	(17)	(2)	(0)	0
SCHMDT	610114	PMI EITF Pre Stripping Costs	(693)	(13)	(222)	(65)	(137)	(398)	(57)	(0)	0
SCHMDT	610146	OR Reg Asset/Liability Consolidation	11	0	11	0	0	0	0	0	0
SCHMDT	705261	Reg Liability - Sale of Renewable Energy	(133)	0	0	0	0	0	0	0	(133)
SCHMDT	705265	Reg Liab - OR Energy Conservation Charge	179	0	0	0	0	0	0	0	179
SCHMDT	705337	Reg Liability - Sale of Renewable Energy	(634)	0	0	0	0	0	0	0	(634)
SCHMDT	705454	Reg Liability - UT Property Insurance Re	6,131	0	0	0	0	6,131	0	0	0
SCHMDT	705755	Reg Liability - Non current Reclass - OI	(596)	0	0	0	0	0	0	0	(596)
SCHMDT	720200	Deferred Comp Plan Benefits-PPL	(1,287)	(28)	(349)	(99)	(169)	(567)	(75)	(0)	0
SCHMDT	720500	Severance Accrual	(2,802)	(62)	(760)	(215)	(366)	(1,234)	(163)	(1)	0
SCHMDT	720800	FAS 158 Pension Liability	24,712	544	6,703	1,893	3,242	10,883	1,441	5	0
SCHMDT	720810	FAS 158 Post-Retirement Liability	3,180	70	863	244	417	1,401	185	1	0
SCHMDT	720815	FAS 158 Post-Retirement Liability	(1,430)	(31)	(388)	(110)	(186)	(630)	(83)	(0)	0
SCHMDT	910530	Injuries and Damages Reserve	(251,916)	(5,549)	(66,333)	(19,302)	(33,048)	(110,944)	(14,688)	(52)	0
<b>SCHMDT Total</b>			<b>1,617,837</b>	<b>30,241</b>	<b>426,916</b>	<b>85,431</b>	<b>210,607</b>	<b>704,565</b>	<b>100,145</b>	<b>385</b>	<b>21,187</b>
<b>Grand Total</b>			<b>2,885,795</b>	<b>53,577</b>	<b>834,246</b>	<b>164,984</b>	<b>345,480</b>	<b>1,414,995</b>	<b>177,868</b>	<b>593</b>	<b>(144,307)</b>

# **B7. D.I.T. EXPENSE AND I.T.C. ADJUSTMENT**



Deferred Income Tax Expense (Actuals)  
 Twelve Months Ending - June 2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

FERC Account	FERC Secondary Act	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4101000	105122	Repair Deduction	37,872	554	9,847	2,961	5,360	16,870	2,268	11	-
4101000	105125	Tax Depreciation	301,248	5,729	79,559	13,381	40,028	135,441	17,607	71	-
4101000	105126	282DIT PMIDepreciation-Tax	801	11	199	59	123	357	51	0	-
4101000	105137	Capitalized Depreciation	1,920	42	521	147	252	845	112	0	-
4101000	105141	AFUDC Debt	9,398	196	2,401	699	1,233	4,311	555	2	1
4101000	1051411	AFUDC Equity	19,417	404	4,961	1,445	2,547	8,906	1,147	4	2
4101000	105143	282Basis Intangible Difference	70	1	18	5	9	32	4	0	0
4101000	105152	Gain / (Loss) on Prop. Disposition	29,389	647	7,972	2,252	3,855	12,943	1,714	6	-
4101000	105153	Contract Liability Basis Adjustment -Che	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	-
4101000	105175	Cost of Removal	19,326	426	5,242	1,481	2,535	8,511	1,127	4	-
4101000	1052203	Cholla SHL NOPA (Lease Amortization)	510	7	133	40	72	227	31	0	-
4101000	105470	282Book Gain/Loss on Land Sales	516	11	140	40	68	227	30	0	-
4101000	110205	SRC Tax Percentage Depletion Deduct	8	0	2	1	1	4	1	0	-
4101000	205025	PMI-Fuel Cost Adjustment	(1,437)	(20)	(358)	(105)	(220)	(641)	(92)	(0)	-
4101000	205200	M&S INVENTORY WRITE-OFF	261	9	69	17	25	127	14	-	-
4101000	205205	Inventory Reserve - PMI	(242)	(3)	(60)	(18)	(37)	(108)	(15)	(0)	-
4101000	205411	190PMISec263A	190	3	47	14	29	85	12	0	-
4101000	210100	283OR PUC Prepaid Taxes	122	-	122	-	-	-	-	-	-
4101000	210120	283UT PUC Prepaid Taxes	175	-	-	-	-	175	-	-	-
4101000	210130	283ID PUC Prepaid Taxes	(19)	-	-	-	-	-	(19)	-	-
4101000	210170	Prepaid - FSA O&M - West	(126)	(2)	(33)	(10)	(18)	(56)	(8)	(0)	-
4101000	210175	Prepaid - FSA O&M - East	236	3	61	18	33	105	14	0	-
4101000	210180	283Prepaid Membership Fees-EEL WSCC	397	9	108	30	52	175	23	0	-
4101000	210185	Prepaid Aircraft Maintenance Costs	(23)	(0)	(6)	(2)	(3)	(10)	(1)	(0)	-
4101000	210190	Prepaid Water Rights	0	0	0	0	0	0	0	0	-
4101000	320279	Reg Liability - FAS 158 Post Retirement	(128)	(3)	(35)	(10)	(17)	(56)	(7)	(0)	-
4101000	415200	190DEF REG ASSET-TRANSM SVC DEPOSIT	8	0	2	1	1	3	0	0	-
4101000	415200	REG ASSET - OR TRANSPORTATIONELECTRIFIC	538	-	-	-	-	-	-	-	538
4101000	415260	Reg Asset - Fire Risk Mitigation - CA	2,756	-	-	-	-	-	-	-	2,756
4101000	415300	283-Hazardous Waste/Environmental Cleanup	5,964	131	1,618	457	782	2,627	348	1	-
4101000	415410	Reg Asset - Energy West Mining	803	11	200	59	123	358	51	0	-
4101000	415411	Contrara DeerCreekAband CA	(94)	(17)	-	-	-	-	(94)	-	-
4101000	415411	Contrara DeerCreekAband ID	61	-	-	-	-	-	-	-	-
4101000	415413	Contrara DeerCreekAband OR	365	-	-	-	-	365	-	-	-
4101000	415414	Contrara DeerCreekAband UT	196	-	-	196	-	-	-	-	-
4101000	415415	Contrara DeerCreekAband WA	42	-	-	-	42	-	-	-	-
4101000	415416	Contrara DeerCreekAband WY	444	-	-	-	-	-	-	-	-
4101000	415417	Contrara UMWA Pension CA	52	-	-	-	-	-	-	-	444
4101000	415431	Reg Asset - WA Transportation Electrific	992	-	-	-	-	-	-	-	52
4101000	415520	Reg Asset - WA Decoupling Mechanism	(3,245)	-	-	-	-	(3,245)	-	-	992
4101000	415531	Reg Asset - UT 2017 Protocol - MSP Defer	(983)	-	-	-	(983)	-	-	-	-
4101000	415532	Reg Asset - WY 2017 Protocol - MSP Defer	1	-	-	-	-	-	-	-	1
4101000	415545	Reg Asset - WA Mervin Project	(790)	-	-	-	-	-	-	-	(790)
4101000	415655	CA GHG Allowance	(20)	-	-	-	-	-	-	-	(20)
4101000	415675	Reg Asset - UT - Deferred Stock Redempti	(7)	-	-	-	-	-	-	-	(7)
4101000	415676	Reg Asset - WY - Deferred Stock Redempti	(3)	-	-	-	-	-	-	-	(3)
4101000	415677	Reg Asset - Pref Stock Redemp Loss WA	140	-	-	-	-	-	-	-	140
4101000	415680	190Def Intervenor Funding Grants-OR	26	-	-	-	-	-	-	-	26
4101000	415701	CA Deferred Intervenor Funding	181	-	-	-	-	-	-	-	181
4101000	415720	Reg Asset - Community Solar - OR	64	-	-	64	-	-	-	-	-
4101000	415755	Reg Asset - Major Mtc Exp - Coistrip U4	-	-	-	-	-	-	-	-	-





Deferred Income Tax Expense (Actuals)  
 Twelve Months Ending - June 2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

FERC Account	FERC Secondary Acct	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4101000	Insurance Reserve	SO	28,336	624	7,686	2,171	3,717	12,479	1,652	6	-
4101000	Reg Asset - Pension Settlement - CA	OTHER	(6)	-	-	-	-	-	-	-	(6)
4101000	Reg Asset - CA Mobile Home Park Conversi	OTHER	(2)	-	-	-	-	-	-	-	(2)
4101000	Reg Asset - UT Subscriber Solar Program	UT	5	-	-	-	-	5	-	-	-
4101000	Reg Asset - OR Solar Feed-in Tariff	OTHER	(31)	-	-	-	-	-	-	-	(31)
4101000	Deferred Excess Net Power Costs CA	OTHER	(729)	-	-	-	-	-	-	-	(729)
4101000	Deferred Excess Net Power Costs - WY 09	OTHER	(1,433)	-	-	-	-	-	-	-	(1,433)
4101000	Deferred Excess Net Power Costs - UT	OTHER	4,304	-	-	-	-	-	-	-	4,304
4101000	REG ASSET - UT LIQUIDATED DAMAGES NAUGHT	UT	(9)	-	-	-	(1)	(9)	-	-	-
4101000	Reg Asset - WY Liquidation Damages N2	WYP	(1)	-	-	-	-	-	-	-	-
4101000	Deferral of Renewable Energy Credit - WA	OTHER	(41)	-	-	-	-	-	-	-	(41)
4101000	Reg Asset - Noncurrent Reclass - Other	OTHER	147	-	-	-	-	-	-	-	147
4101000	Deferred Excess Net Power Costs - ID 09	OTHER	(2,034)	-	-	-	-	-	-	-	(2,034)
4101000	Reg Asset - Depreciation Increase - ID	IDU	1,488	-	-	-	-	-	1,488	-	-
4101000	Reg Asset - Depreciation Increase - UT	UT	(31)	-	-	-	-	(31)	-	-	-
4101000	Reg Asset - Depreciation Increase - WY	WYP	(109)	-	-	-	(109)	-	-	-	-
4101000	Reg Asset - Carbon Unrecovered Plant - I	IDU	(59)	-	-	-	-	-	(59)	-	-
4101000	Reg Asset - Carbon Unrecovered Plant - U	UT	173	-	-	-	-	173	-	-	-
4101000	Reg Asset - Carbon Unrecovered Plant - W	WYP	(142)	-	-	-	(142)	-	-	-	-
4101000	Reg Asset - Carbon Decommissioning - CA	CA	(85)	(85)	-	-	-	(4,254)	-	-	-
4101000	Reg Liability - Contra - Carbon Decommiss	UT	(55)	-	-	-	(55)	-	-	-	-
4101000	REG ASSET - CARBON PLANT DECOMMISSIONING	SG	(395)	(6)	(103)	(31)	(56)	(176)	(24)	(0)	-
4101000	Reg Asset - Covid-19 Bill Assistance Pro	OTHER	1,140	-	-	-	-	-	1,140	-	-
4101000	Reg Asset - Covid-19 Bill Assistance Pro	OTHER	363	-	-	-	-	-	-	-	363
4101000	1900Deferred Regulatory Expense-IDU	IDU	9	-	-	-	-	-	-	-	-
4101000	283Unreamed Joint Use Pole Contact Revnu	SNPD	(23)	(1)	(6)	(1)	(2)	(11)	(1)	-	-
4101000	UT Kalamath Relicensing Costs	OTHER	(966)	-	-	-	-	-	-	-	(966)
4101000	Reg Asset Balance Reclass	OTHER	(685)	-	-	-	-	-	-	-	(685)
4101000	Reg Asset - Other - Balance Reclass	OTHER	1,162	-	-	-	-	-	-	-	1,162
4101000	1900PMI Vacation/Bonus	SE	(10)	(0)	(2)	(1)	(2)	(4)	(1)	(0)	-
4101000	ARO/Reg Diff - Trojan - WA	WA	(2)	-	-	(2)	-	-	-	-	-
4101000	283PMI AMORT DEVELOPMENT	SE	(166)	(2)	(41)	(12)	(25)	(74)	(11)	(0)	-
4101000	1900NOPA 103-99-00 RAR	SO	7	0	2	1	1	3	0	0	-
4101000	283PMI SALE OF ASSETS	SE	(9)	(0)	(2)	(1)	(1)	(4)	(1)	(0)	-
4101000	PMI EITF Pre stripping Cost	SE	(219)	(3)	(55)	(16)	(34)	(98)	(14)	(0)	-
4101000	1900R Reg Asset/Liability Consol	OR	3	-	-	-	-	-	-	-	-
4101000	Reg Liability - Sale of Renewable Energy	OTHER	(33)	-	-	-	-	-	-	-	(33)
4101000	Reg Liab - OR Energy Conservation Charge	OTHER	44	-	-	-	-	-	-	-	44
4101000	Reg Liability - Sale of Renewable Energy	OTHER	(156)	-	-	-	-	-	-	-	(156)
4101000	Reg Liability - UT Property Insurance Re	UT	1,507	-	-	-	-	1,507	-	-	-
4101000	Reg Liability - Non current Reclass - Ot	OTHER	(147)	-	-	-	-	-	-	-	(147)
4101000	1900Deferred Compensation Payout	SO	(316)	(7)	(86)	(24)	(41)	(139)	(18)	(0)	-
4101000	1900Severance	SO	(689)	(15)	(187)	(53)	(90)	(303)	(40)	(0)	-
4101000	190FAS 158 Pension Liability	SO	6,076	134	1,648	466	797	2,676	354	1	-
4101000	190FAS 158 Post Retirement Liability	SO	782	17	212	60	103	344	46	0	-
4101000	FAS 158 Post Retirement Liability	SO	(352)	(8)	(95)	(27)	(46)	(155)	(20)	(0)	-
4101000	190Injuries & Damages	SO	(61,938)	(1,364)	(16,801)	(4,746)	(8,125)	(27,277)	(3,611)	(13)	-
<b>4101000 Total</b>			<b>397,771</b>	<b>7,435</b>	<b>104,964</b>	<b>21,005</b>	<b>51,781</b>	<b>173,229</b>	<b>24,622</b>	<b>95</b>	<b>5,209</b>
4111000	283FAS 109 Def Tax Liab WA-NUTIL	OTHER	1,595	-	-	-	-	-	-	-	1,595
4111000	1900CAPITALIZED LABOR COSTS	SO	(1,002)	(22)	(272)	(77)	(131)	(441)	(58)	(0)	-



Deferred Income Tax Expense (Actuals)  
Twelve Months Ending - June 2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

FERC Account	FERC Secondary Acct	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4111000	1051151	CA	(328)	(328)	-	-	-	-	-	-	-
4111000	1051152	FERC	(187)	(187)	-	-	-	-	-	(187)	-
4111000	1051153	IDU	(416)	(416)	-	-	-	-	(416)	-	-
4111000	1051154	OR	(1,937)	(1,937)	(1,937)	-	-	-	-	-	-
4111000	1051155	OTHER	(79)	(79)	-	-	-	-	-	-	(79)
4111000	1051156	UT	(4,820)	(4,820)	-	-	-	(4,820)	-	-	-
4111000	1051157	WA	1,147	1,147	-	1,147	-	-	-	-	-
4111000	1051158	WYP	(1,137)	(1,137)	-	(1,137)	-	-	-	-	-
4111000	1051159	WYU	(1,107)	(1,107)	-	(1,107)	-	-	-	-	-
4111000	1051171	CA	(21)	(21)	-	-	-	-	-	-	-
4111000	1051172	FERC	(0)	(0)	-	-	-	-	-	(0)	-
4111000	1051173	IDU	(89)	(89)	-	-	-	-	(89)	-	-
4111000	1051174	OR	(344)	(344)	(344)	-	-	-	-	-	-
4111000	1051175	UT	(588)	(588)	-	-	-	(588)	-	-	-
4111000	1051176	WA	(315)	(315)	-	(315)	-	-	-	-	-
4111000	1051177	WYP	(232)	(232)	-	(232)	-	-	-	-	-
4111000	105120	SCHMDEXP	(211,410)	(3,748)	(47,779)	(14,067)	(24,593)	(80,458)	(10,663)	(42)	(30,061)
4111000	1051201	UT	(55,426)	-	-	-	-	(55,426)	-	-	-
4111000	1051203	IDU	(4,165)	-	-	-	-	-	(4,165)	-	-
4111000	1051204	OR	(32,395)	-	(32,395)	-	-	-	-	-	-
4111000	105130	CIAC	(3,901)	(55)	(972)	(286)	(599)	(1,739)	(249)	(1)	-
4111000	105140	SE	(29,968)	(1,061)	(7,933)	(1,916)	(2,877)	(14,588)	(1,592)	-	-
4111000	105142	SNPD	(938)	(33)	(248)	(60)	(90)	(456)	(50)	-	-
4111000	105146	SG	(17,850)	(371)	(4,560)	(1,328)	(2,342)	(8,187)	(1,055)	(4)	(2)
4111000	105220	SG	(655)	(10)	(170)	(51)	(83)	(292)	(39)	(0)	-
4111000	210200	SG	(1,109)	(16)	(288)	(87)	(157)	(494)	(66)	(0)	-
4111000	220100	GPS	1,212	27	329	93	159	534	71	0	-
4111000	320270	BADDEBT	(874)	(18)	(423)	(129)	(6)	(250)	(47)	-	-
4111000	320280	SO	(4,530)	(100)	(1,229)	(347)	(594)	(1,995)	(264)	(1)	-
4111000	320281	SO	128	3	35	10	17	56	7	0	-
4111000	320282	SO	(910)	(20)	(247)	(70)	(119)	(401)	(63)	(0)	-
4111000	415115	UT	(415)	-	-	-	-	(415)	-	-	-
4111000	415301	OTHER	(136)	-	-	-	-	-	-	-	(136)
4111000	415424	WA	(57)	-	-	(57)	-	-	-	-	-
4111000	415426	SE	(4,449)	(62)	(1,109)	(326)	(683)	(1,983)	(284)	(2)	-
4111000	415430	OTHER	(165)	-	-	-	-	-	-	-	(165)
4111000	415510	OTHER	39	-	-	-	-	-	-	-	39
4111000	415645	WA	(7)	-	-	(7)	-	-	-	-	-
4111000	415702	OTHER	302	-	-	-	-	-	-	-	302
4111000	415703	WYP	(7)	-	-	-	(7)	-	-	-	-
4111000	415710	WA	(5)	-	-	-	(5)	-	-	-	-
4111000	415723	IDU	(198)	-	-	592	-	-	-	-	-
4111000	415728	SG	0	0	0	0	0	0	0	0	0
4111000	415729	OR	(152)	-	(152)	-	-	-	-	-	-
4111000	415730	UT	(383)	-	-	-	-	-	-	-	-
4111000	415734	CA	(127)	-	-	-	(127)	-	-	-	-
4111000	415840	OTHER	(30)	(30)	-	-	-	-	-	-	-
4111000	415841	OTHER	9	9	-	-	-	-	-	-	9
4111000	415852	IDU	1	1	-	-	-	-	1	-	-
4111000	415852	IDU	(3)	(3)	-	-	-	-	(3)	-	-





Deferred Income Tax Expense (Actuals)  
 Twelve Months Ending - June 2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

FERC Account	FERC Secondary Act	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
4111000	705342	Reg Liability - Excess Income Tax Deferr	10,260	-	-	-	-	-	-	-	10,260
4111000	705343	Reg Liability - Excess Income Tax Deferr	773	-	-	-	-	-	-	-	773
4111000	705344	Reg Liability - Excess Income Tax Deferr	(9)	(9)	-	-	-	-	-	-	(9)
4111000	705346	Deferral of Protected PP&E ARAM - CA	(482)	(482)	-	-	-	-	-	-	-
4111000	705347	Deferral of Protected PP&E ARAM - ID	1,552	-	-	-	-	-	1,552	-	-
4111000	705348	Deferral of Protected PP&E ARAM - OR	(6,098)	-	(6,098)	-	-	-	-	-	-
4111000	705349	Deferral of Protected PP&E ARAM - UT	(29,879)	-	-	-	-	(29,879)	-	-	-
4111000	705350	Deferral of Protected PP&E ARAM - WA	1,364	-	-	1,364	-	-	-	-	-
4111000	705351	Deferral of Protected PP&E ARAM - WY	4,853	-	-	-	4,853	-	-	-	-
4111000	705352	Reg Liability - CA Klamath River Dams Re	(65)	(65)	-	-	-	-	-	-	-
4111000	705400	Reg Liability - OR Injuries & Damages Re	(365)	(365)	-	-	-	-	-	-	-
4111000	705410	Reg Liability - Cholla Decommissioning - CA	7	7	-	-	-	-	-	-	-
4111000	705411	Reg Liability - Cholla Decommissioning - OR	28	-	-	-	-	-	-	28	-
4111000	705412	Reg Liability - Cholla Decommissioning - UT	(2,135)	-	(2,135)	-	-	-	-	-	-
4111000	705413	Reg Liability - Cholla Decommissioning - WY	(4,819)	-	-	-	-	(4,819)	-	-	-
4111000	705414	Reg Liability - Cholla Decommissioning - OTHER	69	-	-	-	69	-	-	-	-
4111000	705420	Reg Liability - CA GHG Allowance Revenue	(268)	-	-	-	-	-	-	-	(268)
4111000	705425	Reg Liability - Bridgier Mine Accelerated	(313)	-	-	(313)	-	-	-	-	-
4111000	705450	Reg Liability - Property Insurance Reser	(32)	(32)	-	-	-	-	-	-	-
4111000	705451	Reg Liability - OR Property Insurance Re	1,959	-	1,959	-	-	-	-	-	-
4111000	705452	Reg Liability - Property Insurance Reser	(28)	-	-	(28)	-	-	-	-	-
4111000	705453	Reg Liability - ID Property Insurance Re	(28)	-	-	-	-	-	(28)	-	-
4111000	705455	Reg Liability - WY Property Insurance Re	93	-	-	-	93	-	-	-	-
4111000	705511	Regulatory Liability - CA Deferred Exces	(130)	-	-	-	-	-	-	-	(130)
4111000	705515	Regulatory Liability - OR Deferred Exces	6,082	-	-	-	-	-	-	-	6,082
4111000	705519	Regulatory Liability - WA Deferred Exces	878	-	-	-	-	-	-	-	878
4111000	705521	Regulatory Liability - WY Deferred Exces	671	-	-	-	-	-	-	-	671
4111000	705531	Regulatory Liability - UT Solar Feed-in	475	-	-	-	-	-	-	-	475
4111000	715105	MCI FOG Wire Lease	0	0	0	0	0	0	0	0	0
4111000	715720	190NW Power Act(BPA Regional Crs)-WA	(60)	-	-	-	-	-	-	-	(60)
4111000	715810	Chehalis WA EFSEC C02 Mitigation Obligat	0	0	0	0	0	0	0	0	0
4111000	720300	190Pension/Retirement (Accrued/Prepaid)	7	0	2	1	1	3	0	0	0
4111000	740100	283Post Merger Debt Loss	(143)	(3)	(37)	(11)	(19)	(66)	(8)	(0)	(0)
4111000	910245	Contra Receivable from Joint Owners	183	4	50	14	24	81	11	0	0
4111000	910905	283PMI BCC Underground Mine Cost Deplet	(307)	(4)	(77)	(23)	(47)	(137)	(20)	(0)	-
4111000	920110	190PMWY Extracton Tax	74	1	19	5	11	33	5	0	-
4111000	999998	Deferred Income Tax Expense - Solar ITC	16	0	4	1	2	7	1	0	0
<b>4111000 Total</b>			<b>(462,672)</b>	<b>(9,173)</b>	<b>(126,502)</b>	<b>(23,878)</b>	<b>(51,315)</b>	<b>(257,942)</b>	<b>(36,138)</b>	<b>(239)</b>	<b>42,513</b>
<b>Grand Total</b>			<b>(64,901)</b>	<b>(1,737)</b>	<b>(21,537)</b>	<b>(2,873)</b>	<b>466</b>	<b>(84,713)</b>	<b>(11,516)</b>	<b>(144)</b>	<b>47,723</b>



**Investment Tax Credit Amortization (Actuals)**

Sum of Range: 07/2020 - 06/2021

Allocation Method - Factor 2020 Protocol

(Allocated in Thousands)

Primary Account	Primary Account Name	Secondary Account	Secondary Account Name	Alloc	Balance	Calif	Oregon	Wash	Wyoming	Wy-PPL	Utah	Idaho	Wy-UPL	FERC	Other
4114000	DEF ITC-EL-FED-CR	0	DEF ITC CREDIT FED	DGU	(1,703)	-	-	-	(78)	-	(1,432)	(193)	(78)	(1)	-
<b>4114000 Total</b>					<b>(1,703)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(78)</b>	<b>-</b>	<b>(1,432)</b>	<b>(193)</b>	<b>(78)</b>	<b>(1)</b>	<b>-</b>
<b>Grand Total</b>					<b>(1,703)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(78)</b>	<b>-</b>	<b>(1,432)</b>	<b>(193)</b>	<b>(78)</b>	<b>(1)</b>	<b>-</b>

# **B8. PLANT IN SERVICE**



Electric Plant in Service (Actuals)  
 Year End: 06/30/21  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1010000	ELEC PLANT IN SERV	1,000	1,000	-	-	-	-	-	1,000	-
1010000	ELEC PLANT IN SERV	13,160	193	3,422	1,029	1,863	5,862	788	-	4
1010000	ELEC PLANT IN SERV	177,567	2,598	46,171	13,883	25,133	79,085	10,635	52	-
1010000	ELEC PLANT IN SERV	302,000	154	2,728	820	1,485	4,674	628	3	-
1010000	ELEC PLANT IN SERV	(32,081)	-	-	-	-	(32,081)	-	-	-
1010000	TRANSMISSION INTANGIBLE ASSETS	531	-	531	-	-	-	-	-	-
1010000	TRANSMISSION INTANGIBLE ASSETS	50,482	739	13,126	3,947	7,145	22,486	3,024	15	-
1010000	TRANSMISSION INTANGIBLE ASSETS	1,612	-	-	-	-	1,612	-	-	-
1010000	TRANSMISSION INTANGIBLE ASSETS	4,229	-	-	-	4,229	-	-	-	-
1010000	TRANSMISSION INTANGIBLE ASSETS	11,249	248	3,051	862	1,476	4,954	696	2	-
1010000	TRANSMISSION INTANGIBLE ASSETS	3,293	73	893	252	432	1,450	192	1	-
1010000	FUEL MANAGEMENT SYSTEM	4,410	97	1,196	338	578	1,942	257	1	-
1010000	AUTOMATE POLE CARD SYSTEM	13,886	306	3,767	1,064	1,822	6,115	810	3	-
1010000	DISTRIBUTION AUTOMATION PILOT PROJECT	147,487	3,457	45,706	10,094	10,739	71,233	6,257	-	-
1010000	CUSTOMER SERVICE SYSTEM (CSS)	182,742	4,025	49,569	14,002	23,973	80,480	10,655	37	-
1010000	S A P	2,705	40	211	211	363	1,205	162	1	-
1010000	PROD & TRANS PLANT	1,881	41	510	144	247	829	110	0	-
1010000	MINING PLANT	5,048	111	1,369	387	662	2,223	284	1	-
1010000	HYDRO PLANT	1,660	37	450	127	218	731	97	0	-
1010000	ENTERPRISE DATA WAREHOUSE - BI RPTG TOOL	5,877	129	1,584	450	771	2,988	343	1	-
1010000	ENTERPRISE DATA WAREHOUSE	2,908	64	789	223	381	1,281	170	1	-
1010000	FACILITY INSPECTION REPORTING SYSTEM	8,960	197	2,430	687	1,175	3,946	522	2	-
1010000	2002 GRID NET POWER COST MODELING	10,561	233	2,865	809	1,363	4,574	606	2	-
1010000	MID OFFICE IMPROVEMENT PROJECT	10,386	229	2,817	796	1,45	4,574	606	2	-
1010000	OPERATIONS MAPPING SYSTEM	1,892	42	513	145	248	833	110	0	-
1010000	POLE ATTACHMENT MGMT SYSTEM	2,416	53	665	185	317	1,064	141	0	-
1010000	SUBSTATIONCIRCUIT HISTORY OF OPERATIONS	13,242	292	3,592	1,015	1,737	5,832	772	3	-
1010000	SINGLE PERSON SCHEDULING	6,474	143	1,756	496	849	2,851	377	1	-
1010000	TIBCO SOFTWARE	1,600	23	416	125	226	703	96	0	-
1010000	TRANSMISSION WHOLESALE BILLING SYSTEM	6,597	145	1,789	505	865	2,905	385	1	-
1010000	UTILITY INTERNATIONAL FORECASTING MODEL	207	3	54	16	29	92	12	0	-
1010000	ROUGE RIVER HYDRO INTANGIBLES	51	4	13	4	23	3	3	0	-
1010000	GADSBY INTANGIBLE ASSETS	23,200	340	6,032	1,814	3,284	10,334	1,390	7	-
1010000	SWIFT 2 IMPROVEMENTS	652	10	170	51	92	291	39	0	-
1010000	NORTH UMPIQUA - SETTLEMENT AGREEMENT	117	2	31	9	17	52	7	0	-
1010000	BEAR RIVER SETTLEMENT AGREEMENT	2,629	58	713	201	345	1,158	153	1	-
1010000	VCPRO - XEROX CUST STMT FRMTR ENHANCE -	12,006	264	3,287	820	1,575	5,288	700	2	-
1010000	WEB SOFTWARE	8,774	128	2,281	686	1,242	3,908	525	3	-
1010000	IDAHO TRANSMISSION CUSTOMER-OWNED ASSETS	1,039	-	-	-	1,039	-	-	-	-
1010000	WYOMING VHF (VPC) SPECTRUM	3,357	-	-	-	-	-	3,357	-	-
1010000	IDAHO VHF (VPC) SPECTRUM	4,287	-	-	-	-	-	4,287	-	-
1010000	UTAH VHF (VPC) SPECTRUM	7,015	155	1,903	537	920	3,089	409	1	-
1010000	PRDM - FILENET P8	88,742	1,299	23,075	6,938	12,561	39,529	5,315	26	-
1010000	STEAM PLANT INTANGIBLE ASSETS	8,198	192	2,541	561	597	3,960	348	-	-
1010000	GTX VERSION 7 SOFTWARE	5,868	138	1,819	402	427	2,894	249	-	-
1010000	ITRON METER READING SOFTWARE	3,978	88	1,079	305	522	1,752	232	1	-
1010000	ArcFM Software	29,411	648	7,978	2,253	3,858	12,962	1,715	6	-
1010000	MONARCH EMSCADA	4,758	112	1,475	326	346	2,286	202	-	-
1010000	IEE - Itron Enterprise Addition	29,256	686	9,066	2,002	2,130	14,190	1,241	-	-
1010000	AMI Metering Software	3,698	81	1,003	283	485	1,629	216	1	-
1010000	Big Data & Analytics	9,590	225	2,972	656	698	4,632	407	-	-
1010000	CES - Customer Experience System	3,872	60	743	210	359	1,207	160	1	-
1010000	MAPAPPS - Mapping Systems Application	3,872	91	1,200	265	282	1,870	164	-	-
1010000	CUSTOMER CONTACTS	21,326	470	5,785	1,634	2,798	9,392	1,243	4	-
1010000	SECID - CUST SECURE WEB LOGIN	10,106	148	2,628	790	1,430	4,502	605	3	-
1010000	C&T - Energy Trading System	4,071	-	4,071	-	-	-	-	-	-
1010000	CA - CONTROL AREA SCHEDULING (TRANSM)	2,021	-	-	-	2,021	-	-	-	-
1010000	OR VHF (VPC) SPECTRUM	472	472	-	-	-	-	-	-	-
1010000	WA VHF (VPC) SPECTRUM	158	-	-	-	158	-	-	-	-
1010000	CA VHF (VPC) SPECTRUM	1,601	23	416	125	227	713	96	0	-
1010000	DISTRIBUTION INTANGIBLES	923	20	250	71	121	407	54	0	-
1010000	MISCELLANEOUS SMALL SOFTWARE PACKAGES	3,700	82	1,004	284	485	1,630	216	1	-
1010000	RMT TRADE SYSTEM	9	9	-	-	-	-	-	-	-
1010000	M365	3	3	-	-	-	-	-	-	-
1010000	MISC - MISCELLANEOUS	3	0	1	0	0	1	0	0	-
1010000	3034900	3	0	1	0	0	1	0	0	-



Electric Plant in Service (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alicot	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1010000	ELEC PLANT IN SERV	15	-	-	-	-	-	-	-	15	-
1010000	ELEC PLANT IN SERV	14	-	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	14	-	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	9	0	2	1	1	1	1	4	1	0
1010000	ELEC PLANT IN SERV	7,542	110	1,961	590	1,068	3,366	6,276	21,070	452	2
1010000	ELEC PLANT IN SERV	47,842	1,054	12,977	3,666	6,276	-	-	19	2,789	10
1010000	ELEC PLANT IN SERV	19	-	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	16	-	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	243	-	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	17,451	26	454	136	247	243	247	777	104	1
1010000	ELEC PLANT IN SERV	4,132	97	1,281	283	301	301	301	1,996	75	-
1010000	ELEC PLANT IN SERV	1,240	27	336	95	102	185	582	72	0	-
1010000	ELEC PLANT IN SERV	1,306	19	340	102	340	102	185	582	78	0
1010000	ELEC PLANT IN SERV	12,850	188	3,341	1,005	1,819	5,724	770	4	4	-
1010000	ELEC PLANT IN SERV	41,789	612	10,866	3,267	5,915	18,614	2,503	12	12	-
1010000	ELEC PLANT IN SERV	35,638	522	9,267	2,786	5,044	15,875	2,135	10	-	-
1010000	ELEC PLANT IN SERV	37	1	10	3	5	3	5	16	2	0
1010000	ELEC PLANT IN SERV	997,811	14,602	259,449	78,014	141,231	444,462	59,763	291	-	-
1010000	ELEC PLANT IN SERV	4,337,203	63,472	1,127,749	339,104	613,890	1,931,949	269,773	1,266	-	-
1010000	ELEC PLANT IN SERV	945,572	13,638	245,865	73,929	133,837	421,182	56,634	276	-	-
1010000	ELEC PLANT IN SERV	423,546	6,198	110,129	33,115	59,949	188,663	25,368	124	-	-
1010000	ELEC PLANT IN SERV	49	1	13	4	7	4	7	22	3	0
1010000	ELEC PLANT IN SERV	30,999	454	8,060	2,424	4,388	13,808	1,857	9	-	-
1010000	ELEC PLANT IN SERV	172	3	45	13	24	77	10	0	-	-
1010000	ELEC PLANT IN SERV	23,525	344	6,117	1,839	3,330	10,479	1,409	7	-	-
1010000	ELEC PLANT IN SERV	5,780	85	1,503	452	818	2,575	346	2	-	-
1010000	ELEC PLANT IN SERV	8,035	118	2,069	628	1,137	3,579	481	2	-	-
1010000	ELEC PLANT IN SERV	365	5	95	29	52	162	22	0	-	-
1010000	ELEC PLANT IN SERV	21	0	5	2	3	9	2	0	-	-
1010000	ELEC PLANT IN SERV	140	2	36	11	20	62	8	0	-	-
1010000	ELEC PLANT IN SERV	407	6	106	32	58	181	24	0	-	-
1010000	ELEC PLANT IN SERV	129	2	34	10	18	57	8	0	-	-
1010000	ELEC PLANT IN SERV	310	5	80	24	44	138	19	0	-	-
1010000	ELEC PLANT IN SERV	202	3	53	16	29	90	12	0	-	-
1010000	ELEC PLANT IN SERV	71,873	115	2,035	612	1,108	3,485	469	2	-	-
1010000	ELEC PLANT IN SERV	8,962	131	10,622	18,688	5,619	10,173	32,015	4,305	21	-
1010000	ELEC PLANT IN SERV	159,638	2,336	41,509	12,481	22,595	71,109	9,561	47	-	-
1010000	ELEC PLANT IN SERV	364	5	95	28	51	162	22	0	-	-
1010000	ELEC PLANT IN SERV	22,814	334	5,932	1,784	3,229	10,162	1,366	7	-	-
1010000	ELEC PLANT IN SERV	2,031	30	528	159	287	905	122	1	-	-
1010000	ELEC PLANT IN SERV	14,659	215	3,812	1,146	2,075	6,530	878	4	-	-
1010000	ELEC PLANT IN SERV	6,552	96	1,704	512	927	2,918	392	2	-	-
1010000	ELEC PLANT IN SERV	27,538	403	7,160	2,153	3,896	12,287	1,649	8	-	-
1010000	ELEC PLANT IN SERV	402,952	5,897	104,775	31,505	57,034	179,490	24,134	118	-	-
1010000	ELEC PLANT IN SERV	70,893	1,037	18,433	5,543	10,034	31,578	4,246	21	-	-
1010000	ELEC PLANT IN SERV	23,797	348	6,188	1,881	3,368	10,600	1,425	7	-	-
1010000	ELEC PLANT IN SERV	411	6	107	32	58	183	25	0	-	-
1010000	ELEC PLANT IN SERV	188	3	49	15	27	84	11	0	-	-
1010000	ELEC PLANT IN SERV	63	1	17	5	9	28	4	0	-	-
1010000	ELEC PLANT IN SERV	95,923	1,404	24,942	7,500	13,577	42,728	5,745	28	-	-
1010000	ELEC PLANT IN SERV	50,316	736	13,083	3,934	7,122	22,413	3,014	15	-	-
1010000	ELEC PLANT IN SERV	68,603	1,004	17,638	5,364	9,710	30,558	4,109	20	-	-
1010000	ELEC PLANT IN SERV	14,470	212	3,762	1,131	2,048	6,445	867	4	-	-
1010000	ELEC PLANT IN SERV	2,896	42	753	226	410	1,290	173	1	-	-
1010000	ELEC PLANT IN SERV	172	3	45	13	24	77	10	0	-	-
1010000	ELEC PLANT IN SERV	2,392	35	622	187	339	1,065	143	1	-	-
1010000	ELEC PLANT IN SERV	23,207	340	6,034	1,814	3,285	10,337	1,390	7	-	-
1010000	ELEC PLANT IN SERV	3,068	45	798	240	434	1,387	184	1	-	-
1010000	ELEC PLANT IN SERV	75	-	75	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	12,648	185	3,289	989	1,790	5,634	788	4	-	-
1010000	ELEC PLANT IN SERV	5,680	83	1,477	444	804	2,530	340	2	-	-
1010000	ELEC PLANT IN SERV	32,709	479	8,505	2,557	4,630	14,570	1,959	10	-	-
1010000	ELEC PLANT IN SERV	270,178	3,954	70,251	21,124	38,241	120,347	16,182	79	-	-
1010000	ELEC PLANT IN SERV	57	-	-	-	-	57	-	-	-	-
1010000	ELEC PLANT IN SERV	16,383	240	4,260	1,281	2,319	7,297	981	5	-	-







Electric Plant in Service (Actuals)  
Year End: 06/30/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1010000	ELEC PLANT IN SERV	CA	37,857	37,857	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	IDU	43,081	-	-	-	-	-	43,081	-	-
1010000	OVERHEAD CONDUCTORS & DEVICES	OR	299,985	-	299,985	-	-	-	-	-	-
1010000	OVERHEAD CONDUCTORS & DEVICES	UT	267,391	-	-	-	-	267,391	-	-	-
1010000	OVERHEAD CONDUCTORS & DEVICES	WA	84,380	-	-	84,380	-	-	-	-	-
1010000	OVERHEAD CONDUCTORS & DEVICES	WYP	111,474	-	-	-	111,474	-	-	-	-
1010000	OVERHEAD CONDUCTORS & DEVICES	WYU	14,642	-	-	-	14,642	-	-	-	-
1010000	UNDERGROUND CONDUIT	CA	18,983	18,983	-	-	-	-	-	-	-
1010000	UNDERGROUND CONDUIT	IDU	12,311	-	-	-	-	-	12,311	-	-
1010000	UNDERGROUND CONDUIT	OR	106,676	-	106,676	-	-	-	-	-	-
1010000	UNDERGROUND CONDUIT	UT	234,380	-	-	-	-	234,380	-	-	-
1010000	UNDERGROUND CONDUIT	WA	20,535	-	-	20,535	-	-	-	-	-
1010000	UNDERGROUND CONDUIT	WYP	27,977	-	-	-	27,977	-	-	-	-
1010000	UNDERGROUND CONDUIT	WYU	5,220	-	-	-	5,220	-	-	-	-
1010000	UNDERGROUND CONDUCTORS & DEVICES	CA	21,512	21,512	-	-	-	-	-	-	-
1010000	UNDERGROUND CONDUCTORS & DEVICES	IDU	32,515	-	-	-	-	-	32,515	-	-
1010000	UNDERGROUND CONDUCTORS & DEVICES	OR	208,212	-	208,212	-	-	-	-	-	-
1010000	UNDERGROUND CONDUCTORS & DEVICES	UT	629,583	-	-	-	-	629,583	-	-	-
1010000	UNDERGROUND CONDUCTORS & DEVICES	WA	33,143	-	-	33,143	-	-	-	-	-
1010000	UNDERGROUND CONDUCTORS & DEVICES	WYP	50,010	-	-	-	50,010	-	-	-	-
1010000	UNDERGROUND CONDUCTORS & DEVICES	WYU	18,990	-	-	-	18,990	-	-	-	-
1010000	LINE TRANSFORMERS	CA	57,639	57,639	-	-	-	-	-	-	-
1010000	LINE TRANSFORMERS	IDU	88,427	-	-	-	-	-	88,427	-	-
1010000	LINE TRANSFORMERS	OR	498,478	-	498,478	-	-	-	-	-	-
1010000	LINE TRANSFORMERS	UT	605,316	-	-	-	-	605,316	-	-	-
1010000	LINE TRANSFORMERS	WA	123,083	-	-	-	-	-	-	-	-
1010000	LINE TRANSFORMERS	WYP	115,424	-	-	-	115,424	-	-	-	-
1010000	LINE TRANSFORMERS	WYU	16,168	-	-	-	16,168	-	-	-	-
1010000	SERVICES - OVERHEAD	CA	11,158	11,158	-	-	-	-	-	-	-
1010000	SERVICES - OVERHEAD	IDU	9,630	-	-	-	-	-	-	9,630	-
1010000	SERVICES - OVERHEAD	OR	106,497	-	106,497	-	-	-	-	-	-
1010000	SERVICES - OVERHEAD	UT	100,210	-	-	-	-	100,210	-	-	-
1010000	SERVICES - OVERHEAD	WA	26,182	-	-	26,182	-	-	-	-	-
1010000	SERVICES - OVERHEAD	WYP	19,161	-	-	-	19,161	-	-	-	-
1010000	SERVICES - OVERHEAD	WYU	4,242	-	-	-	4,242	-	-	-	-
1010000	SERVICES - UNDERGROUND	CA	17,453	17,453	-	-	-	-	-	38,675	-
1010000	SERVICES - UNDERGROUND	IDU	38,675	-	-	-	-	-	-	-	-
1010000	SERVICES - UNDERGROUND	OR	219,245	-	219,245	-	-	-	-	-	-
1010000	SERVICES - UNDERGROUND	UT	280,355	-	-	-	-	280,355	-	-	-
1010000	SERVICES - UNDERGROUND	WA	46,974	-	-	46,974	-	-	-	-	-
1010000	SERVICES - UNDERGROUND	WYP	37,656	-	-	-	37,656	-	-	-	-
1010000	SERVICES - UNDERGROUND	WYU	12,931	-	-	-	12,931	-	-	-	-
1010000	METERS	CA	8,662	8,662	-	-	-	-	-	-	-
1010000	METERS	IDU	17,702	-	-	-	-	-	17,702	-	-
1010000	METERS	OR	97,716	-	97,716	-	-	-	-	-	-
1010000	METERS	UT	98,985	-	-	-	-	98,985	-	-	-
1010000	METERS	WA	14,451	-	-	14,451	-	-	-	-	-
1010000	METERS	WYP	14,454	-	-	-	14,454	-	-	-	-
1010000	METERS	WYU	2,703	-	-	-	2,703	-	-	-	-
1010000	INSTALL ON CUSTOMERS PREMISES	CA	281	281	-	-	-	-	-	-	-
1010000	INSTALL ON CUSTOMERS PREMISES	IDU	171	-	-	-	-	-	171	-	-
1010000	INSTALL ON CUSTOMERS PREMISES	OR	2,666	-	2,666	-	-	-	-	-	-
1010000	INSTALL ON CUSTOMERS PREMISES	UT	4,187	-	-	-	-	4,187	-	-	-
1010000	INSTALL ON CUSTOMERS PREMISES	WA	515	-	-	515	-	-	-	-	-
1010000	INSTALL ON CUSTOMERS PREMISES	WYP	829	-	-	-	829	-	-	-	-
1010000	INSTALL ON CUSTOMERS PREMISES	WYU	156	-	-	-	156	-	-	-	-
1010000	STREET LIGHTING & SIGNAL SYSTEMS	CA	788	788	-	-	-	-	-	-	-
1010000	STREET LIGHTING & SIGNAL SYSTEMS	IDU	828	-	-	-	-	-	828	-	-
1010000	STREET LIGHTING & SIGNAL SYSTEMS	OR	24,884	-	24,884	-	-	-	-	-	-
1010000	STREET LIGHTING & SIGNAL SYSTEMS	UT	21,694	-	-	-	-	21,694	-	-	-
1010000	STREET LIGHTING & SIGNAL SYSTEMS	WA	3,965	-	-	3,965	-	-	-	-	-
1010000	STREET LIGHTING & SIGNAL SYSTEMS	WYP	8,617	-	-	-	8,617	-	-	-	-
1010000	STREET LIGHTING & SIGNAL SYSTEMS	WYU	2,283	-	-	-	2,283	-	-	-	-
1010000	LAND AND LAND RIGHTS	IDU	89	-	-	-	-	-	89	-	-
1010000	LAND AND LAND RIGHTS	OR	228	-	228	-	-	-	-	-	-
1010000	LAND AND LAND RIGHTS	UT	1,327	-	-	-	-	1,327	-	-	-



**Electric Plant in Service (Actuals)**  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1010000	ELEC PLANT IN SERV	434	997	-	-	-	434	-	-	-
1010000	ELEC PLANT IN SERV	3891000	997	-	-	-	-	-	-	-
1010000	LAND OWNED IN FEE	-	-	-	-	-	-	-	-	-
1010000	LAND OWNED IN FEE	997	997	-	-	-	-	-	-	-
1010000	LAND OWNED IN FEE	350	26	350	77	82	545	48	-	-
1010000	LAND OWNED IN FEE	100	-	-	-	-	-	100	-	-
1010000	LAND OWNED IN FEE	5,887	-	5,887	-	-	-	-	-	-
1010000	LAND OWNED IN FEE	0	0	0	0	0	0	0	0	0
1010000	LAND OWNED IN FEE	7,516	166	2,039	576	966	3,310	438	2	-
1010000	LAND OWNED IN FEE	2,669	-	-	-	-	2,669	-	-	-
1010000	LAND OWNED IN FEE	1,099	-	-	1,099	-	-	-	-	-
1010000	LAND OWNED IN FEE	1,863	-	-	-	1,863	-	-	-	-
1010000	LAND OWNED IN FEE	221	-	-	-	221	-	-	-	-
1010000	LAND RIGHTS	5	-	-	-	-	-	-	5	-
1010000	LAND RIGHTS	OR	1	-	-	-	-	-	-	-
1010000	LAND RIGHTS	SG	0	0	0	0	1	0	0	0
1010000	LAND RIGHTS	SO	95	2	26	7	13	42	6	0
1010000	LAND RIGHTS	UT	84	-	-	-	84	-	-	-
1010000	LAND RIGHTS	WYP	52	-	-	-	52	-	-	-
1010000	LAND RIGHTS	WYU	22	-	-	-	22	-	-	-
1010000	STRUCTURES AND IMPROVEMENTS	3,819	3,819	-	-	-	-	-	-	-
1010000	STRUCTURES AND IMPROVEMENTS	8,208	192	2,544	562	598	3,964	348	-	-
1010000	STRUCTURES AND IMPROVEMENTS	11,784	-	-	-	-	-	11,784	-	-
1010000	STRUCTURES AND IMPROVEMENTS	35,384	-	35,384	-	-	-	-	-	-
1010000	STRUCTURES AND IMPROVEMENTS	888	12	221	65	136	386	57	0	-
1010000	STRUCTURES AND IMPROVEMENTS	12,084	177	3,142	945	1,710	5,383	724	4	-
1010000	STRUCTURES AND IMPROVEMENTS	99,576	2,193	27,010	7,630	13,063	43,854	5,806	20	-
1010000	STRUCTURES AND IMPROVEMENTS	46,007	-	-	-	-	46,007	-	-	-
1010000	STRUCTURES AND IMPROVEMENTS	11,626	-	-	11,626	-	-	-	-	-
1010000	STRUCTURES AND IMPROVEMENTS	11,620	-	-	-	11,620	-	-	-	-
1010000	STRUCTURES AND IMPROVEMENTS	4,044	-	-	-	4,044	-	-	-	-
1010000	LEASEHOLD IMPROVEMENTS-OFFICE STR	506	506	-	-	-	-	-	-	-
1010000	LEASEHOLD IMPROVEMENTS-OFFICE STR	334	-	-	-	-	-	334	-	-
1010000	LEASEHOLD IMPROVEMENTS-OFFICE STR	5,518	-	5,518	-	-	-	-	-	-
1010000	LEASEHOLD IMPROVEMENTS-OFFICE STR	1,815	40	492	139	238	789	106	0	-
1010000	LEASEHOLD IMPROVEMENTS-OFFICE STR	33	-	-	-	-	33	-	-	-
1010000	LEASEHOLD IMPROVEMENTS-OFFICE STR	2,533	-	-	2,533	-	-	-	-	-
1010000	LEASEHOLD IMPROVEMENTS-OFFICE STR	4,581	-	-	-	4,581	-	-	-	-
1010000	OFFICE FURNITURE	110	110	-	-	-	-	-	-	-
1010000	OFFICE FURNITURE	1,033	24	320	71	75	499	44	-	-
1010000	OFFICE FURNITURE	81	-	-	-	-	-	81	-	-
1010000	OFFICE FURNITURE	1,494	-	1,494	-	-	-	-	-	-
1010000	OFFICE FURNITURE	4	0	1	0	1	2	0	0	-
1010000	OFFICE FURNITURE	1,632	24	424	128	231	727	98	0	-
1010000	OFFICE FURNITURE	13,207	291	3,562	1,012	1,733	5,816	770	3	-
1010000	OFFICE FURNITURE	868	-	-	-	-	868	-	-	-
1010000	OFFICE FURNITURE	58	-	-	58	-	-	-	-	-
1010000	OFFICE FURNITURE	511	-	-	-	511	-	-	-	-
1010000	OFFICE FURNITURE	42	-	-	-	42	-	-	-	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	36	36	-	-	-	-	-	-	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	2,995	70	928	205	218	1,447	127	-	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	426	-	-	-	-	-	426	-	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	908	-	908	-	-	-	-	-	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	28	0	7	2	4	13	2	0	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	2,446	36	636	191	346	1,080	147	1	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	47,440	1,045	12,868	3,635	6,223	20,892	2,766	10	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	722	-	-	-	-	722	-	-	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	333	-	-	333	-	-	-	-	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	1,715	-	-	-	1,715	-	-	-	-
1010000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	76	0	0	0	76	0	0	-	-
1010000	OFFICE EQUIPMENT	3	-	3	-	-	-	-	-	-
1010000	OFFICE EQUIPMENT	40	1	10	3	6	18	2	0	-
1010000	OFFICE EQUIPMENT	121	3	33	9	16	53	7	0	-
1010000	OFFICE EQUIPMENT	9	-	-	-	-	9	-	-	-
1010000	OFFICE EQUIPMENT	8	-	-	-	8	-	-	-	-
1010000	1/4 TON MINI-PICKUPS AND VANS	41	41	-	-	-	-	-	-	-
1010000	1/4 TON MINI-PICKUPS AND VANS	355	-	-	-	-	-	-	-	-
1010000	1/4 TON MINI-PICKUPS AND VANS	-	-	-	-	-	-	355	-	-





Electric Plant in Service (Actuals)  
Year End: 06/30/21  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1010000	ELEC PLANT IN SERV	3930000		6,062	89	1,576	474	888	2,700	363	2
1010000	ELEC PLANT IN SERV	3930000	SG	249	5	67	19	33	109	14	0
1010000	ELEC PLANT IN SERV	3930000	UT	3,617	-	-	-	-	3,617	-	-
1010000	ELEC PLANT IN SERV	3930000	WA	705	-	-	705	-	-	-	-
1010000	ELEC PLANT IN SERV	3930000	WY	1,252	-	-	1,252	-	-	-	-
1010000	ELEC PLANT IN SERV	3930000	WY	1	-	-	-	1	-	-	-
1010000	ELEC PLANT IN SERV	3940000	CA	826	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3940000	CA	2,174	-	-	-	-	-	2,174	-
1010000	ELEC PLANT IN SERV	3940000	OR	10,915	-	10,915	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3940000	SE	126	2	31	9	19	56	8	0
1010000	ELEC PLANT IN SERV	3940000	SG	21,817	319	5,673	1,706	3,088	9,718	1,307	6
1010000	ELEC PLANT IN SERV	3940000	SO	1,960	43	532	150	257	863	114	0
1010000	ELEC PLANT IN SERV	3940000	UT	15,353	-	-	-	-	15,353	-	-
1010000	ELEC PLANT IN SERV	3940000	WA	2,649	-	-	2,649	-	-	-	-
1010000	ELEC PLANT IN SERV	3940000	WY	4,036	-	-	4,036	-	-	-	-
1010000	ELEC PLANT IN SERV	3940000	WY	380	-	-	-	380	-	-	-
1010000	ELEC PLANT IN SERV	3950000	CA	496	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3950000	OR	1,348	-	-	-	-	-	1,348	-
1010000	ELEC PLANT IN SERV	3950000	OR	9,565	-	9,565	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3950000	SE	1,343	19	335	99	206	599	86	0
1010000	ELEC PLANT IN SERV	3950000	SG	6,462	95	1,680	505	915	2,878	387	2
1010000	ELEC PLANT IN SERV	3950000	SO	4,873	107	1,322	373	639	2,146	284	1
1010000	ELEC PLANT IN SERV	3950000	UT	7,829	-	-	-	-	7,829	-	-
1010000	ELEC PLANT IN SERV	3950000	WA	1,458	-	-	1,458	-	-	-	-
1010000	ELEC PLANT IN SERV	3950000	WY	2,746	-	-	2,746	-	-	-	-
1010000	ELEC PLANT IN SERV	3950000	WY	98	-	-	98	-	-	-	-
1010000	ELEC PLANT IN SERV	3960300	CA	2,185	2,185	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3960300	CA	3,378	-	-	-	-	-	3,378	-
1010000	ELEC PLANT IN SERV	3960300	OR	14,203	-	14,203	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3960300	OR	388	6	101	30	55	173	23	0
1010000	ELEC PLANT IN SERV	3960300	SG	3,234	71	877	248	424	1,424	189	1
1010000	ELEC PLANT IN SERV	3960300	SO	12,816	-	-	-	-	12,816	-	-
1010000	ELEC PLANT IN SERV	3960300	UT	2,808	-	-	2,808	-	-	-	-
1010000	ELEC PLANT IN SERV	3960300	WA	5,378	-	-	5,378	-	-	-	-
1010000	ELEC PLANT IN SERV	3960300	WY	802	-	-	802	-	-	-	-
1010000	ELEC PLANT IN SERV	3960700	CA	74	74	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3960700	CA	561	-	-	-	-	-	561	-
1010000	ELEC PLANT IN SERV	3960700	OR	892	-	892	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3960700	SG	124	2	32	10	18	55	7	0
1010000	ELEC PLANT IN SERV	3960700	UT	798	-	-	-	-	798	-	-
1010000	ELEC PLANT IN SERV	3960700	WY	210	-	-	210	-	-	-	-
1010000	ELEC PLANT IN SERV	3960800	CA	1,848	1,848	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3960800	CA	4,498	-	-	-	-	-	4,498	-
1010000	ELEC PLANT IN SERV	3960800	OR	13,885	-	13,885	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3960800	SG	1,231	18	320	96	174	549	74	0
1010000	ELEC PLANT IN SERV	3960800	SO	16,554	34	425	120	205	690	91	0
1010000	ELEC PLANT IN SERV	3960800	UT	2,992	-	-	2,992	-	-	-	-
1010000	ELEC PLANT IN SERV	3960800	WA	6,930	-	-	-	6,930	-	-	-
1010000	ELEC PLANT IN SERV	3960800	WY	1,041	-	-	1,041	-	-	-	-
1010000	ELEC PLANT IN SERV	3961000	OR	413	-	413	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3961000	SG	3,025	44	787	237	428	1,348	181	1
1010000	ELEC PLANT IN SERV	3961000	UT	3	-	-	3	-	-	-	-
1010000	ELEC PLANT IN SERV	3961100	OR	1,217	-	1,217	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3961100	SG	34,349	503	8,931	2,686	4,862	15,300	2,057	10
1010000	ELEC PLANT IN SERV	3961100	SO	1,321	29	368	101	173	582	77	0
1010000	ELEC PLANT IN SERV	3961100	UT	1,600	-	-	-	-	1,600	-	-
1010000	ELEC PLANT IN SERV	3961100	WY	900	-	-	-	900	-	-	-
1010000	ELEC PLANT IN SERV	3961200	CA	1,848	1,848	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3961200	IDU	3,386	-	-	-	-	-	3,386	-
1010000	ELEC PLANT IN SERV	3961200	OR	10,896	-	10,896	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3961200	SG	325	5	85	25	46	145	19	0
1010000	ELEC PLANT IN SERV	3961200	SO	1,274	28	346	98	167	561	74	0
1010000	ELEC PLANT IN SERV	3961200	UT	15,898	-	-	-	-	15,898	-	-
1010000	ELEC PLANT IN SERV	3961200	WA	2,192	-	-	2,192	-	-	-	-
1010000	ELEC PLANT IN SERV	3961200	WY	4,697	-	-	4,697	-	-	-	-



Electric Plant in Service (Actuals)  
 Year End: 06/30/21  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1010000	ELEC PLANT IN SERV	1,521	1,521	-	-	-	1,521	-	-	-	-
1010000	ELEC PLANT IN SERV	720	720	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	2,062	2,062	-	-	-	-	-	2,062	-	-
1010000	ELEC PLANT IN SERV	3,346	3,346	-	3,346	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3,346	3,346	-	3,346	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	237	237	3	17	59	36	106	15	0	0
1010000	ELEC PLANT IN SERV	3,961,300	3,961,300	6,906	101	1,796	540	977	3,076	414	2
1010000	ELEC PLANT IN SERV	3,961,300	3,961,300	941	21	255	72	414	414	55	0
1010000	ELEC PLANT IN SERV	7,194	7,194	-	-	-	-	7,194	-	-	-
1010000	ELEC PLANT IN SERV	1,622	1,622	-	-	-	1,622	-	-	-	-
1010000	ELEC PLANT IN SERV	2,695	2,695	-	-	-	2,695	-	-	-	-
1010000	ELEC PLANT IN SERV	898	898	-	-	-	898	-	-	-	-
1010000	ELEC PLANT IN SERV	6,324	6,324	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	3,849	3,849	90	1,193	263	280	1,859	163	-	-
1010000	ELEC PLANT IN SERV	11,569	11,569	-	-	-	-	-	11,569	-	-
1010000	ELEC PLANT IN SERV	77,633	77,633	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	280	280	4	70	21	43	125	18	0	0
1010000	ELEC PLANT IN SERV	178,602	178,602	2,614	46,440	13,964	25,279	79,566	10,697	52	-
1010000	ELEC PLANT IN SERV	93,553	93,553	2,061	25,376	7,168	12,273	41,201	5,455	19	-
1010000	ELEC PLANT IN SERV	58,270	58,270	-	-	-	-	58,270	-	-	-
1010000	ELEC PLANT IN SERV	12,221	12,221	-	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	23,263	23,263	-	-	-	23,263	-	-	-	-
1010000	ELEC PLANT IN SERV	5,938	5,938	-	-	-	5,938	-	-	-	-
1010000	ELEC PLANT IN SERV	300	300	300	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	292	292	-	-	-	-	-	292	-	-
1010000	ELEC PLANT IN SERV	2,405	2,405	-	2,405	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	82	82	1	20	6	13	37	5	0	0
1010000	ELEC PLANT IN SERV	4,050	4,050	59	1,053	317	573	1,804	243	1	-
1010000	ELEC PLANT IN SERV	487	487	11	132	-	64	214	28	0	-
1010000	ELEC PLANT IN SERV	1,657	1,657	-	-	-	-	1,657	-	-	-
1010000	ELEC PLANT IN SERV	477	477	-	-	477	-	-	-	-	-
1010000	ELEC PLANT IN SERV	580	580	-	-	-	580	-	-	-	-
1010000	ELEC PLANT IN SERV	101	101	-	-	-	101	-	-	-	-
1010000	ELEC PLANT IN SERV	52	52	52	-	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	82	82	2	26	6	6	40	4	-	-
1010000	ELEC PLANT IN SERV	72	72	-	-	-	-	-	72	-	-
1010000	ELEC PLANT IN SERV	1,225	1,225	-	1,225	-	-	-	-	-	-
1010000	ELEC PLANT IN SERV	4	4	0	1	0	1	2	0	0	0
1010000	ELEC PLANT IN SERV	2,872	2,872	42	747	225	407	1,279	172	1	-
1010000	ELEC PLANT IN SERV	2,229	2,229	49	605	171	292	982	130	0	-
1010000	ELEC PLANT IN SERV	1,382	1,382	-	-	-	-	1,382	-	-	-
1010000	ELEC PLANT IN SERV	183	183	-	-	183	-	-	-	-	-
1010000	ELEC PLANT IN SERV	237	237	-	-	-	237	-	-	-	-
1010000	ELEC PLANT IN SERV	17	17	-	-	-	17	-	-	-	-
1010000	ELEC PLANT IN SERV	1,823	1,823	26	454	134	280	813	116	1	-
<b>1010000 Total</b>		<b>30,113,118</b>	<b>644,701</b>	<b>8,240,810</b>	<b>2,312,418</b>	<b>2,312,418</b>	<b>3,977,091</b>	<b>13,188,514</b>	<b>1,743,365</b>	<b>6,228</b>	<b>(7)</b>
1019000	ELEC PLT IN SERV-OTH	(297)	(297)	(4)	(77)	(23)	(42)	(132)	(18)	(0)	(0)
1019000	ELEC PLT IN SERV-OTH	(1,248)	(1,248)	(27)	(338)	(95)	(163)	(549)	(73)	(0)	(0)
1019000	ELEC PLT IN SERV-OTH	(19,189)	(19,189)	(281)	(4,989)	(1,500)	(2,716)	(8,547)	(1,149)	(6)	(6)
1019000	ELEC PLT IN SERV-OTH	(5,037)	(5,037)	(74)	(1,310)	(384)	(713)	(2,244)	(302)	(1)	(1)
1019000	ELEC PLT IN SERV-OTH	(381)	(381)	(381)	-	-	-	-	-	-	-
1019000	ELEC PLT IN SERV-OTH	(290)	(290)	-	-	-	-	-	-	-	-
1019000	ELEC PLT IN SERV-OTH	(2,062)	(2,062)	-	(2,062)	-	-	-	-	-	-
1019000	ELEC PLT IN SERV-OTH	(2,081)	(2,081)	-	-	-	-	(2,081)	-	-	-
1019000	ELEC PLT IN SERV-OTH	(523)	(523)	-	-	(523)	-	-	-	-	-
1019000	ELEC PLT IN SERV-OTH	(758)	(758)	-	-	-	(758)	-	-	-	-
<b>1019000 Total</b>		<b>(31,865)</b>	<b>(767)</b>	<b>(8,776)</b>	<b>(2,536)</b>	<b>(2,536)</b>	<b>(4,393)</b>	<b>(13,554)</b>	<b>(1,831)</b>	<b>(7)</b>	<b>(7)</b>
1020000	ELEC PL PUR OR SLD	(553)	(553)	(8)	(144)	(43)	(78)	(246)	(33)	(0)	(0)
1020000	ELEC PL PUR OR SLD	553	553	8	144	43	78	246	33	0	0
<b>1020000 Total</b>		<b>0</b>	<b>0</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
1061000	DIST COMP CONST NOT	4,945	4,945	-	-	-	-	-	-	-	-
1061000	DIST COMP CONST NOT	10,512	10,512	-	-	-	-	-	10,512	-	-
1061000	DIST COMP CONST NOT	41,433	41,433	-	41,433	-	-	-	-	-	-
1061000	DIST COMP CONST NOT	79,197	79,197	-	-	-	-	79,197	-	-	-
1061000	DIST COMP CONST NOT	10,662	10,662	-	-	10,662	-	-	-	-	-
1061000	DIST COMP CONST NOT	21,091	21,091	-	-	-	21,091	-	-	-	-
<b>1061000 Total</b>		<b>167,841</b>	<b>4,945</b>	<b>41,433</b>	<b>10,662</b>	<b>10,662</b>	<b>21,091</b>	<b>79,197</b>	<b>10,512</b>	<b>-</b>	<b>-</b>



Electric Plant in Service (Actuals)  
Year End: 06/30/21  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1062000	TRAN COMP CONST NOT	0								
<b>1062000 Total</b>			929,896	241,789	72,704	131,618	414,210	55,695	271	-
1063000	PROD COMP CONST NOT	0	13,608	241,789	72,704	131,618	414,210	55,695	271	-
<b>1063000 Total</b>			929,896	241,789	72,704	131,618	414,210	55,695	271	-
1064000	GEN COMP CONST NOT	0	75,860	1,110	5,931	10,737	33,791	4,544	22	-
<b>1064000 Total</b>			75,860	1,110	5,931	10,737	33,791	4,544	22	-
<b>Grand Total</b>			<b>31,377,729</b>	<b>8,552,037</b>	<b>2,403,997</b>	<b>4,144,384</b>	<b>13,729,850</b>	<b>1,815,951</b>	<b>6,527</b>	<b>-</b>

# **B9. CAPITAL LEASE PLANT**





Capital Lease (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1011000	PRPTY UND CPTL LSS			2,714	-	2,714	-	-	-	-	-
	(FINANCE LEASES-BLDGS)	OR									
1011000	3908220			2,306	51	626	177	303	1,016	134	-
	(FINANCE LEASES-BLDGS)	SO									
1011000	PRPTY UND CPTL LSS			12,159	178	3,162	951	1,721	5,416	728	-
	(FINANCE LEASES-GAS)	SG									
<b>1011000 Total</b>				<b>17,180</b>	<b>229</b>	<b>6,501</b>	<b>1,127</b>	<b>2,024</b>	<b>6,432</b>	<b>863</b>	<b>4</b>
1011500	CAP LEASES-ACCM AMRT			(1,102)	-	(1,102)	-	-	-	-	-
	(FINANCE LEASES-BLDGS)	OR									
1011500	3908220			(2,306)	(51)	(626)	(177)	(303)	(1,016)	(134)	(0)
	(FINANCE LEASES-BLDGS)	SO									
1011500	CAP LEASES-ACCM AMRT			(2,278)	(33)	(592)	(178)	(322)	(1,015)	(136)	(1)
	(FINANCE LEASES-GAS)	SG									
<b>1011500 Total</b>				<b>(5,686)</b>	<b>(84)</b>	<b>(2,320)</b>	<b>(355)</b>	<b>(625)</b>	<b>(2,030)</b>	<b>(271)</b>	<b>(1)</b>
1011900	PRPTY UND CPTL LSS-O			11,714	-	-	-	-	11,714	-	-
	FINANCE LEASE ROU ASSETS (COST) - PPAS	UT									
1011900	142785			3,146	-	3,146	-	-	-	-	-
	FIN LEASE ROU ASSETS (COST)-OTHER-TEMP	OR									
1011900	142794			4,793	70	1,246	375	678	2,135	287	1
	FIN LEASE ROU ASSETS (COST)-OTHER-TEMP	SG									
<b>1011900 Total</b>				<b>19,653</b>	<b>70</b>	<b>4,392</b>	<b>375</b>	<b>678</b>	<b>13,849</b>	<b>287</b>	<b>1</b>
1011950	CAP LEASES-ACCM AMRT			(9,158)	-	-	-	-	(9,158)	-	-
	Finance Lease ROU Assets (A/D) - PPAs	UT									
1011950	142885			(3,146)	-	(3,146)	-	-	-	-	-
	Fin Lease ROU Assets (A/D)-Other-Temp	OR									
1011950	142894			(4,793)	(70)	(1,246)	(375)	(678)	(2,135)	(287)	(1)
	Fin Lease ROU Assets (A/D)-Other-Temp	SG									
<b>1011950 Total</b>				<b>(17,097)</b>	<b>(70)</b>	<b>(4,392)</b>	<b>(375)</b>	<b>(678)</b>	<b>(11,293)</b>	<b>(287)</b>	<b>(1)</b>
<b>Grand Total</b>				<b>14,049</b>	<b>145</b>	<b>4,182</b>	<b>773</b>	<b>1,399</b>	<b>6,957</b>	<b>592</b>	<b>3</b>

# **B10.PLANT HELD FOR FUTURE USE**



**Plant Held for Future Use (Actuals)**  
 Year End: 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1050000	EL PLT HLD FTR USE	LAND OWNED IN FEE	8,923	131	2,320	698	1,263	3,975	534	3	-
1050000	EL PLT HLD FTR USE	LAND OWNED IN FEE	925	14	241	72	131	412	55	0	-
1050000	EL PLT HLD FTR USE	LAND RIGHTS	755	11	196	59	107	336	45	0	-
1050000	EL PLT HLD FTR USE	LAND OWNED IN FEE	683	683	-	-	-	-	-	-	-
1050000	EL PLT HLD FTR USE	LAND OWNED IN FEE	3,912	-	3,912	-	-	-	-	-	-
1050000	EL PLT HLD FTR USE	LAND OWNED IN FEE	5,716	-	-	-	-	5,716	-	-	-
1050000	EL PLT HLD FTR USE	LAND OWNED IN FEE	1	-	-	-	1	-	-	-	-
1050000	EL PLT HLD FTR USE	LAND OWNED IN FEE	2,981	-	2,981	-	-	-	-	-	-
<b>1050000 Total</b>			<b>23,896</b>	<b>838</b>	<b>9,651</b>	<b>829</b>	<b>1,501</b>	<b>10,439</b>	<b>635</b>	<b>3</b>	<b>-</b>
<b>Grand Total</b>			<b>23,896</b>	<b>838</b>	<b>9,651</b>	<b>829</b>	<b>1,501</b>	<b>10,439</b>	<b>635</b>	<b>3</b>	<b>-</b>

# **B11. MISC. DEFERRED DEBITS**



Deferred Debits (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1861000	MS DEF DR-OTH WIP	SE	2,347	33	585	172	360	1,046	150		
1861000	MS DEF DB-OTH WIP	SE	(2,040)	(29)	(508)	(150)	(313)	(909)	(130)	(1)	
<b>1861000 Total</b>			<b>307</b>	<b>4</b>	<b>76</b>	<b>22</b>	<b>47</b>	<b>137</b>	<b>20</b>	<b>0</b>	<b>-</b>
1861200	FINANCING COSTS DEFR	SO	1	0	0	0	0	0	0	0	0
1861200	FINANCING COSTS DEFR	SO	77	2	21	6	10	34	5	0	0
1861200	FINANCING COSTS DEFR	OTHER	1,884	-	-	-	-	-	-	-	1,884
1861200	FINANCING COSTS DEFR	OTHER	256	-	-	-	-	-	-	-	256
1861200	FINANCING COSTS DEFR	OTHER	196	-	-	-	-	-	-	-	196
<b>1861200 Total</b>			<b>2,414</b>	<b>2</b>	<b>21</b>	<b>6</b>	<b>10</b>	<b>35</b>	<b>5</b>	<b>0</b>	<b>2,335</b>
1865000	DEF COAL MINE COSTS	SE	503	7	125	37	77	224	32	0	-
<b>1865000 Total</b>			<b>503</b>	<b>7</b>	<b>125</b>	<b>37</b>	<b>77</b>	<b>224</b>	<b>32</b>	<b>0</b>	<b>-</b>
1868000	MISC DF DR-OTH-CST	OTHER	108	-	-	-	-	-	-	-	108
1868000	MISC DF DR-OTH-CST	SG	3,887	57	1,011	304	560	1,731	233	1	-
1868000	MISC DF DR-OTH-CST	SG	27	0	7	2	4	12	2	0	-
1868000	MISC DF DR-OTH-CST	SG	767	11	199	60	109	342	46	0	-
1868000	MISC DF DR-OTH-CST	SG	1,892	28	492	148	268	843	113	1	-
1868000	MISC DF DR-OTH-CST	SG	21,225	311	5,519	1,659	3,004	9,454	1,271	6	-
1868000	MISC DF DR-OTH-CST	SG	11,807	173	3,070	923	1,671	5,259	707	3	-
1868000	MISC DF DR-OTH-CST	SG	23,923	350	6,220	1,870	3,366	10,656	1,433	7	-
1868000	MISC DF DR-OTH-CST	SG	23,241	340	6,043	1,817	3,290	10,353	1,392	7	-
1868000	MISC DF DR-OTH-CST	SG	1,114	16	290	87	158	496	67	0	-
1868000	MISC DF DR-OTH-CST	SG	1,525	22	396	119	216	679	91	0	-
1868000	MISC DF DR-OTH-CST	SG	125	2	32	10	18	55	7	0	-
1868000	MISC DF DR-OTH-CST	SG	2,720	40	707	213	385	1,211	163	1	-
1868000	MISC DF DR-OTH-CST	SG	1,071	16	279	84	152	477	64	0	-
1868000	MISC DF DR-OTH-CST	SG	1,920	28	499	150	272	855	115	1	-
1868000	MISC DF DR-OTH-CST	SG	2,720	40	707	213	385	1,211	163	1	-
1868000	MISC DF DR-OTH-CST	SG	2,720	40	707	213	385	1,211	163	1	-
1868000	MISC DF DR-OTH-CST	SG	2,611	40	718	213	391	1,230	165	1	-
1868000	MISC DF DR-OTH-CST	SG	2,243	33	583	175	317	999	134	1	-
1868000	MISC DF DR-OTH-CST	SG	1,111	16	289	87	157	495	67	0	-
1868000	MISC DF DR-OTH-CST	SG	783	11	204	61	111	349	47	0	-
1868000	MISC DF DR-OTH-CST	SG	33	0	9	3	5	15	2	0	-
1868000	MISC DF DR-OTH-CST	SG	2,720	40	707	213	385	1,211	163	1	-
1868000	MISC DF DR-OTH-CST	SG	2,720	40	707	213	385	1,211	163	1	-
1868000	MISC DF DR-OTH-CST	SG	536	8	139	42	76	239	32	0	-
<b>1868000 Total</b>			<b>110,978</b>	<b>1,623</b>	<b>28,828</b>	<b>8,668</b>	<b>15,693</b>	<b>49,386</b>	<b>6,640</b>	<b>32</b>	<b>108</b>
1869000	MISC DF DR-OTH-CST	SG	2,590	38	673	202	367	1,154	155	1	-
<b>1869000 Total</b>			<b>2,590</b>	<b>38</b>	<b>673</b>	<b>202</b>	<b>367</b>	<b>1,154</b>	<b>155</b>	<b>1</b>	<b>-</b>
<b>Grand Total</b>			<b>116,791</b>	<b>1,674</b>	<b>29,724</b>	<b>8,936</b>	<b>16,194</b>	<b>50,934</b>	<b>6,852</b>	<b>33</b>	<b>2,444</b>

# **B13. MATERIALS & SUPPLIES**



**Material & Supplies (Actuals)**

Year End: 06/2021

Allocation Method - Factor 2020 Protocol

(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1511120	COAL INVNTY-HUNTER	0									
<b>1511120 Total</b>											
1511130	COAL INVNTY-HTG	0									
<b>1511130 Total</b>											
1511140	COAL INVNTY-JB	0									
<b>1511140 Total</b>											
1511160	COAL INVNTY-NAU	0									
<b>1511160 Total</b>											
1511300	COAL INVNTY-COLSTRI	0									
<b>1511300 Total</b>											
1511400	COAL INVNTY-CRAIG	0									
<b>1511400 Total</b>											
1511600	COAL INVNTY-DJ	0									
<b>1511600 Total</b>											
1511700	COAL INVNTY-RG	0									
<b>1511700 Total</b>											
1511900	COAL INVNTY-HAYDEN	0									
<b>1511900 Total</b>											
1512180	NATURAL GAS-CLAY BAS	0									
<b>1512180 Total</b>											
1514000	FUEL STK-FUEL OIL	0									
<b>1514000 Total</b>											
1514300	OIL INVNTY-COLSTRIP	0									
<b>1514300 Total</b>											
1514400	OIL INVNTY-CRAIG	0									
<b>1514400 Total</b>											
1514900	OIL INVNTY-HAYDEN	0									
<b>1514900 Total</b>											
1541000	PLNT M&S STK CNTRL	0									
1541000	PLNT M&S STK CNTRL	1510									
1541000	PLNT M&S STK CNTRL	1515									
1541000	PLNT M&S STK CNTRL	1520									
1541000	PLNT M&S STK CNTRL	1525									
1541000	PLNT M&S STK CNTRL	1530									
1541000	PLNT M&S STK CNTRL	1535									
1541000	PLNT M&S STK CNTRL	1540									
1541000	PLNT M&S STK CNTRL	1545									
1541000	PLNT M&S STK CNTRL	1550									
1541000	PLNT M&S STK CNTRL	1565									
1541000	PLNT M&S STK CNTRL	1570									
1541000	PLNT M&S STK CNTRL	1580									
1541000	PLNT M&S STK CNTRL	1675									
1541000	PLNT M&S STK CNTRL	1680									
1541000	PLNT M&S STK CNTRL	1700									
1541000	PLNT M&S STK CNTRL	1705									
1541000	PLNT M&S STK CNTRL	1715									
1541000	PLNT M&S STK CNTRL	1720									
1541000	PLNT M&S STK CNTRL	1725									
1541000	PLNT M&S STK CNTRL	1730									
1541000	PLNT M&S STK CNTRL	1735									
1541000	PLNT M&S STK CNTRL	1740									
1541000	PLNT M&S STK CNTRL	1745									
1541000	PLNT M&S STK CNTRL	1750									
1541000	PLNT M&S STK CNTRL	1760									



**Material & Supplies (Actuals)**  
 Year End: 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1541000	PLNT M&S STK CNTRL	SG	4	0	1	0	1	2	0	-
1541000	PLNT M&S STK CNTRL	Plyor Mountain								
1541000	PLNT M&S STK CNTRL	CASPER STORE ROOM	568	-	-	-	568	-	-	-
1541000	PLNT M&S STK CNTRL	BUFFALO STORE ROOM	153	-	-	-	153	-	-	-
1541000	PLNT M&S STK CNTRL	DOUGLAS STORE ROOM	238	-	-	-	238	-	-	-
1541000	PLNT M&S STK CNTRL	CODY STORE ROOM	681	-	-	-	681	-	-	-
1541000	PLNT M&S STK CNTRL	WORLAND STORE ROOM	727	-	-	-	727	-	-	-
1541000	PLNT M&S STK CNTRL	RIVERTON STORE ROOM	483	-	-	-	483	-	-	-
1541000	PLNT M&S STK CNTRL	EVANSTON STORE ROOM	815	-	-	-	815	-	-	-
1541000	PLNT M&S STK CNTRL	KEMMERER STORE ROOM	11	-	-	-	11	-	-	-
1541000	PLNT M&S STK CNTRL	PINEDALE STORE ROOM	620	-	-	-	620	-	-	-
1541000	PLNT M&S STK CNTRL	ROCK SPRINGS STORE ROOM	1,424	-	-	-	1,424	-	-	-
1541000	PLNT M&S STK CNTRL	RAWLINS STORE ROOM	511	-	-	-	511	-	-	-
1541000	PLNT M&S STK CNTRL	LARAMIE STORE ROOM	499	-	-	-	499	-	-	-
1541000	PLNT M&S STK CNTRL	REXBERG STORE ROOM	1,700	-	-	-	-	1,700	-	-
1541000	PLNT M&S STK CNTRL	SHELLY STORE ROOM	826	-	-	-	-	826	-	-
1541000	PLNT M&S STK CNTRL	PRESTON STORE ROOM	80	-	-	-	-	80	-	-
1541000	PLNT M&S STK CNTRL	LAVA HOT SPRINGS STORE ROOM	152	-	-	-	-	152	-	-
1541000	PLNT M&S STK CNTRL	MONTPELLIER STORE ROOM	254	-	-	-	-	254	-	-
1541000	PLNT M&S STK CNTRL	BRIDGERLAND STORE ROOM	493	-	-	-	-	493	-	-
1541000	PLNT M&S STK CNTRL	TRENTON STORE ROOM	398	-	-	-	-	398	-	-
1541000	PLNT M&S STK CNTRL	OGDEN STORE ROOM	1,612	-	-	-	-	1,612	-	-
1541000	PLNT M&S STK CNTRL	LAYTON STORE ROOM	1,138	-	-	-	-	1,138	-	-
1541000	PLNT M&S STK CNTRL	SALT LAKE METRO STORE ROOM	9,330	-	-	-	-	9,330	-	-
1541000	PLNT M&S STK CNTRL	JORDAN VALLEY STORE ROOM	1,036	-	-	-	-	1,036	-	-
1541000	PLNT M&S STK CNTRL	PARK CITY STORE ROOM	1,462	-	-	-	-	1,462	-	-
1541000	PLNT M&S STK CNTRL	TOOLEE STORE ROOM	567	-	-	-	-	567	-	-
1541000	PLNT M&S STK CNTRL	WASATCH RESTORATION CENTER	691	-	-	-	-	691	-	-
1541000	PLNT M&S STK CNTRL	PLNT M&S STK CNTRL EAGLE MOUNTAIN	362	-	-	-	-	362	-	-
1541000	PLNT M&S STK CNTRL	AMERICAN FORK STORE ROOM	1,796	-	-	-	-	1,796	-	-
1541000	PLNT M&S STK CNTRL	SANTAQUIN STORE ROOM	565	-	-	-	-	565	-	-
1541000	PLNT M&S STK CNTRL	DELTA STORE ROOM	528	-	-	-	-	528	-	-
1541000	PLNT M&S STK CNTRL	VERNAL STORE ROOM	744	-	-	-	-	744	-	-
1541000	PLNT M&S STK CNTRL	PRICE STORE ROOM	688	-	-	-	-	688	-	-
1541000	PLNT M&S STK CNTRL	MOAB STORE ROOM	866	-	-	-	-	866	-	-
1541000	PLNT M&S STK CNTRL	BLANDING STORE ROOM	100	-	-	-	-	100	-	-
1541000	PLNT M&S STK CNTRL	RICHFIELD STORE ROOM	124	-	-	-	-	124	-	-
1541000	PLNT M&S STK CNTRL	CEDAR CITY STORE ROOM	1,401	-	-	-	-	1,401	-	-
1541000	PLNT M&S STK CNTRL	MILFORD STORE ROOM	352	-	-	-	-	352	-	-
1541000	PLNT M&S STK CNTRL	WASHINGTON STORE ROOM	615	-	-	-	-	615	-	-
1541000	PLNT M&S STK CNTRL	WALLA WALLA STORE ROOM	2,264	-	-	-	-	2,264	-	-
1541000	PLNT M&S STK CNTRL	YAKIMA STORE ROOM	392	-	-	-	-	392	-	-
1541000	PLNT M&S STK CNTRL	ENTERPRISE STORE ROOM	233	-	-	-	-	233	-	-
1541000	PLNT M&S STK CNTRL	PENDLETON STORE ROOM	962	-	-	-	-	962	-	-
1541000	PLNT M&S STK CNTRL	HOOD RIVER STORE ROOM	523	-	-	-	-	523	-	-
1541000	PLNT M&S STK CNTRL	PORTLAND METRO - STORE ROOM	12,978	-	-	-	-	12,978	-	-
1541000	PLNT M&S STK CNTRL	ASTORIA STORE ROOM	1,311	-	-	-	-	1,311	-	-
1541000	PLNT M&S STK CNTRL	MADRAS STORE ROOM	100	-	-	-	-	100	-	-
1541000	PLNT M&S STK CNTRL	BEND STORE ROOM	2,048	-	-	-	-	2,048	-	-
1541000	PLNT M&S STK CNTRL	ALBANY STORE ROOM	249	-	-	-	-	249	-	-
1541000	PLNT M&S STK CNTRL	LINCOLN CITY STORE ROOM	219	-	-	-	-	219	-	-
1541000	PLNT M&S STK CNTRL	ROSEBURG STORE ROOM	3,572	-	-	-	-	3,572	-	-
1541000	PLNT M&S STK CNTRL	COOS BAY STORE ROOM	957	-	-	-	-	957	-	-
1541000	PLNT M&S STK CNTRL	GRANTS PASS STORE ROOM	1,388	-	-	-	-	1,388	-	-
1541000	PLNT M&S STK CNTRL	MEDFORD STORE ROOM	933	-	-	-	-	933	-	-





**Material & Supplies (Actuals)**

Year End: 06/2021

Allocation Method - Factor 2020 Protocol

(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1541000	PLNT M&S STK CNTRL	2850	KLAMATH FALLS STORE ROOM	OR	3,227	-	3,227	-	-	-	-
1541000	PLNT M&S STK CNTRL	2855	LAKEVIEW STORE ROOM	OR	128	-	128	-	-	-	-
1541000	PLNT M&S STK CNTRL	2860	ALTURAS STORE ROOM	CA	108	108	-	-	-	-	-
1541000	PLNT M&S STK CNTRL	2865	MT SHASTA STORE ROOM	CA	268	268	-	-	-	-	-
1541000	PLNT M&S STK CNTRL	2870	YREKA STORE ROOM	CA	1,605	1,605	-	-	-	-	-
1541000	PLNT M&S STK CNTRL	2875	CRESENT CITY STORE ROOM	CA	592	592	-	-	-	-	-
1541000	PLNT M&S STK CNTRL	5005	TREMONTON STORE ROOM	SO	146	3	40	11	19	64	8
1541000	PLNT M&S STK CNTRL	5110	MATERIAL PACKAGING CENTER - WEST	OR	0	-	0	-	-	-	-
1541000	PLNT M&S STK CNTRL	5115	DEMC - SLC	SNPD	150	5	40	10	14	73	8
1541000	PLNT M&S STK CNTRL	5120	DEMC - MEDFORD	OR	64	-	64	-	-	-	-
1541000	PLNT M&S STK CNTRL	5125	DEMC - OREGON	OR	10,333	-	10,333	-	-	-	-
1541000	PLNT M&S STK CNTRL	5130	MEDFORD HUB	OR	9,873	-	9,873	-	-	-	-
1541000	PLNT M&S STK CNTRL	5135	YAKIMA HUB	WA	8,275	-	-	8,275	-	-	-
1541000	PLNT M&S STK CNTRL	5140	PRESTON HUB	IDU	3,710	-	-	-	-	3,710	-
1541000	PLNT M&S STK CNTRL	5150	RICHFIELD HUB	UT	4,586	-	-	-	4,586	-	-
1541000	PLNT M&S STK CNTRL	5155	CASPER HUB	WYP	6,248	-	-	6,248	-	-	-
1541000	PLNT M&S STK CNTRL	5160	SALT LAKE METRO HUB	UT	30,718	-	-	-	30,718	-	-
1541000	PLNT M&S STK CNTRL	5200	UTAH TRANSPORTATION BUILDING	SNPD	16	1	4	1	2	8	1
1541000	PLNT M&S STK CNTRL	5300	METER TEST WAREHOUSE	UT	3	-	-	-	-	3	-
<b>1541000 Total</b>					<b>274,818</b>	<b>4,514</b>	<b>83,509</b>	<b>21,276</b>	<b>31,702</b>	<b>119,132</b>	<b>14,647</b>
1541500	OTHER M&S	0	M&S GLENROCK COAL MINE	SE	198	3	49	14	30	88	13
1541500	OTHER M&S	120001	OTHER MATERIAL & SUPPLIES - GENERAL STOC	SE	(198)	(3)	(49)	(14)	(30)	(88)	(13)
1541500	OTHER M&S	120001	OTHER MATERIAL & SUPPLIES - GENERAL STOC	SO	137	3	37	11	18	61	8
<b>1541500 Total</b>					<b>137</b>	<b>3</b>	<b>37</b>	<b>11</b>	<b>18</b>	<b>61</b>	<b>8</b>
1541900	PLNT M&S GEN JV CUT	120005	JV CUTBACK MATERIAL & SUPPLIES INVENTORY	SG	2,154	32	560	168	305	960	129
1541900	PLNT M&S GEN JV CUT	120005	JV CUTBACK MATERIAL & SUPPLIES INVENTORY	SO	(1,380)	(30)	(374)	(106)	(181)	(608)	(80)
<b>1541900 Total</b>					<b>775</b>	<b>1</b>	<b>186</b>	<b>63</b>	<b>124</b>	<b>352</b>	<b>49</b>
1549900	CR-OBSOL&SURPL INV	102930	SB Asset # 120930	SO	(27)	(1)	(7)	(2)	(4)	(12)	(2)
1549900	CR-OBSOL&SURPL INV	120930	INVENTORY RESERVE POWER SUPPLY	SG	(915)	(13)	(238)	(72)	(130)	(408)	(55)
1549900	CR-OBSOL&SURPL INV	120930	INVENTORY RESERVE POWER SUPPLY	SO	(12)	(0)	(3)	(1)	(2)	(5)	(1)
1549900	CR-OBSOL&SURPL INV	120932	Inventory Reserve - RMP (T&D)	SNPD	(894)	(32)	(237)	(57)	(86)	(435)	(48)
1549900	CR-OBSOL&SURPL INV	120933	Inventory Reserve - PP (T&D)	SNPD	(580)	(21)	(154)	(37)	(56)	(283)	(31)
<b>1549900 Total</b>					<b>(2,430)</b>	<b>(66)</b>	<b>(639)</b>	<b>(169)</b>	<b>(276)</b>	<b>(1,143)</b>	<b>(136)</b>
2531600	WORK CAP DEP-UAMPS	289920	WORKING CAPITAL DEPOSIT - UAMPS	SE	(2,806)	(39)	(699)	(206)	(431)	(1,251)	(179)
<b>2531600 Total</b>					<b>(2,806)</b>	<b>(39)</b>	<b>(699)</b>	<b>(206)</b>	<b>(431)</b>	<b>(1,251)</b>	<b>(179)</b>
2531700	WORKG CAP DEP-DG&T	289921	OTH DEF CR - WORKING CAPITAL DEPOS-DG&T	SE	(2,676)	(38)	(667)	(196)	(411)	(1,193)	(171)
<b>2531700 Total</b>					<b>(2,676)</b>	<b>(38)</b>	<b>(667)</b>	<b>(196)</b>	<b>(411)</b>	<b>(1,193)</b>	<b>(171)</b>
2531800	WCD-PROVO-PLNT M&S	289922	OTH DEF CR - WCD - PROVO - PLANT M&S	SG	(273)	(4)	(71)	(21)	(39)	(122)	(16)
<b>2531800 Total</b>					<b>(273)</b>	<b>(4)</b>	<b>(71)</b>	<b>(21)</b>	<b>(39)</b>	<b>(122)</b>	<b>(16)</b>
<b>Grand Total</b>					<b>474,499</b>	<b>7,279</b>	<b>133,229</b>	<b>35,936</b>	<b>62,441</b>	<b>208,090</b>	<b>27,418</b>

# **B14. CASH WORKING CAPITAL**



Cash Working Capital (Actuals)  
12 Month Average - 06/2022-21  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1430000	OTHER ACCTS REC	SO	0	3	0	1	0	0	1	0	0
<b>1430000 Total</b>			<b>0</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>
1431000	EMP ACCOUNTS REC	SO	4,636	586	1,258	355	586	2,042	270	0	0
<b>1431000 Total</b>			<b>4,636</b>	<b>586</b>	<b>1,258</b>	<b>355</b>	<b>586</b>	<b>2,042</b>	<b>270</b>	<b>1</b>	<b>-</b>
1431500	INC TAXES RECEIVABLE	SO	(70)	(2)	(19)	(5)	(9)	(31)	(4)	(0)	(0)
1431500	INC TAXES RECEIVABLE	SO	208	5	56	16	26	92	12	0	0
1431500	INC TAXES RECEIVABLE	SO	(28)	(23)	(8)	(2)	(3)	(12)	(2)	(0)	(0)
<b>1431500 Total</b>			<b>110</b>	<b>2</b>	<b>30</b>	<b>8</b>	<b>14</b>	<b>48</b>	<b>6</b>	<b>0</b>	<b>-</b>
1433000	JOINT OWNER REC	SO	1,331	29	361	102	168	566	78	0	0
<b>1433000 Total</b>			<b>1,331</b>	<b>29</b>	<b>361</b>	<b>102</b>	<b>168</b>	<b>566</b>	<b>78</b>	<b>0</b>	<b>-</b>
1436000	OTH ACCT REC	SO	27,753	611	7,528	2,126	3,506	12,222	1,618	6	6
<b>1436000 Total</b>			<b>27,753</b>	<b>611</b>	<b>7,528</b>	<b>2,126</b>	<b>3,506</b>	<b>12,222</b>	<b>1,618</b>	<b>6</b>	<b>-</b>
1437000	CSS OAR BILLINGS	SO	6,836	151	1,854	524	864	3,011	399	1	-
<b>1437000 Total</b>			<b>6,836</b>	<b>151</b>	<b>1,854</b>	<b>524</b>	<b>864</b>	<b>3,011</b>	<b>399</b>	<b>1</b>	<b>-</b>
1437100	CSS OAR BILLINGS-WOR	SO	(2,832)	(45)	(651)	(156)	(257)	(895)	(118)	(0)	(0)
<b>1437100 Total</b>			<b>(2,832)</b>	<b>(45)</b>	<b>(651)</b>	<b>(156)</b>	<b>(257)</b>	<b>(895)</b>	<b>(118)</b>	<b>(0)</b>	<b>-</b>
2300000	ASSET RETIREMENT OBL	OTHER	(2,978)	-	-	-	-	-	-	-	(2,978)
<b>2300000 Total</b>			<b>(2,978)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(2,978)</b>
2320000	ACCOUNTS PAYABLE	SE	(1,860)	(26)	(464)	(136)	(174)	(829)	(119)	(1)	(1)
2320000	ACCOUNTS PAYABLE	SE	(1,192)	(17)	(297)	(87)	(174)	(531)	(76)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	0	0	0	0	0	0	0	0	0
2320000	ACCOUNTS PAYABLE	SO	0	0	0	0	0	0	0	0	0
2320000	ACCOUNTS PAYABLE	SO	0	0	0	0	0	0	0	0	0
2320000	ACCOUNTS PAYABLE	SO	0	0	0	0	0	0	0	0	0
2320000	ACCOUNTS PAYABLE	SO	0	0	0	0	0	0	0	0	0
2320000	ACCOUNTS PAYABLE	SO	(10)	(9)	(3)	(1)	(1)	(5)	(1)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(530)	(12)	(144)	(41)	(67)	(233)	(31)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(1,378)	(30)	(374)	(106)	(174)	(607)	(80)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(3,163)	(70)	(858)	(242)	(400)	(1,393)	(184)	(1)	(1)
2320000	ACCOUNTS PAYABLE	SO	(41)	(11)	(11)	(3)	(5)	(18)	(2)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(37)	(1)	(10)	(3)	(5)	(16)	(2)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(3)	(0)	(1)	(0)	(0)	(1)	(0)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	0	0	0	0	0	0	0	0	0
2320000	ACCOUNTS PAYABLE	SO	2	0	1	0	0	1	0	0	0
2320000	ACCOUNTS PAYABLE	SO	(104)	(2)	(28)	(6)	(13)	(46)	(6)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(15)	(0)	(4)	(1)	(2)	(7)	(1)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(37)	(1)	(10)	(3)	(5)	(16)	(2)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	4	0	1	0	1	2	0	0	0
2320000	ACCOUNTS PAYABLE	SO	(23)	0	0	0	0	0	0	0	0
2320000	ACCOUNTS PAYABLE	SO	(23)	(1)	(6)	(2)	(3)	(10)	(1)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(5)	(0)	(1)	(0)	(1)	(2)	(0)	(0)	(0)
2320000	ACCOUNTS PAYABLE	OTHER	(19)	-	-	-	-	-	-	-	(19)
2320000	ACCOUNTS PAYABLE	SG	(3,331)	(49)	(866)	(260)	(447)	(1,484)	(200)	(1)	(1)
2320000	ACCOUNTS PAYABLE	SE	(64)	(1)	(16)	(5)	(9)	(29)	(4)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(762)	(17)	(207)	(58)	(86)	(335)	(44)	(0)	(0)
2320000	ACCOUNTS PAYABLE	SO	(54)	(1)	(15)	(4)	(7)	(24)	(3)	(0)	(0)
<b>2320000 Total</b>			<b>(12,622)</b>	<b>(228)</b>	<b>(3,313)</b>	<b>(961)</b>	<b>(1,679)</b>	<b>(5,564)</b>	<b>(757)</b>	<b>(3)</b>	<b>(19)</b>
2533000	O DEF CR-MISC PPL	SE	(7,150)	(100)	(1,782)	(524)	(1,043)	(3,187)	(457)	(2)	(2)
<b>2533000 Total</b>			<b>(7,150)</b>	<b>(100)</b>	<b>(1,782)</b>	<b>(524)</b>	<b>(1,043)</b>	<b>(3,187)</b>	<b>(457)</b>	<b>(2)</b>	<b>(2)</b>
<b>Grand Total</b>			<b>15,886</b>	<b>522</b>	<b>5,386</b>	<b>1,475</b>	<b>2,160</b>	<b>8,244</b>	<b>1,039</b>	<b>2</b>	<b>(2,997)</b>

# **B15. MISC. RATE BASE**







Miscellaneous Rate Base (Actuals)  
Year End: 06/30/21  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alicot	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
25-40000	REGULATORY LIAB	288159	8,004	8,004	-	-	-	-	-	-	8,004
25-40000	REGULATORY LIAB	288161	(781)	(781)	-	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288162	(265)	(265)	-	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288165	(2,795)	(265)	(265)	-	-	-	-	-	(2,795)
25-40000	REGULATORY LIAB	288174	(2,124)	(2,124)	-	-	-	-	-	-	(2,124)
25-40000	REGULATORY LIAB	288211	(2,350)	(2,350)	-	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288212	(457)	(457)	-	-	-	-	(457)	-	-
25-40000	REGULATORY LIAB	288214	(23,988)	-	(23,988)	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288215	(44,167)	-	(44,167)	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288232	(9,861)	-	-	-	-	-	-	-	(9,861)
25-40000	REGULATORY LIAB	288240	(1,143)	-	-	-	-	-	-	-	(1,143)
25-40000	REGULATORY LIAB	288243	537	-	-	-	-	-	-	-	537
25-40000	REGULATORY LIAB	288246	(1,814)	-	-	-	-	-	-	-	(1,814)
25-40000	REGULATORY LIAB	288248	(13,661)	-	-	-	-	-	-	-	(13,661)
25-40000	REGULATORY LIAB	288249	(656)	-	-	-	-	-	-	-	(656)
25-40000	REGULATORY LIAB	288260	1,669	-	-	-	-	-	-	-	1,669
25-40000	REGULATORY LIAB	288281	(4,084)	-	-	-	-	-	-	-	(4,084)
25-40000	REGULATORY LIAB	288283	(9,829)	-	-	-	-	-	-	-	(9,829)
25-40000	REGULATORY LIAB	288285	(9,227)	-	-	-	-	-	-	-	(9,227)
25-40000	REGULATORY LIAB	288295	1,100	-	-	-	-	-	-	-	1,100
25-40000	REGULATORY LIAB	288405	(7,587)	-	-	-	-	-	-	-	(7,587)
25-40000	REGULATORY LIAB	288406	(1,820)	-	(1,820)	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288409	(678)	-	(678)	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288410	(1,275)	-	-	(1,275)	-	-	-	-	-
25-40000	REGULATORY LIAB	288411	(43,545)	-	-	(43,545)	-	-	-	-	-
25-40000	REGULATORY LIAB	288412	(6,655)	-	-	-	-	-	-	-	(6,655)
25-40000	REGULATORY LIAB	288420	749	-	-	-	-	-	-	-	749
25-40000	REGULATORY LIAB	288422	(5,549)	-	-	-	-	-	-	-	(5,549)
25-40000	REGULATORY LIAB	288423	544	-	-	-	-	-	-	-	544
25-40000	REGULATORY LIAB	288424	(749)	-	-	-	-	-	-	-	(749)
25-40000	REGULATORY LIAB	288443	2,833	-	-	-	-	-	-	-	2,833
25-40000	REGULATORY LIAB	288444	873	-	-	-	-	-	-	-	873
25-40000	REGULATORY LIAB	288446	147	-	-	-	-	-	-	-	147
25-40000	REGULATORY LIAB	288453	(222)	-	-	-	-	-	-	-	(222)
25-40000	REGULATORY LIAB	288454	(1,946)	-	-	-	-	-	-	-	(1,946)
25-40000	REGULATORY LIAB	288456	(733)	-	-	-	-	-	-	-	(733)
25-40000	REGULATORY LIAB	288459	(639)	-	-	-	-	-	-	-	(639)
25-40000	REGULATORY LIAB	288463	5,612	-	-	-	-	-	-	-	5,612
25-40000	REGULATORY LIAB	288465	1,143	-	-	-	-	-	-	-	1,143
25-40000	REGULATORY LIAB	288466	43	-	-	-	-	-	-	-	43
25-40000	REGULATORY LIAB	288470	(4,033)	-	-	-	-	-	-	-	(4,033)
25-40000	REGULATORY LIAB	288471	(629)	-	-	-	-	-	-	-	(629)
25-40000	REGULATORY LIAB	288476	(43)	-	-	-	-	-	-	-	(43)
25-40000	REGULATORY LIAB	288484	5,075	-	-	-	-	-	-	-	5,075
25-40000	REGULATORY LIAB	288494	(19,905)	-	-	-	-	-	-	-	(19,905)
25-40000	REGULATORY LIAB	288857	4,027	-	-	-	-	-	-	-	4,027
25-40000	REGULATORY LIAB	288859	(4,027)	-	-	-	-	-	-	-	(4,027)
25-40000	REGULATORY LIAB	288931	(33,525)	-	-	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288932	(85,514)	-	-	-	-	-	(85,514)	-	-
25-40000	REGULATORY LIAB	288933	(374,952)	-	(374,952)	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288935	(90,029)	-	(90,029)	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288936	(212,743)	-	-	-	(212,743)	-	-	-	-
25-40000	REGULATORY LIAB	288939	(680,802)	-	-	-	-	(680,802)	-	-	-
25-40000	REGULATORY LIAB	288941	(2,436)	-	-	-	-	-	-	-	(2,436)
25-40000	REGULATORY LIAB	288942	(7,865)	-	-	-	-	-	-	-	(7,865)
25-40000	REGULATORY LIAB	288943	(2)	-	(2)	-	-	-	-	-	-
25-40000	REGULATORY LIAB	288944	(49,875)	-	-	-	-	-	(49,875)	-	-
25-40000	REGULATORY LIAB	288945	(14,617)	-	-	-	-	-	-	-	(14,617)
25-40000	REGULATORY LIAB	288946	(35,497)	-	-	(14,617)	-	-	-	-	(35,497)
25-40000	REGULATORY LIAB	288949	86,342	-	-	-	-	-	-	-	86,342
25-40000	REGULATORY LIAB	288955	8,216	-	-	-	-	-	-	-	8,216
<b>Grand Total</b>			<b>(1,834,604)</b>	<b>(39,411)</b>	<b>(388,497)</b>	<b>(179,495)</b>	<b>(294,142)</b>	<b>(735,211)</b>	<b>(94,431)</b>	<b>(2)</b>	<b>(103,414)</b>
<b>Grand Total</b>			<b>(2,158,808)</b>	<b>(46,761)</b>	<b>(468,883)</b>	<b>(206,495)</b>	<b>(345,182)</b>	<b>(880,439)</b>	<b>(116,743)</b>	<b>(98)</b>	<b>(94,205)</b>

# **B16. REGULATORY ASSETS**





Regulatory Assets (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1242000 PAC PWR-INT FREE LN	0										834
1242000 PAC PWR-INT FREE LN	0			7							7
<b>1242000 Total</b>				<b>841</b>							<b>834</b>
1249000 RESV UNCOLL ESC&WZ	0			(208)							(208)
1249000 RESV UNCOLL ESC&WZ	0			0				0			0
1249000 RESV UNCOLL ESC&WZ	0			(4)							(4)
<b>1249000 Total</b>				<b>(212)</b>				<b>0</b>			<b>(208)</b>
1823000 DSR REGULATORY ASSET	0			(57,048)							(57,048)
<b>1823000 Total</b>				<b>(57,048)</b>							<b>(57,048)</b>
1823700 OTH REGA-ENERGY WEST	186801	SE	69,504	976	17,320	5,098	10,664	30,983	4,439	23	-
1823700 OTH REGA-ENERGY WEST	186802	SE	1,078	15	269	79	165	480	69	0	-
1823700 OTH REGA-ENERGY WEST	186805	SE	3,960	56	987	290	608	1,765	253	1	-
1823700 OTH REGA-ENERGY WEST	186806	SE	1,614	23	402	118	248	720	103	1	-
1823700 OTH REGA-ENERGY WEST	186811	SE	9,902	139	2,468	726	1,519	4,414	632	3	-
1823700 OTH REGA-ENERGY WEST	186812	OR	399	-	399	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186815	SE	94	1	23	7	14	42	6	0	-
1823700 OTH REGA-ENERGY WEST	186816	SE	(4,699)	(66)	(1,171)	(345)	(721)	(2,095)	(300)	(2)	-
1823700 OTH REGA-ENERGY WEST	186817	CA	1,223	1,223	-	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186817	OR	(2,032)	-	(2,032)	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186817	SE	(79,015)	(1,110)	(19,691)	(5,795)	(12,124)	(35,223)	(5,046)	(27)	-
1823700 OTH REGA-ENERGY WEST	186817	UT	281	-	-	-	-	281	-	-	-
1823700 OTH REGA-ENERGY WEST	186817	WA	5,486	-	-	5,486	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186817	WYU	814	-	-	-	814	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186820	SE	6,682	94	1,665	490	1,025	2,979	427	2	-
1823700 OTH REGA-ENERGY WEST	186825	SE	4,492	63	1,119	329	689	2,002	287	2	-
1823700 OTH REGA-ENERGY WEST	186826	SE	843	12	210	62	129	376	54	0	-
1823700 OTH REGA-ENERGY WEST	186829	SE	14,598	205	3,638	1,071	(2,929)	6,507	932	5	-
1823700 OTH REGA-ENERGY WEST	186830	WYU	(2,929)	-	-	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186833	SE	1,612	23	402	118	247	718	103	1	-
1823700 OTH REGA-ENERGY WEST	186835	SE	2,770	39	690	203	425	1,235	177	1	-
1823700 OTH REGA-ENERGY WEST	186836	SE	45,112	634	11,242	3,309	6,922	20,110	2,881	15	-
1823700 OTH REGA-ENERGY WEST	186837	SE	(3,142)	(44)	(783)	(230)	(482)	(1,401)	(201)	(1)	-
1823700 OTH REGA-ENERGY WEST	186837	OTHER	(2,316)	-	-	-	-	(26,234)	-	-	(2,316)
1823700 OTH REGA-ENERGY WEST	186837	UT	(26,234)	-	-	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186837	WYU	(10,671)	-	-	-	(10,671)	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186839	SE	2,979	42	742	218	457	1,328	190	1	-
1823700 OTH REGA-ENERGY WEST	186841	CA	(1,332)	(1,332)	-	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186844	UT	(924)	-	-	-	-	(924)	-	-	-
1823700 OTH REGA-ENERGY WEST	186845	WA	(5,975)	-	-	(5,975)	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186846	WYU	(376)	-	-	-	(376)	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186851	CA	(1,260)	(1,260)	-	-	-	-	(2,482)	-	-
1823700 OTH REGA-ENERGY WEST	186852	IDU	(2,482)	-	-	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186853	OR	(9,264)	-	(9,264)	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186855	WA	(4,292)	-	(4,292)	-	-	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186860	UT	(2,314)	-	-	-	(2,314)	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186860	WYU	(107)	-	-	-	(107)	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186861	IDU	(1,519)	-	-	-	-	-	(1,519)	-	-
1823700 OTH REGA-ENERGY WEST	186861	UT	(8,931)	-	-	-	-	(8,931)	-	-	-
1823700 OTH REGA-ENERGY WEST	186862	WYU	(419)	-	-	-	(419)	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186862	UT	(7,407)	-	-	-	-	(7,407)	-	-	-
1823700 OTH REGA-ENERGY WEST	186863	WYU	(343)	-	-	-	(343)	-	-	-	-
1823700 OTH REGA-ENERGY WEST	186863	IDU	(191)	-	-	-	-	-	(191)	-	-
1823700 OTH REGA-ENERGY WEST	186870	UT	2,314	-	-	-	-	2,314	-	-	-
1823700 OTH REGA-ENERGY WEST	186870	WYP	107	-	-	-	107	-	-	-	-





**Regulatory Assets (Actuals)**  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1823910 ENVIR CST UNDR AMORT	Tacoma A St. (25% PCRP)	SO	33	1	9	3	4	15	2	0	-
1823910 ENVIR CST UNDR AMORT	Portland Harbor Service Ctr	SO	4,057	89	1,100	311	532	1,787	237	1	-
1823910 ENVIR CST UNDR AMORT	Wyodak Fuel Oil Spill	SO	75	2	20	6	10	33	4	0	-
1823910 ENVIR CST UNDR AMORT	CLINE FALLS-HYDRO	SO	38	1	10	3	5	17	2	0	-
1823910 ENVIR CST UNDR AMORT	Geneva Rock Bldg - Hunter Plant	SO	12	0	3	1	2	5	1	0	-
1823910 ENVIR CST UNDR AMORT	Alturas Service Center (CA)	SO	4	0	1	0	0	2	0	0	-
1823910 ENVIR CST UNDR AMORT	Pendleton Service Center (OR)	SO	2	0	1	0	0	1	0	0	-
1823910 ENVIR CST UNDR AMORT	Sunnyside Service Center (WA)	SO	0	0	0	0	0	0	0	0	-
1823910 ENVIR CST UNDR AMORT	D-SM Retail Minor Sites - RMP - 2012	SO	62	1	17	5	8	27	4	0	-
1823910 ENVIR CST UNDR AMORT	D-SM Retail Minor Sites - RMP - 2013	SO	147	3	40	11	19	65	9	0	-
1823910 ENVIR CST UNDR AMORT	D-SM Retail Minor Sites - RMP - 2014	SO	336	7	91	26	44	148	20	0	-
1823910 ENVIR CST UNDR AMORT	WASHINGTON NON-DEFERRED COSTS-SPPC ROCKY	WA	(87)	-	-	(87)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	WASHINGTON NON-DEFERRED COSTS-REMEDIAATIO	WA	(88)	-	-	(88)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	WASHINGTON NON-DEFERRED COSTS-REMEDIAATIO	WA	(360)	-	-	(360)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	WASHINGTON NON-DEFERRED COSTS-REMEDIAATIO	WA	(85)	-	-	(85)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Wash Non-Def Costs - SPPC - RMP - 2012	WA	(24)	-	-	(24)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Wash Non-Def Costs - SPPC - RMP - 2013	WA	(57)	-	-	(57)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Wash Non-Def Costs - SPPC - RMP - 2014	WA	(152)	-	-	(152)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	D-SM RETAIL MINOR SITES - RMP	SO	3,319	73	900	254	435	1,462	194	1	-
1823910 ENVIR CST UNDR AMORT	FREEPORT SUBSTATION	SO	54	1	15	4	7	24	3	0	-
1823910 ENVIR CST UNDR AMORT	Bors Property (OR) - 2016	SO	13	0	4	1	2	6	1	0	-
1823910 ENVIR CST UNDR AMORT	Carbon Ash Spill (UT) - 2016	SO	2,628	58	713	201	345	1,157	153	1	-
1823910 ENVIR CST UNDR AMORT	Naughton Oil Spill	SO	16	0	4	1	2	7	1	0	-
1823910 ENVIR CST UNDR AMORT	Ririe Substation	SO	8	0	2	1	1	3	0	0	-
1823910 ENVIR CST UNDR AMORT	Bridger Plant - FGD Pond 1	SO	450	10	122	34	59	198	26	0	-
1823910 ENVIR CST UNDR AMORT	Bridger Plant - FGD Pond 2	SO	21	0	6	2	3	9	1	0	-
1823910 ENVIR CST UNDR AMORT	Naughton Plant - FGD Pond 1	SO	372	8	101	29	49	164	22	0	-
1823910 ENVIR CST UNDR AMORT	Naughton Plant - FGD Pond 2	SO	691	15	187	53	91	304	40	0	-
1823910 ENVIR CST UNDR AMORT	Huntington Plant Ash Landfill	SO	229	5	62	18	30	101	13	0	-
1823910 ENVIR CST UNDR AMORT	Dave Johnston Pond 4A & 4B	SO	1,519	33	412	116	199	669	89	0	-
1823910 ENVIR CST UNDR AMORT	Colstrip Pond	SO	1,543	34	419	118	202	680	90	0	-
1823910 ENVIR CST UNDR AMORT	Cholla Ash-Flyash Pond	SO	39	1	11	3	5	17	2	0	-
1823910 ENVIR CST UNDR AMORT	Naughton South Ash Pond	SO	61	1	17	5	8	27	4	0	-
1823910 ENVIR CST UNDR AMORT	American Barrel (UT)-WA	WA	(14)	-	-	(14)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Astoria/Uncol (Downtown)-WA	WA	(48)	-	-	(48)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	ASTORIA YOUNGS BAY CLEANUP-WA	WA	(8)	-	-	(8)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Big Fork Hydro Plant (MT)-WA	WA	(9)	-	-	(9)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Bors Property (OR) - WA	WA	(1)	-	-	(1)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Bridger Coal Fuel Oil Spill - WA	WA	(22)	-	-	(22)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Bridger FGD Pond 1 Closure-WA	WA	(21)	-	-	(21)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Bridger Plant - FGD Pond 1-WA	WA	(34)	-	-	(34)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Bridger Plant - FGD Pond 2-WA	WA	(1)	-	-	(1)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Bridger Plant Oil Spills-2018	WA	(12)	-	-	(12)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Carbon Ash Spill (UT) - WA	WA	(46)	-	-	(46)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Cedar Steam - WA	WA	(0)	-	-	(0)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Colstrip Pond - WA	WA	(105)	-	-	(105)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Cholla Ash - WA	WA	(3)	-	-	(3)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	DJ Oil Spill - WA	WA	(8)	-	-	(8)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	DJ 4A&4B - WA	WA	(103)	-	-	(103)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Eugene MGP (50%PCRP) - WA	WA	(17)	-	-	(17)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Everett MGP (2/3 PCRP) - WA	WA	(0)	-	-	(0)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Hunter Plant - WA	WA	(21)	-	-	(21)	-	-	-	-	-
1823910 ENVIR CST UNDR AMORT	Huntington Ash-WA	WA	(39)	-	-	(39)	-	-	-	-	-









Regulatory Assets (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1823920 DSR COSTS AMORTIZED	102964 CALIFORNIA DSM EXPENSE - 2009	OTHER	0	0	-	-	-	-	-	-	0
1823920 DSR COSTS AMORTIZED	102976 A/C LOAD CONTROL - RESIDENTIAL/UTAH - 20	OTHER	9,817	9,817	-	-	-	-	-	-	9,817
1823920 DSR COSTS AMORTIZED	102977 AIR CONDITIONING - UTAH - 2009	OTHER	500	500	-	-	-	-	-	-	500
1823920 DSR COSTS AMORTIZED	102978 ENERGY FINANSWER - UTAH - 2009	OTHER	2,532	2,532	-	-	-	-	-	-	2,532
1823920 DSR COSTS AMORTIZED	102979 INDUSTRIAL FINANSWER - UTAH - 2009	OTHER	5,215	5,215	-	-	-	-	-	-	5,215
1823920 DSR COSTS AMORTIZED	102980 LOW INCOME - UTAH - 2009	OTHER	162	162	-	-	-	-	-	-	162
1823920 DSR COSTS AMORTIZED	102981 POWER FORWARD - UTAH - 2009	OTHER	50	50	-	-	-	-	-	-	50
1823920 DSR COSTS AMORTIZED	102982 REFRIGERATOR RECYCLING PGM- UTAH - 2009	OTHER	2,339	2,339	-	-	-	-	-	-	2,339
1823920 DSR COSTS AMORTIZED	102983 COMMERCIAL SELF-DIRECT - UTAH - 2009	OTHER	53	53	-	-	-	-	-	-	53
1823920 DSR COSTS AMORTIZED	102984 INDUSTRIAL SELF-DIRECT - UTAH - 2009	OTHER	72	72	-	-	-	-	-	-	72
1823920 DSR COSTS AMORTIZED	102985 RESIDENTIAL NEW CONSTRUCTION - UTAH - 20	OTHER	1,446	1,446	-	-	-	-	-	-	1,446
1823920 DSR COSTS AMORTIZED	102986 COMMERCIAL FINANSWER EXPRESS - UTAH - 20	OTHER	3,258	3,258	-	-	-	-	-	-	3,258
1823920 DSR COSTS AMORTIZED	102987 INDUSTRIAL FINANSWER EXPRESS - UTAH - 20	OTHER	776	776	-	-	-	-	-	-	776
1823920 DSR COSTS AMORTIZED	102988 RETROFIT COMMISSIONING PROGRAM - UTAH -	OTHER	947	947	-	-	-	-	-	-	947
1823920 DSR COSTS AMORTIZED	102990 IRRIGATION LOAD CONTROL - UTAH - 2009	OTHER	2,732	2,732	-	-	-	-	-	-	2,732
1823920 DSR COSTS AMORTIZED	102991 HOME ENERGY EFF INCENTIVE PROG - UT 2009	OTHER	25,439	25,439	-	-	-	-	-	-	25,439
1823920 DSR COSTS AMORTIZED	102992 ENERGY FINANSWER - WYOMING PPL - 2009	OTHER	21	21	-	-	-	-	-	-	21
1823920 DSR COSTS AMORTIZED	102993 INDUSTRIAL FINANSWER-WYOMING - PPL 2009	OTHER	96	96	-	-	-	-	-	-	96
1823920 DSR COSTS AMORTIZED	102995 REFRIGERATOR RECYCLING - PPL WYOMING - 2	OTHER	140	140	-	-	-	-	-	-	140
1823920 DSR COSTS AMORTIZED	102996 HOME ENERGY EFF INCENTIVE PRO - PPL WYOM	OTHER	439	439	-	-	-	-	-	-	439
1823920 DSR COSTS AMORTIZED	102997 LOW-INCOME WEATHERIZATION - WYOMING PPL	OTHER	86	86	-	-	-	-	-	-	86
1823920 DSR COSTS AMORTIZED	102998 COMMERCIAL FINANSWER EXPRESS - WY - 2009	OTHER	139	139	-	-	-	-	-	-	139
1823920 DSR COSTS AMORTIZED	102999 INDUSTRIAL FINANSWER EXPRESS - WY - 2009	OTHER	59	59	-	-	-	-	-	-	59
1823920 DSR COSTS AMORTIZED	103000 SELF DIRECT - COMMERCIAL - WY - 2009	OTHER	5	5	-	-	-	-	-	-	5
1823920 DSR COSTS AMORTIZED	103001 MAIN CHECK DISB-WIRES/ACH IN CLEAR ACCT	OTHER	12	12	-	-	-	-	-	-	12
1823920 DSR COSTS AMORTIZED	103002 MAIN CHECK DISB-WIRES/ACH OUT CLEAR ACCT	OTHER	2	2	-	-	-	-	-	-	2
1823920 DSR COSTS AMORTIZED	103004 COMMERCIAL FINANSWER EXPRESS Cat 2 - WY -	OTHER	236	236	-	-	-	-	-	-	236
1823920 DSR COSTS AMORTIZED	103006 INDUSTRIAL FINANSWER EXPRESS Cat 2 - WY -	OTHER	34	34	-	-	-	-	-	-	34
1823920 DSR COSTS AMORTIZED	103007 ENERGY FINANSWER Cat 2 - WY 2009	OTHER	40	40	-	-	-	-	-	-	40
1823920 DSR COSTS AMORTIZED	103008 INDUSTRIAL FINANSWER Cat 2 - WY 2009	OTHER	34	34	-	-	-	-	-	-	34
1823920 DSR COSTS AMORTIZED	103012 WYOMING REV RECOVERY - SBC OFFSET CAT 1	OTHER	(10,759)	(10,759)	-	-	-	-	-	-	(10,759)
1823920 DSR COSTS AMORTIZED	103013 WYOMING REV RECOVERY - SBC OFFSET CAT 2	OTHER	(10,609)	(10,609)	-	-	-	-	-	-	(10,609)
1823920 DSR COSTS AMORTIZED	103014 WYOMING REV RECOVERY - SBC OFFSET CAT 3	OTHER	(10,192)	(10,192)	-	-	-	-	-	-	(10,192)
1823920 DSR COSTS AMORTIZED	103031 OUTREACH and COMMUNICATIONS - UT 2009	OTHER	571	571	-	-	-	-	-	-	571
1823920 DSR COSTS AMORTIZED	103059 CALIFORNIA DSM EXPENSE - 2010	OTHER	0	0	-	-	-	-	-	-	0
1823920 DSR COSTS AMORTIZED	103071 A/C LOAD CONTROL - RESIDENTIAL/UTAH - 20	OTHER	4,836	4,836	-	-	-	-	-	-	4,836
1823920 DSR COSTS AMORTIZED	103072 AIR CONDITIONING - UTAH - 2010	OTHER	1,490	1,490	-	-	-	-	-	-	1,490
1823920 DSR COSTS AMORTIZED	103073 ENERGY FINANSWER - UTAH - 2010	OTHER	3,246	3,246	-	-	-	-	-	-	3,246
1823920 DSR COSTS AMORTIZED	103074 INDUSTRIAL FINANSWER - UTAH - 2010	OTHER	4,524	4,524	-	-	-	-	-	-	4,524
1823920 DSR COSTS AMORTIZED	103075 LOW INCOME - UTAH - 2010	OTHER	258	258	-	-	-	-	-	-	258
1823920 DSR COSTS AMORTIZED	103076 POWER FORWARD - UTAH # 2010	OTHER	50	50	-	-	-	-	-	-	50
1823920 DSR COSTS AMORTIZED	103077 REFRIGERATOR RECYCLING PGM- UTAH - 2010	OTHER	2,370	2,370	-	-	-	-	-	-	2,370
1823920 DSR COSTS AMORTIZED	103078 COMMERCIAL SELF-DIRECT - UTAH - 2010	OTHER	187	187	-	-	-	-	-	-	187
1823920 DSR COSTS AMORTIZED	103079 INDUSTRIAL SELF-DIRECT - UTAH - 2010	OTHER	330	330	-	-	-	-	-	-	330
1823920 DSR COSTS AMORTIZED	103080 RESIDENTIAL NEW CONSTRUCTION - UTAH - 20	OTHER	2,605	2,605	-	-	-	-	-	-	2,605
1823920 DSR COSTS AMORTIZED	103081 COMMERCIAL FINANSWER EXPRESS - UTAH - 20	OTHER	4,107	4,107	-	-	-	-	-	-	4,107
1823920 DSR COSTS AMORTIZED	103082 INDUSTRIAL FINANSWER EXPRESS - UTAH - 20	OTHER	1,019	1,019	-	-	-	-	-	-	1,019
1823920 DSR COSTS AMORTIZED	103083 RETROFIT COMMISSIONING PROGRAM - UTAH -	OTHER	986	986	-	-	-	-	-	-	986
1823920 DSR COSTS AMORTIZED	103085 IRRIGATION LOAD CONTROL - UTAH - 2010	OTHER	2,513	2,513	-	-	-	-	-	-	2,513
1823920 DSR COSTS AMORTIZED	103086 HOME ENERGY EFF INCENTIVE PROG - UT 2010	OTHER	16,876	16,876	-	-	-	-	-	-	16,876
1823920 DSR COSTS AMORTIZED	103087 OUTREACH and COMMUNICATIONS - UT 2010	OTHER	1,485	1,485	-	-	-	-	-	-	1,485
1823920 DSR COSTS AMORTIZED	103089 ENERGY FINANSWER-WY-2010 CAT3	OTHER	11	11	-	-	-	-	-	-	11
1823920 DSR COSTS AMORTIZED	103090 INDUSTRIAL FINANSWER-WY-2010 CAT3	OTHER	669	669	-	-	-	-	-	-	669









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Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1823920 DSR COSTS AMORTIZED	103646 PORTFOLIO - IDAHO 2013	OTHER	38	38	-	-	-	-	-	-	38
1823920 DSR COSTS AMORTIZED	103647 A/C LOAD CONTROL - RESIDENTIAL/UTAH - 20	OTHER	10,293	10,293	-	-	-	-	-	-	10,293
1823920 DSR COSTS AMORTIZED	103648 AIR CONDITIONING - UTAH - 2013	OTHER	66	66	-	-	-	-	-	-	66
1823920 DSR COSTS AMORTIZED	103649 INDUSTRIAL FINANSWER - UTAH - 2013	OTHER	1,445	1,445	-	-	-	-	-	-	1,445
1823920 DSR COSTS AMORTIZED	103650 ENERGY FINANSWER - UTAH - 2013	OTHER	2,168	2,168	-	-	-	-	-	-	2,168
1823920 DSR COSTS AMORTIZED	103651 LOW INCOME - UTAH - 2013	OTHER	120	120	-	-	-	-	-	-	120
1823920 DSR COSTS AMORTIZED	103653 REFRIGERATOR RECYCLING PGM- UTAH - 2013	OTHER	1,544	1,544	-	-	-	-	-	-	1,544
1823920 DSR COSTS AMORTIZED	103654 COMMERCIAL SELF-DIRECT - UTAH - 2013	OTHER	116	116	-	-	-	-	-	-	116
1823920 DSR COSTS AMORTIZED	103655 INDUSTRIAL SELF-DIRECT - UTAH - 2013	OTHER	319	319	-	-	-	-	-	-	319
1823920 DSR COSTS AMORTIZED	103656 RESIDENTIAL NEW CONSTRUCTION - UTAH - 20	OTHER	1,314	1,314	-	-	-	-	-	-	1,314
1823920 DSR COSTS AMORTIZED	103657 COMMERCIAL FINANSWER EXPRESS - UTAH - 20	OTHER	8,290	8,290	-	-	-	-	-	-	8,290
1823920 DSR COSTS AMORTIZED	103658 INDUSTRIAL FINANSWER EXPRESS - UTAH - 20	OTHER	1,444	1,444	-	-	-	-	-	-	1,444
1823920 DSR COSTS AMORTIZED	103660 IRRIGATION LOAD CONTROL - UTAH - 2013	OTHER	807	807	-	-	-	-	-	-	807
1823920 DSR COSTS AMORTIZED	103661 HOME ENERGY EFF INCENTIVE PROG - UT 2013	OTHER	20,269	20,269	-	-	-	-	-	-	20,269
1823920 DSR COSTS AMORTIZED	103662 OUTREACH and COMMUNICATIONS - UT 2013	OTHER	1,406	1,406	-	-	-	-	-	-	1,406
1823920 DSR COSTS AMORTIZED	103666 AGRICULTURAL FINANSWER EXPRESS - UTAH -	OTHER	70	70	-	-	-	-	-	-	70
1823920 DSR COSTS AMORTIZED	103671 HOME ENERGY REPORTING - UT 2013	OTHER	765	765	-	-	-	-	-	-	765
1823920 DSR COSTS AMORTIZED	103673 RETROFIT COMMISSIONING PROGRAM - UTAH -	OTHER	135	135	-	-	-	-	-	-	135
1823920 DSR COSTS AMORTIZED	103675 ENERGY FINANSWER-WY-2013 CAT3	OTHER	27	27	-	-	-	-	-	-	27
1823920 DSR COSTS AMORTIZED	103676 INDUSTRIAL FINANSWER-WY-2013 CAT3	OTHER	985	985	-	-	-	-	-	-	985
1823920 DSR COSTS AMORTIZED	103677 REFRIGERATOR RECYCLING-WY -2013 CAT1	OTHER	130	130	-	-	-	-	-	-	130
1823920 DSR COSTS AMORTIZED	103678 HOME ENERGY EFF INCENT PROG Y-2013 CAT1	OTHER	884	884	-	-	-	-	-	-	884
1823920 DSR COSTS AMORTIZED	103679 LOW-INCOME WEATHERZTN - WY 2013 CAT1	OTHER	41	41	-	-	-	-	-	-	41
1823920 DSR COSTS AMORTIZED	103680 COMMERCIAL FINANSWER EXP WY-2013 CAT3	OTHER	424	424	-	-	-	-	-	-	424
1823920 DSR COSTS AMORTIZED	103681 INDUSTRIAL FINANSWER EXP WY-2013 CAT3	OTHER	169	169	-	-	-	-	-	-	169
1823920 DSR COSTS AMORTIZED	103682 SELF DIRECT - COMMERCIAL-WY-2013 CAT3	OTHER	2	2	-	-	-	-	-	-	2
1823920 DSR COSTS AMORTIZED	103683 SELF DIRECT -INDUSTRIAL -WY-2013 CAT3	OTHER	9	9	-	-	-	-	-	-	9
1823920 DSR COSTS AMORTIZED	103684 COMMERCIAL FINANSWER EXP -WY-2013 CAT2	OTHER	1,234	1,234	-	-	-	-	-	-	1,234
1823920 DSR COSTS AMORTIZED	103685 INDUSTRIAL FINAN EXPRESS WY-2013 CAT2	OTHER	85	85	-	-	-	-	-	-	85
1823920 DSR COSTS AMORTIZED	103686 ENERGY FINANSWER -WY 2013 CAT2	OTHER	26	26	-	-	-	-	-	-	26
1823920 DSR COSTS AMORTIZED	103687 INDUSTRIAL FINANSWER -WY 2013 CAT2	OTHER	58	58	-	-	-	-	-	-	58
1823920 DSR COSTS AMORTIZED	103688 SELF DIRECT - COMMERCIAL WY-2013 CAT2	OTHER	2	2	-	-	-	-	-	-	2
1823920 DSR COSTS AMORTIZED	103689 SELF DIRECT-INDUSTRIAL WY-2013 CAT2	OTHER	8	8	-	-	-	-	-	-	8
1823920 DSR COSTS AMORTIZED	103690 PORTFOLIO WY-2013 CAT1	OTHER	130	130	-	-	-	-	-	-	130
1823920 DSR COSTS AMORTIZED	103691 OUTREACH AND COMMUNICATION WATTSMT WY-2	OTHER	178	178	-	-	-	-	-	-	178
1823920 DSR COSTS AMORTIZED	103692 AGRICULTURAL FINANSWER EXP WY-2013 CAT2	OTHER	10	10	-	-	-	-	-	-	10
1823920 DSR COSTS AMORTIZED	103693 AGRICULTURAL FINANSWER EXP WY-2013 CAT3	OTHER	0	0	-	-	-	-	-	-	0
1823920 DSR COSTS AMORTIZED	103694 PORTFOLIO WY-2013 CAT2	OTHER	38	38	-	-	-	-	-	-	38
1823920 DSR COSTS AMORTIZED	103695 PORTFOLIO WY-2013 CAT3	OTHER	26	26	-	-	-	-	-	-	26
1823920 DSR COSTS AMORTIZED	103700 PORTFOLIO - UTAH 2013	OTHER	435	435	-	-	-	-	-	-	435
1823920 DSR COSTS AMORTIZED	103701 U of Utah Student Energy Sponsorship- UT	OTHER	2	2	-	-	-	-	-	-	2
1823920 DSR COSTS AMORTIZED	103732 COMMERCIAL (WSB) WATTSMT BUSINESS - UT	OTHER	0	0	-	-	-	-	-	-	0
1823920 DSR COSTS AMORTIZED	103734 INDUSTRIAL (WSB) WATTSMT BUSINESS - UT	OTHER	0	0	-	-	-	-	-	-	0
1823920 DSR COSTS AMORTIZED	103735 WSB - WATTSMT BUSINESS - UT - 2013	OTHER	12	12	-	-	-	-	-	-	12
1823920 DSR COSTS AMORTIZED	103740 COMMERCIAL (WSB) WATTSMT BUSINESS - WA	OTHER	5,435	5,435	-	-	-	-	-	-	5,435
1823920 DSR COSTS AMORTIZED	103741 INDUSTRIAL WATTSMT BUSINESS - WA-2013	OTHER	6,233	6,233	-	-	-	-	-	-	6,233
1823920 DSR COSTS AMORTIZED	103742 WSB - WATTSMT BUSINESS - WA - 2013	OTHER	4,049	4,049	-	-	-	-	-	-	4,049
1823920 DSR COSTS AMORTIZED	103743 AGRICULTURAL (WSB) WATTSMT BUSINESS -	OTHER	306	306	-	-	-	-	-	-	306
1823920 DSR COSTS AMORTIZED	103745 CALIFORNIA DSM EXPENSE - 2014	OTHER	0	0	-	-	-	-	-	-	0
1823920 DSR COSTS AMORTIZED	103754 PORTFOLIO - IDAHO 2014	OTHER	30	30	-	-	-	-	-	-	30
1823920 DSR COSTS AMORTIZED	103756 A/C LOAD CONTROL - RESIDENTIAL/UTAH - 20	OTHER	24,564	24,564	-	-	-	-	-	-	24,564
1823920 DSR COSTS AMORTIZED	103757 AGRICULTURAL FINANSWER EXPRESS - UTAH - 2	OTHER	1	1	-	-	-	-	-	-	1
1823920 DSR COSTS AMORTIZED	103758 AIR CONDITIONING - UTAH - 2014	OTHER	1	1	-	-	-	-	-	-	1
1823920 DSR COSTS AMORTIZED	103759 COMMERCIAL FINANSWER EXPRESS - UTAH - 20	OTHER	401	401	-	-	-	-	-	-	401

















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Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1823990	OTHR REG ASSET-N CST	OTHER	218	-	-	-	-	-	-	-	218
1823990	OTHR REG ASSET-N CST	OTHER	4,635	-	-	-	-	-	-	-	4,635
1823990	OTHR REG ASSET-N CST	OTHER	1,475	-	-	-	-	-	-	-	1,475
1823990	OTHR REG ASSET-N CST	OTHER	(2,086)	-	-	-	-	-	-	-	(2,086)
1823990	OTHR REG ASSET-N CST	OTHER	2,289	-	-	-	-	-	-	-	2,289
1823990	OTHR REG ASSET-N CST	OTHER	(6,908)	-	-	-	-	-	-	-	(6,908)
1823990	OTHR REG ASSET-N CST	OTHER	(125)	-	-	-	-	-	-	-	(125)
1823990	OTHR REG ASSET-N CST	OTHER	3,068	-	-	-	-	-	-	-	3,068
1823990	OTHR REG ASSET-N CST	OTHER	(17,819)	-	-	-	-	-	-	-	(17,819)
1823990	OTHR REG ASSET-N CST	OTHER	6,173	-	-	-	-	-	-	-	6,173
1823990	OTHR REG ASSET-N CST	OTHER	19,905	-	-	-	-	-	-	-	19,905
1823990	OTHR REG ASSET-N CST	OTHER	1,940	-	-	-	-	-	-	-	1,940
1823990	OTHR REG ASSET-N CST	OTHER	1,551	-	-	-	-	-	-	-	1,551
1823990	OTHR REG ASSET-N CST	OTHER	(4,033)	-	-	-	-	-	-	-	(4,033)
1823990	OTHR REG ASSET-N CST	OTHER	(6,075)	-	-	-	-	-	-	-	(6,075)
1823990	OTHR REG ASSET-N CST	SE	(745)	(10)	(186)	(55)	(114)	(332)	(48)	(0)	-
1823990	OTHR REG ASSET-N CST	OTHER	3,675	-	-	-	-	-	-	-	3,675
1823990	OTHR REG ASSET-N CST	OTHER	(229)	-	-	-	-	-	-	-	(229)
1823990	OTHR REG ASSET-N CST	OTHER	397	-	-	-	-	-	-	-	397
1823990	OTHR REG ASSET-N CST	OTHER	(1,170)	-	-	-	-	-	-	-	(1,170)
1823990	OTHR REG ASSET-N CST	OTHER	2,169	-	-	-	-	-	-	-	2,169
1823990	OTHR REG ASSET-N CST	OTHER	(45)	-	-	-	-	-	-	-	(45)
1823990	OTHR REG ASSET-N CST	OTHER	(743)	-	-	-	-	-	-	-	(743)
1823990	OTHR REG ASSET-N CST	OTHER	(28)	-	-	-	-	-	-	-	(28)
1823990	OTHR REG ASSET-N CST	OTHER	(748)	-	-	-	-	-	-	-	(748)
1823990	OTHR REG ASSET-N CST	OTHER	(49)	-	-	-	-	-	-	-	(49)
1823990	OTHR REG ASSET-N CST	OTHER	(640)	-	-	-	-	-	-	-	(640)
1823990	OTHR REG ASSET-N CST	OTHER	(222)	-	-	-	-	-	-	-	(222)
1823990	OTHR REG ASSET-N CST	OTHER	(100)	-	-	-	-	-	-	-	(100)
1823990	OTHR REG ASSET-N CST	OTHER	222	-	-	-	-	-	-	-	222
1823990	OTHR REG ASSET-N CST	OTHER	1,946	-	-	-	-	-	-	-	1,946
1823990	OTHR REG ASSET-N CST	OTHER	733	-	-	-	-	-	-	-	733
1823990	OTHR REG ASSET-N CST	WYP	717	-	-	-	717	-	-	-	-
1823990	OTHR REG ASSET-N CST	WYP	266	-	-	-	266	-	-	-	-
1823990	OTHR REG ASSET-N CST	UT	437	-	-	-	-	437	-	-	-
1823990	OTHR REG ASSET-N CST	WYP	71	-	-	-	71	-	-	-	0
1823990	OTHR REG ASSET-N CST	OTHER	0	-	-	-	-	-	-	-	0
1823990	OTHR REG ASSET-N CST	OTHER	152	-	-	-	-	-	-	-	152
1823990	OTHR REG ASSET-N CST	OTHER	38	-	-	-	-	-	-	-	38
1823990	OTHR REG ASSET-N CST	IDU	103	-	-	-	-	-	103	-	-
1823990	OTHR REG ASSET-N CST	OTHER	639	-	-	-	-	-	-	-	639
1823990	OTHR REG ASSET-N CST	OTHER	433	-	-	-	-	-	-	-	433
1823990	OTHR REG ASSET-N CST	OTHER	2,124	-	-	-	-	-	-	-	2,124
1823990	OTHR REG ASSET-N CST	OTHER	20,938	-	-	-	-	-	-	-	20,938
1823990	OTHR REG ASSET-N CST	OTHER	(481)	-	-	-	-	-	-	-	(481)
1823990	OTHR REG ASSET-N CST	OTHER	(212)	-	-	-	-	-	-	-	(212)
1823990	OTHR REG ASSET-N CST	OTHER	3	-	-	-	-	-	-	-	3
1823990	OTHR REG ASSET-N CST	OTHER	14,852	-	-	-	-	-	-	-	14,852
1823990	OTHR REG ASSET-N CST	OTHER	(900)	-	-	-	-	-	-	-	(900)
1823990	OTHR REG ASSET-N CST	OTHER	3,157	-	-	-	-	-	-	-	3,157
1823990	OTHR REG ASSET-N CST	OTHER	1,840	-	-	-	-	-	-	-	1,840
1823990	OTHR REG ASSET-N CST	OTHER	(134)	-	-	-	-	-	-	-	(134)
1823990	OTHR REG ASSET-N CST	OTHER	(841)	-	-	-	-	-	-	-	(841)



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Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other	
1823990	OTHR REG ASSET-N CST	189503		(45)	-	-	-	-	-	-	(45)	
1823990	OTHR REG ASSET-N CST	189504		(80)	-	-	-	-	-	-	(80)	
1823990	OTHR REG ASSET-N CST	189505		(9)	-	-	-	-	-	-	(9)	
1823990	OTHR REG ASSET-N CST	189506		2	-	-	-	-	-	-	2	
1823990	OTHR REG ASSET-N CST	189507		(0)	-	-	-	-	-	-	(0)	
1823990	OTHR REG ASSET-N CST	189528		(569)	-	-	-	-	-	-	(569)	
1823990	OTHR REG ASSET-N CST	189529		529	-	-	-	-	-	-	529	
1823990	OTHR REG ASSET-N CST	189535		8,216	-	-	-	-	-	-	8,216	
1823990	OTHR REG ASSET-N CST	189536		13,513	-	-	-	-	-	-	13,513	
1823990	OTHR REG ASSET-N CST	189537		12	-	-	-	-	-	-	12	
1823990	OTHR REG ASSET-N CST	189546		(676)	-	-	-	-	-	-	(676)	
1823990	OTHR REG ASSET-N CST	189547		(1)	-	-	-	-	-	-	(1)	
1823990	OTHR REG ASSET-N CST	189568		(9,286)	-	-	-	-	-	-	(9,286)	
1823990	OTHR REG ASSET-N CST	189571		800	-	-	-	-	-	-	800	
1823990	OTHR REG ASSET-N CST	189572		47	-	-	-	-	-	-	47	
1823990	OTHR REG ASSET-N CST	189582		(2)	-	-	-	-	-	-	(2)	
1823990	OTHR REG ASSET-N CST	189598		(822)	-	-	-	-	-	-	(822)	
1823990	OTHR REG ASSET-N CST	189609		28,286	-	-	-	-	-	-	28,286	
1823990	OTHR REG ASSET-N CST	189610		1,871	-	-	-	-	-	-	1,871	
1823990	OTHR REG ASSET-N CST	189611		48,902	-	-	-	-	-	-	48,902	
1823990	OTHR REG ASSET-N CST	189612		86	-	-	-	-	-	-	86	
1823990	OTHR REG ASSET-N CST	189620		(93)	-	-	-	-	-	-	(93)	
1823990	OTHR REG ASSET-N CST	189621		(2,696)	-	-	-	-	-	-	(2,696)	
1823990	OTHR REG ASSET-N CST	189622		(4)	-	-	-	-	-	-	(4)	
1823990	OTHR REG ASSET-N CST	189638		(28,730)	-	-	-	-	-	-	(28,730)	
1823990	OTHR REG ASSET-N CST	189642		259	-	-	-	-	-	-	259	
1823990	OTHR REG ASSET-N CST	189650		(2,277)	-	-	-	-	-	-	(2,277)	
1823990	OTHR REG ASSET-N CST	189651		7,905	-	-	-	-	-	-	7,905	
1823990	OTHR REG ASSET-N CST	189652		23	-	-	-	-	-	-	23	
1823990	OTHR REG ASSET-N CST	189660		121	-	-	-	-	-	-	121	
1823990	OTHR REG ASSET-N CST	189661		339	-	-	-	-	-	-	339	
1823990	OTHR REG ASSET-N CST	189662		(1)	-	-	-	-	-	-	(1)	
1823990	OTHR REG ASSET-N CST	189689		43	-	-	-	-	-	-	43	
<b>1823990 Total</b>				<b>229,448</b>	<b>(971)</b>	<b>807</b>	<b>529</b>	<b>18,564</b>	<b>5,680</b>	<b>6,562</b>	<b>1</b>	<b>198,277</b>
1823999	REGULATORY ASST-OTH	186011		224	-	-	-	-	-	-	224	
1823999	REGULATORY ASST-OTH	186015		(207)	-	-	-	-	-	-	(207)	
1823999	REGULATORY ASST-OTH	186021		242	-	-	-	-	-	-	242	
1823999	REGULATORY ASST-OTH	186025		(238)	-	-	-	-	-	-	(238)	
1823999	REGULATORY ASST-OTH	186035		266	-	-	-	-	-	-	266	
1823999	REGULATORY ASST-OTH	186041		3,110	-	-	-	-	-	-	3,110	
1823999	REGULATORY ASST-OTH	186045		(11,086)	-	-	-	-	-	-	(11,086)	
1823999	REGULATORY ASST-OTH	186051		761	-	-	-	-	-	-	761	
1823999	REGULATORY ASST-OTH	186055		(4,787)	-	-	-	-	-	-	(4,787)	
1823999	REGULATORY ASST-OTH	186061		331	-	-	-	-	-	-	331	
1823999	REGULATORY ASST-OTH	186065		(2,521)	-	-	-	-	-	-	(2,521)	
1823999	REGULATORY ASST-OTH	186071		136	-	-	-	-	-	-	136	
1823999	REGULATORY ASST-OTH	186075		325	-	-	-	-	-	-	325	
1823999	REGULATORY ASST-OTH	186081		62	-	-	-	-	-	-	62	
1823999	REGULATORY ASST-OTH	186085		(4,763)	-	-	-	-	-	-	(4,763)	
<b>1823999 Total</b>				<b>(18,143)</b>								<b>(18,143)</b>
<b>Grand Total</b>				<b>1,045,178</b>	<b>14,864</b>	<b>163,462</b>	<b>42,457</b>	<b>136,040</b>	<b>264,514</b>	<b>41,009</b>	<b>162</b>	<b>382,670</b>

# **B17.DEPRECIATION RESERVE**



Depreciation Reserve (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other	
1080000	AC PR DPR EL PL SR 3102000	LAND RIGHTS	SG	(27,448)	(402)	(7,137)	(2,146)	(3,885)	(12,226)	(1,644)	(8)	-
1080000	AC PR DPR EL PL SR 3103000	WATER RIGHTS	SG	(14,473)	(212)	(3,763)	(1,132)	(2,049)	(6,447)	(867)	(4)	-
1080000	AC PR DPR EL PL SR 3110000	STRUCTURES AND IMPROVEMENTS	SG	(555,552)	(8,130)	(144,453)	(43,436)	(78,633)	(247,463)	(33,274)	(162)	-
1080000	AC PR DPR EL PL SR 3120000	BOILER PLANT EQUIPMENT	SG	(2,082,185)	(30,471)	(541,405)	(162,796)	(294,714)	(927,482)	(124,711)	(608)	-
1080000	AC PR DPR EL PL SR 3140000	TURBOGENERATOR UNITS	SG	(456,755)	(6,684)	(118,764)	(35,711)	(64,649)	(203,455)	(27,357)	(133)	-
1080000	AC PR DPR EL PL SR 3150000	ACCESSORY ELECTRIC EQUIPMENT	SG	(237,785)	(3,480)	(61,828)	(18,591)	(33,656)	(105,918)	(14,242)	(69)	-
1080000	AC PR DPR EL PL SR 3157000	ACCESSORY ELECTRIC EQUIP-SUPV & ALARM	SG	(33)	(0)	(9)	(3)	(5)	(15)	(2)	(0)	-
1080000	AC PR DPR EL PL SR 3160000	MISCELLANEOUS POWER PLANT EQUIPMENT	SG	(15,280)	(224)	(3,973)	(1,195)	(2,163)	(6,806)	(915)	(4)	-
1080000	AC PR DPR EL PL SR 3302000	LAND RIGHTS	SG-P	(4,037)	(59)	(1,050)	(316)	(571)	(1,798)	(242)	(1)	-
1080000	AC PR DPR EL PL SR 3302000	LAND RIGHTS	SG-U	(139)	(2)	(36)	(11)	(20)	(62)	(8)	(0)	-
1080000	AC PR DPR EL PL SR 3303000	WATER RIGHTS	SG-P	(1)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	-
1080000	AC PR DPR EL PL SR 3303000	WATER RIGHTS	SG-U	(102)	(1)	(26)	(8)	(14)	(45)	(6)	(0)	-
1080000	AC PR DPR EL PL SR 3304000	FLOOD RIGHTS	SG-P	(285)	(4)	(74)	(22)	(40)	(127)	(17)	(0)	-
1080000	AC PR DPR EL PL SR 3304000	FLOOD RIGHTS	SG-U	(93)	(1)	(24)	(7)	(13)	(41)	(6)	(0)	-
1080000	AC PR DPR EL PL SR 3305000	LAND RIGHTS - FISH/WILDLIFE	SG-P	(155)	(2)	(40)	(12)	(22)	(69)	(9)	(0)	-
1080000	AC PR DPR EL PL SR 3310000	STRUCTURES AND IMPROVE	SG-P	(29)	(0)	(8)	(2)	(4)	(13)	(2)	(0)	-
1080000	AC PR DPR EL PL SR 3310000	STRUCTURES AND IMPROVE	SG-U	(5,564)	(81)	(1,447)	(435)	(788)	(2,478)	(333)	(2)	-
1080000	AC PR DPR EL PL SR 3311000	STRUCTURES AND IMPROVE-PRODUCTION	SG-P	(33,764)	(494)	(8,779)	(2,640)	(4,779)	(15,040)	(2,022)	(10)	-
1080000	AC PR DPR EL PL SR 3311000	STRUCTURES AND IMPROVE-PRODUCTION	SG-U	(2,521)	(37)	(655)	(197)	(357)	(1,123)	(151)	(1)	-
1080000	AC PR DPR EL PL SR 3312000	STRUCTURES AND IMPROVE-FISH/WILDLIFE	SG-P	(34,182)	(500)	(8,888)	(2,673)	(4,838)	(15,226)	(2,047)	(10)	-
1080000	AC PR DPR EL PL SR 3312000	STRUCTURES AND IMPROVE-FISH/WILDLIFE	SG-U	(243)	(4)	(63)	(19)	(34)	(108)	(15)	(0)	-
1080000	AC PR DPR EL PL SR 3313000	STRUCTURES AND IMPROVE-RECREATION	SG-P	(7,653)	(112)	(1,990)	(598)	(1,083)	(3,409)	(458)	(2)	-
1080000	AC PR DPR EL PL SR 3313000	STRUCTURES AND IMPROVE-RECREATION	SG-U	(1,208)	(18)	(314)	(94)	(171)	(538)	(72)	(0)	-
1080000	AC PR DPR EL PL SR 3320000	"RESERVOIRS, DAMS & WATERWAYS"	SG-P	(1,648)	(24)	(429)	(129)	(233)	(734)	(99)	(0)	-
1080000	AC PR DPR EL PL SR 3320000	"RESERVOIRS, DAMS & WATERWAYS"	SG-U	(18,728)	(274)	(4,870)	(1,464)	(2,651)	(8,342)	(1,122)	(5)	-
1080000	AC PR DPR EL PL SR 3321000	"RESERVOIRS, DAMS, & WTRWYS-PRODUCTION"	SG-P	(200,863)	(2,939)	(52,228)	(15,704)	(28,430)	(89,472)	(12,030)	(59)	-
1080000	AC PR DPR EL PL SR 3321000	"RESERVOIRS, DAMS, & WTRWYS-PRODUCTION"	SG-U	(33,978)	(497)	(8,835)	(2,657)	(4,809)	(15,135)	(2,035)	(10)	-
1080000	AC PR DPR EL PL SR 3322000	"RESERVOIRS, DAMS, & WTRWYS-FISH/WILDLIF	SG-P	(10,146)	(148)	(2,638)	(793)	(1,436)	(4,519)	(608)	(3)	-
1080000	AC PR DPR EL PL SR 3322000	"RESERVOIRS, DAMS, & WTRWYS-FISH/WILDLIF	SG-U	(302)	(4)	(79)	(24)	(43)	(135)	(18)	(0)	-
1080000	AC PR DPR EL PL SR 3323000	"RESERVOIRS, DAMS, & WTRWYS-RECREATION"	SG-P	(76)	(1)	(20)	(6)	(11)	(34)	(5)	(0)	-
1080000	AC PR DPR EL PL SR 3323000	"RESERVOIRS, DAMS, & WTRWYS-RECREATION"	SG-U	(51)	(1)	(13)	(4)	(7)	(23)	(3)	(0)	-
1080000	AC PR DPR EL PL SR 3330000	"WATER WHEELS, TURB & GENERATORS"	SG-P	(53,190)	(778)	(13,830)	(4,159)	(7,529)	(23,693)	(3,186)	(16)	-
1080000	AC PR DPR EL PL SR 3330000	"WATER WHEELS, TURB & GENERATORS"	SG-U	(21,932)	(321)	(5,703)	(1,715)	(3,104)	(9,769)	(1,314)	(6)	-
1080000	AC PR DPR EL PL SR 3340000	ACCESSORY ELECTRIC EQUIPMENT	SG-P	(35,244)	(516)	(9,164)	(2,756)	(4,988)	(15,699)	(2,111)	(10)	-
1080000	AC PR DPR EL PL SR 3340000	ACCESSORY ELECTRIC EQUIPMENT	SG-U	(7,354)	(108)	(1,912)	(575)	(1,041)	(3,276)	(440)	(2)	-
1080000	AC PR DPR EL PL SR 3347000	ACCESSORY ELECT EQUIP - SUPV & ALARM	SG-P	(2,765)	(40)	(719)	(216)	(391)	(1,232)	(166)	(1)	-
1080000	AC PR DPR EL PL SR 3347000	ACCESSORY ELECT EQUIP - SUPV & ALARM	SG-U	(15)	(0)	(4)	(1)	(2)	(7)	(1)	(0)	-
1080000	AC PR DPR EL PL SR 3350000	MISC POWER PLANT EQUIP	SG-U	(122)	(2)	(32)	(10)	(17)	(54)	(7)	(0)	-
1080000	AC PR DPR EL PL SR 3351000	MISC POWER PLANT EQUIP - PRODUCTION	SG-P	(1,419)	(21)	(369)	(111)	(201)	(632)	(85)	(0)	-
1080000	AC PR DPR EL PL SR 3360000	"ROADS, RAILROADS & BRIDGES"	SG-P	(10,459)	(153)	(2,720)	(818)	(1,480)	(4,659)	(626)	(3)	-
1080000	AC PR DPR EL PL SR 3360000	"ROADS, RAILROADS & BRIDGES"	SG-U	(1,242)	(18)	(323)	(97)	(176)	(553)	(74)	(0)	-
1080000	AC PR DPR EL PL SR 3402000	LAND RIGHTS	SG	11,909	174	3,097	931	1,686	5,305	713	3	-
1080000	AC PR DPR EL PL SR 3403000	WATER RIGHTS - OTHER PRODUCTION	SG	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	-
1080000	AC PR DPR EL PL SR 3410000	STRUCTURES & IMPROVEMENTS	SG	(17,540)	(257)	(4,561)	(1,371)	(2,483)	(7,813)	(1,051)	(5)	-
1080000	AC PR DPR EL PL SR 3410000	STRUCTURES & IMPROVEMENTS	UT	(1)	-	-	-	-	(1)	-	-	-
1080000	AC PR DPR EL PL SR 3420000	"FUEL HOLDERS, PRODUCERS, ACCES"	SG	(4,332)	(63)	(1,126)	(339)	(613)	(1,930)	(259)	(1)	-
1080000	AC PR DPR EL PL SR 3430000	PRIME MOVERS	SG	(15,985)	(234)	(4,156)	(1,250)	(2,262)	(7,120)	(957)	(5)	-
1080000	AC PR DPR EL PL SR 3440000	GENERATORS	SG	(93,142)	(1,363)	(24,219)	(7,282)	(13,183)	(41,489)	(5,579)	(27)	-
1080000	AC PR DPR EL PL SR 3440000	GENERATORS	UT	(3)	-	-	-	-	(3)	-	-	-
1080000	AC PR DPR EL PL SR 3450000	ACCESSORY ELECTRIC EQUIPMENT	SG	(4,174)	(61)	(1,085)	(326)	(591)	(1,859)	(250)	(1)	-
1080000	AC PR DPR EL PL SR 3450000	ACCESSORY ELECTRIC EQUIPMENT	UT	(1)	-	-	-	-	(1)	-	-	-
1080000	AC PR DPR EL PL SR 3460000	MISCELLANEOUS PWR PLANT EQUIP	SG	(1,856)	(27)	(483)	(145)	(263)	(827)	(111)	(1)	-
1080000	AC PR DPR EL PL SR 3502000	LAND RIGHTS	SG	(46,952)	(687)	(12,208)	(3,671)	(6,646)	(20,914)	(2,812)	(14)	-
1080000	AC PR DPR EL PL SR 3520000	STRUCTURES & IMPROVEMENTS	SG	(56,525)	(827)	(14,698)	(4,419)	(8,001)	(25,178)	(3,386)	(16)	-
1080000	AC PR DPR EL PL SR 3530000	STATION EQUIPMENT	SG	(525,132)	(7,685)	(136,544)	(41,057)	(74,328)	(233,913)	(31,452)	(153)	-
1080000	AC PR DPR EL PL SR 3534000	STATION EQUIPMENT, STEP-UP TRANSFORMERS	SG	(42,709)	(625)	(11,105)	(3,339)	(6,045)	(19,024)	(2,558)	(12)	-
1080000	AC PR DPR EL PL SR 3537000	STATION EQUIPMENT-SUPERVISORY & ALARM	SG	(6,424)	(94)	(1,670)	(502)	(909)	(2,862)	(385)	(2)	-
1080000	AC PR DPR EL PL SR 3540000	TOWERS AND FIXTURES	SG	(382,998)	(5,605)	(99,586)	(29,945)	(54,210)	(170,601)	(22,939)	(112)	-
1080000	AC PR DPR EL PL SR 3550000	POLES AND FIXTURES	SG	(420,047)	(6,147)	(109,220)	(32,841)	(59,454)	(187,104)	(25,158)	(123)	-
1080000	AC PR DPR EL PL SR 3560000	OVERHEAD CONDUCTORS & DEVICES	SG	(515,770)	(7,548)	(134,109)	(40,325)	(73,002)	(229,743)	(30,892)	(150)	-
1080000	AC PR DPR EL PL SR 3570000	UNDERGROUND CONDUIT	SG	(1,356)	(20)	(353)	(106)	(192)	(604)	(81)	(0)	-
1080000	AC PR DPR EL PL SR 3580000	UNDERGROUND CONDUCTORS & DEVICES	SG	(3,312)	(48)	(861)	(259)	(469)	(1,475)	(198)	(1)	-
1080000	AC PR DPR EL PL SR 3590000	ROADS AND TRAILS	SG	(5,205)	(76)	(1,353)	(407)	(737)	(2,318)	(312)	(2)	-
1080000	AC PR DPR EL PL SR 3602000	LAND RIGHTS	CA	(798)	(798)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR 3602000	LAND RIGHTS	IDU	(516)	-	-	-	-	(516)	-	-	-
1080000	AC PR DPR EL PL SR 3602000	LAND RIGHTS	OR	(2,431)	-	(2,431)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR 3602000	LAND RIGHTS	UT	(3,241)	-	-	-	-	(3,241)	-	-	-
1080000	AC PR DPR EL PL SR 3602000	LAND RIGHTS	WA	(200)	-	-	(200)	-	-	-	-	-
1080000	AC PR DPR EL PL SR 3602000	LAND RIGHTS	WYP	(1,509)	-	-	-	(1,509)	-	-	-	-
1080000	AC PR DPR EL PL SR 3602000	LAND RIGHTS	WYU	(1,336)	-	-	-	(1,336)	-	-	-	-
1080000	AC PR DPR EL PL SR 3610000	STRUCTURES & IMPROVEMENTS	CA	(1,649)	(1,649)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR 3610000	STRUCTURES & IMPROVEMENTS	IDU	(868)	-	-	-	-	(868)	-	-	-
1080000	AC PR DPR EL PL SR 3610000	STRUCTURES & IMPROVEMENTS	OR	(9,016)	-	(9,016)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR 3610000	STRUCTURES & IMPROVEMENTS	UT	(15,363)	-	-	-	-	(15,363)	-	-	-



Depreciation Reserve (Actuals)  
 Year End: 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1080000	AC PR DPR EL PL SR	3610000	WA	(1,365)	-	-	(1,365)	-	-	-	-
1080000	AC PR DPR EL PL SR	3610000	WYP	(4,089)	-	-	-	(4,089)	-	-	-
1080000	AC PR DPR EL PL SR	3610000	WYU	(822)	-	-	-	(822)	-	-	-
1080000	AC PR DPR EL PL SR	3620000	CA	(10,809)	(10,809)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3620000	IDU	(11,795)	-	-	-	-	(11,795)	-	-
1080000	AC PR DPR EL PL SR	3620000	OR	(99,689)	-	(99,689)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3620000	UT	(152,205)	-	-	-	(152,205)	-	-	-
1080000	AC PR DPR EL PL SR	3620000	WA	(26,771)	-	-	(26,771)	-	-	-	-
1080000	AC PR DPR EL PL SR	3620000	WYP	(43,628)	-	-	-	(43,628)	-	-	-
1080000	AC PR DPR EL PL SR	3620000	WYU	(4,086)	-	-	-	(4,086)	-	-	-
1080000	AC PR DPR EL PL SR	3627000	CA	(128)	(128)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3627000	IDU	(159)	-	-	-	-	(159)	-	-
1080000	AC PR DPR EL PL SR	3627000	OR	(1,462)	-	(1,462)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3627000	UT	(2,019)	-	-	-	(2,019)	-	-	-
1080000	AC PR DPR EL PL SR	3627000	WA	(454)	-	-	(454)	-	-	-	-
1080000	AC PR DPR EL PL SR	3627000	WYP	(803)	-	-	-	(803)	-	-	-
1080000	AC PR DPR EL PL SR	3627000	WYU	(32)	-	-	-	(32)	-	-	-
1080000	AC PR DPR EL PL SR	3640000	CA	(43,172)	(43,172)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3640000	IDU	(47,851)	-	-	-	-	(47,851)	-	-
1080000	AC PR DPR EL PL SR	3640000	OR	(255,299)	-	(255,299)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3640000	UT	(166,924)	-	-	-	(166,924)	-	-	-
1080000	AC PR DPR EL PL SR	3640000	WA	(75,631)	-	-	(75,631)	-	-	-	-
1080000	AC PR DPR EL PL SR	3640000	WYP	(71,674)	-	-	-	(71,674)	-	-	-
1080000	AC PR DPR EL PL SR	3640000	WYU	(15,885)	-	-	-	(15,885)	-	-	-
1080000	AC PR DPR EL PL SR	3650000	CA	(22,535)	(22,535)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3650000	IDU	(16,623)	-	-	-	-	(16,623)	-	-
1080000	AC PR DPR EL PL SR	3650000	OR	(138,404)	-	(138,404)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3650000	UT	(85,064)	-	-	-	(85,064)	-	-	-
1080000	AC PR DPR EL PL SR	3650000	WA	(37,212)	-	-	(37,212)	-	-	-	-
1080000	AC PR DPR EL PL SR	3650000	WYP	(43,458)	-	-	-	(43,458)	-	-	-
1080000	AC PR DPR EL PL SR	3650000	WYU	(5,879)	-	-	-	(5,879)	-	-	-
1080000	AC PR DPR EL PL SR	3660000	CA	(13,101)	(13,101)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3660000	IDU	(4,630)	-	-	-	-	(4,630)	-	-
1080000	AC PR DPR EL PL SR	3660000	OR	(48,957)	-	(48,957)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3660000	UT	(87,498)	-	-	-	(87,498)	-	-	-
1080000	AC PR DPR EL PL SR	3660000	WA	(11,065)	-	-	(11,065)	-	-	-	-
1080000	AC PR DPR EL PL SR	3660000	WYP	(11,112)	-	-	-	(11,112)	-	-	-
1080000	AC PR DPR EL PL SR	3660000	WYU	(3,067)	-	-	-	(3,067)	-	-	-
1080000	AC PR DPR EL PL SR	3670000	CA	(13,608)	(13,608)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3670000	IDU	(12,873)	-	-	-	-	(12,873)	-	-
1080000	AC PR DPR EL PL SR	3670000	OR	(96,546)	-	(96,546)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3670000	UT	(205,056)	-	-	-	(205,056)	-	-	-
1080000	AC PR DPR EL PL SR	3670000	WA	(13,563)	-	-	(13,563)	-	-	-	-
1080000	AC PR DPR EL PL SR	3670000	WYP	(24,753)	-	-	-	(24,753)	-	-	-
1080000	AC PR DPR EL PL SR	3670000	WYU	(14,118)	-	-	-	(14,118)	-	-	-
1080000	AC PR DPR EL PL SR	3680000	CA	(30,499)	(30,499)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3680000	IDU	(33,737)	-	-	-	-	(33,737)	-	-
1080000	AC PR DPR EL PL SR	3680000	OR	(252,938)	-	(252,938)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3680000	UT	(166,991)	-	-	-	(166,991)	-	-	-
1080000	AC PR DPR EL PL SR	3680000	WA	(64,804)	-	-	(64,804)	-	-	-	-
1080000	AC PR DPR EL PL SR	3680000	WYP	(48,198)	-	-	-	(48,198)	-	-	-
1080000	AC PR DPR EL PL SR	3680000	WYU	(7,651)	-	-	-	(7,651)	-	-	-
1080000	AC PR DPR EL PL SR	3691000	CA	(4,273)	(4,273)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3691000	IDU	(4,818)	-	-	-	-	(4,818)	-	-
1080000	AC PR DPR EL PL SR	3691000	OR	(46,488)	-	(46,488)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3691000	UT	(40,295)	-	-	-	(40,295)	-	-	-
1080000	AC PR DPR EL PL SR	3691000	WA	(9,716)	-	-	(9,716)	-	-	-	-
1080000	AC PR DPR EL PL SR	3691000	WYP	(7,400)	-	-	-	(7,400)	-	-	-
1080000	AC PR DPR EL PL SR	3691000	WYU	(1,198)	-	-	-	(1,198)	-	-	-
1080000	AC PR DPR EL PL SR	3692000	CA	(9,134)	(9,134)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3692000	IDU	(13,861)	-	-	-	-	(13,861)	-	-
1080000	AC PR DPR EL PL SR	3692000	OR	(99,435)	-	(99,435)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3692000	UT	(76,250)	-	-	-	(76,250)	-	-	-
1080000	AC PR DPR EL PL SR	3692000	WA	(23,183)	-	-	(23,183)	-	-	-	-
1080000	AC PR DPR EL PL SR	3692000	WYP	(20,337)	-	-	-	(20,337)	-	-	-
1080000	AC PR DPR EL PL SR	3692000	WYU	(5,794)	-	-	-	(5,794)	-	-	-
1080000	AC PR DPR EL PL SR	3700000	CA	(721)	(721)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3700000	IDU	(10,964)	-	-	-	-	(10,964)	-	-
1080000	AC PR DPR EL PL SR	3700000	OR	(22,472)	-	(22,472)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3700000	UT	(55,963)	-	-	-	(55,963)	-	-	-
1080000	AC PR DPR EL PL SR	3700000	WA	(8,063)	-	-	(8,063)	-	-	-	-
1080000	AC PR DPR EL PL SR	3700000	WYP	(8,024)	-	-	-	(8,024)	-	-	-
1080000	AC PR DPR EL PL SR	3700000	WYU	(1,639)	-	-	-	(1,639)	-	-	-
1080000	AC PR DPR EL PL SR	3710000	CA	(259)	(259)	-	-	-	-	-	-



Depreciation Reserve (Actuals)

Year End: 06/2021

Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1080000	AC PR DPR EL PL SR	3710000	INSTALL ON CUSTOMERS PREMISES	IDU	(126)	-	-	-	(126)	-	-
1080000	AC PR DPR EL PL SR	3710000	INSTALL ON CUSTOMERS PREMISES	OR	(2,126)	(2,126)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3710000	INSTALL ON CUSTOMERS PREMISES	UT	(3,333)	-	-	-	(3,333)	-	-
1080000	AC PR DPR EL PL SR	3710000	INSTALL ON CUSTOMERS PREMISES	WA	(424)	-	(424)	-	-	-	-
1080000	AC PR DPR EL PL SR	3710000	INSTALL ON CUSTOMERS PREMISES	WYP	(814)	-	-	(814)	-	-	-
1080000	AC PR DPR EL PL SR	3710000	INSTALL ON CUSTOMERS PREMISES	WYU	(138)	-	-	(138)	-	-	-
1080000	AC PR DPR EL PL SR	3730000	STREET LIGHTING & SIGNAL SYSTEMS	CA	(403)	(403)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3730000	STREET LIGHTING & SIGNAL SYSTEMS	IDU	(461)	-	-	-	(461)	-	-
1080000	AC PR DPR EL PL SR	3730000	STREET LIGHTING & SIGNAL SYSTEMS	OR	(12,787)	(12,787)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3730000	STREET LIGHTING & SIGNAL SYSTEMS	UT	(13,606)	-	-	-	(13,606)	-	-
1080000	AC PR DPR EL PL SR	3730000	STREET LIGHTING & SIGNAL SYSTEMS	WA	(1,751)	-	(1,751)	-	-	-	-
1080000	AC PR DPR EL PL SR	3730000	STREET LIGHTING & SIGNAL SYSTEMS	WYP	(3,966)	-	-	(3,966)	-	-	-
1080000	AC PR DPR EL PL SR	3730000	STREET LIGHTING & SIGNAL SYSTEMS	WYU	(1,262)	-	-	(1,262)	-	-	-
1080000	AC PR DPR EL PL SR	3892000	LAND RIGHTS	IDU	(3)	-	-	-	(3)	-	-
1080000	AC PR DPR EL PL SR	3892000	LAND RIGHTS	OR	(0)	(0)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3892000	LAND RIGHTS	SG	(0)	(0)	(0)	(0)	(0)	(0)	(0)
1080000	AC PR DPR EL PL SR	3892000	LAND RIGHTS	SO	(4)	(0)	(1)	(0)	(1)	(2)	(0)
1080000	AC PR DPR EL PL SR	3892000	LAND RIGHTS	UT	(21)	-	-	-	(21)	-	-
1080000	AC PR DPR EL PL SR	3892000	LAND RIGHTS	WYP	(11)	-	-	(11)	-	-	-
1080000	AC PR DPR EL PL SR	3892000	LAND RIGHTS	WYU	(5)	-	-	(5)	-	-	-
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	CA	(843)	(843)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	CN	(2,471)	(58)	(766)	(169)	(180)	(1,194)	(105)
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	IDU	(5,094)	-	-	-	-	(5,094)	-
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	OR	(10,943)	-	(10,943)	-	-	-	-
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	SE	(238)	(3)	(59)	(17)	(37)	(106)	(15)
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	SG	(2,959)	(43)	(769)	(231)	(419)	(1,318)	(177)
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	SO	(31,737)	(699)	(8,609)	(2,432)	(4,163)	(13,977)	(1,850)
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	UT	(13,305)	-	-	-	(13,305)	-	-
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	WA	(7,870)	-	(7,870)	-	-	-	-
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	WYP	(1,780)	-	-	(1,780)	-	-	-
1080000	AC PR DPR EL PL SR	3900000	STRUCTURES AND IMPROVEMENTS	WYU	(1,498)	-	-	(1,498)	-	-	-
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	CA	(92)	(92)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	CN	(863)	(20)	(267)	(59)	(63)	(417)	(37)
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	IDU	(26)	-	-	-	-	(26)	-
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	OR	(1,081)	-	(1,081)	-	-	-	-
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	SE	(2)	(0)	(1)	(0)	(0)	(1)	(0)
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	SG	(824)	(12)	(214)	(64)	(117)	(367)	(49)
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	SO	(6,911)	(152)	(1,875)	(530)	(907)	(3,044)	(403)
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	UT	(338)	-	-	-	(338)	-	-
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	WA	(40)	-	(40)	-	-	-	-
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	WYP	(256)	-	-	(256)	-	-	-
1080000	AC PR DPR EL PL SR	3910000	OFFICE FURNITURE	WYU	(15)	-	-	(15)	-	-	-
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	CA	(23)	(23)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	CN	(1,891)	(44)	(586)	(129)	(138)	(913)	(80)
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	IDU	(203)	-	-	-	-	(203)	-
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	OR	(464)	-	(464)	-	-	-	-
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	SE	(10)	(0)	(2)	(1)	(1)	(4)	(1)
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	SG	(1,119)	(16)	(291)	(88)	(158)	(499)	(67)
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	SO	(24,033)	(529)	(6,519)	(1,841)	(3,153)	(10,584)	(1,401)
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	UT	(239)	-	-	-	(239)	-	-
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	WA	(185)	-	(185)	-	-	-	-
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	WYP	(942)	-	-	(942)	-	-	-
1080000	AC PR DPR EL PL SR	3912000	COMPUTER EQUIPMENT - PERSONAL COMPUTERS	WYU	(17)	-	-	(17)	-	-	-
1080000	AC PR DPR EL PL SR	3913000	OFFICE EQUIPMENT	CN	(0)	(0)	(0)	(0)	(0)	(0)	(0)
1080000	AC PR DPR EL PL SR	3913000	OFFICE EQUIPMENT	OR	(2)	-	(2)	-	-	-	-
1080000	AC PR DPR EL PL SR	3913000	OFFICE EQUIPMENT	SG	(25)	(0)	(7)	(2)	(4)	(11)	(2)
1080000	AC PR DPR EL PL SR	3913000	OFFICE EQUIPMENT	SO	(56)	(1)	(15)	(4)	(7)	(25)	(3)
1080000	AC PR DPR EL PL SR	3913000	OFFICE EQUIPMENT	UT	(4)	-	-	-	(4)	-	-
1080000	AC PR DPR EL PL SR	3913000	OFFICE EQUIPMENT	WYU	(4)	-	-	(4)	-	-	-
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	CA	(33)	(33)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	IDU	(161)	-	-	-	(161)	-	-
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	OR	(807)	-	(807)	-	-	-	-
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	SE	(18)	(0)	(4)	(1)	(3)	(8)	(1)
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	SG	(318)	(5)	(83)	(25)	(45)	(142)	(19)
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	SO	(455)	(10)	(123)	(35)	(60)	(201)	(27)
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	UT	(1,412)	-	-	-	(1,412)	-	-
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	WA	(147)	-	(147)	-	-	-	-
1080000	AC PR DPR EL PL SR	3920100	1/4 TON MINI-PICKUPS AND VANS	WYP	(259)	-	-	(259)	-	-	-
1080000	AC PR DPR EL PL SR	3920200	MID AND FULL SIZE AUTOMOBILES	OR	(52)	-	(52)	-	-	-	-
1080000	AC PR DPR EL PL SR	3920200	MID AND FULL SIZE AUTOMOBILES	SO	(47)	(1)	(13)	(4)	(6)	(21)	(3)
1080000	AC PR DPR EL PL SR	3920200	MID AND FULL SIZE AUTOMOBILES	UT	(198)	-	-	-	(198)	-	-
1080000	AC PR DPR EL PL SR	3920200	MID AND FULL SIZE AUTOMOBILES	WA	(5)	-	(5)	-	-	-	-
1080000	AC PR DPR EL PL SR	3920200	MID AND FULL SIZE AUTOMOBILES	WYP	(14)	-	-	(14)	-	-	-
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	CA	(197)	(197)	-	-	-	-	-



Depreciation Reserve (Actuals)  
 Year End: 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	IDU	(849)	-	-	-	-	(849)	-
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	OR	(2,795)	-	(2,795)	-	-	-	-
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	SE	(48)	(1)	(12)	(3)	(7)	(21)	(3)
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	SG	(4,464)	(65)	(1,161)	(349)	(632)	(1,989)	(267)
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	SO	(718)	(16)	(195)	(55)	(94)	(316)	(42)
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	UT	(4,562)	-	-	-	-	(4,562)	-
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	WA	(958)	-	-	(958)	-	-	-
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	WYP	(751)	-	-	-	(751)	-	-
1080000	AC PR DPR EL PL SR	3920400	1/2 & 3/4 TON PICKUPS, VANS, SERV TRUCK	WYU	(217)	-	-	-	(217)	-	-
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	CA	(409)	(409)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	IDU	(1,389)	-	-	-	-	(1,389)	-
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	OR	(7,766)	-	(7,766)	-	-	-	-
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	SE	(155)	(2)	(39)	(11)	(24)	(69)	(10)
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	SG	(3,604)	(53)	(937)	(282)	(510)	(1,605)	(216)
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	SO	(201)	(4)	(54)	(15)	(26)	(88)	(12)
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	UT	(9,098)	-	-	-	-	(9,098)	-
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	WA	(1,754)	-	-	(1,754)	-	-	-
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	WYP	(1,732)	-	-	-	(1,732)	-	-
1080000	AC PR DPR EL PL SR	3920500	1 TON AND ABOVE, TWO-AXLE TRUCKS	WYU	(413)	-	-	-	(413)	-	-
1080000	AC PR DPR EL PL SR	3920600	DUMP TRUCKS	OR	(117)	-	(117)	-	-	-	-
1080000	AC PR DPR EL PL SR	3920600	DUMP TRUCKS	SE	(3)	(0)	(1)	(0)	(0)	(1)	(0)
1080000	AC PR DPR EL PL SR	3920600	DUMP TRUCKS	SG	(2,117)	(31)	(650)	(165)	(300)	(943)	(127)
1080000	AC PR DPR EL PL SR	3920600	DUMP TRUCKS	UT	(107)	-	-	-	-	(107)	-
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	CA	(201)	(201)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	IDU	(404)	-	-	-	-	(404)	-
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	OR	(1,553)	-	(1,553)	-	-	-	-
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	SE	(30)	(0)	(7)	(2)	(5)	(13)	(2)
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	SG	(723)	(11)	(188)	(57)	(102)	(322)	(43)
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	SO	(315)	(7)	(86)	(24)	(41)	(139)	(18)
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	UT	(3,129)	-	-	-	-	(3,129)	-
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	WA	(366)	-	-	(366)	-	-	-
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	WYP	(1,161)	-	-	-	(1,161)	-	-
1080000	AC PR DPR EL PL SR	3920900	TRAILERS	WYU	(234)	-	-	-	(234)	-	-
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	CA	(61)	(61)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	IDU	(43)	-	-	-	-	(43)	-
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	OR	(225)	-	(225)	-	-	-	-
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	SE	(4)	(0)	(1)	(0)	(1)	(2)	(0)
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	SG	(410)	(6)	(107)	(32)	(58)	(183)	(25)
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	SO	(34)	(1)	(9)	(3)	(4)	(15)	(2)
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	UT	(165)	-	-	-	-	(165)	-
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	WA	(57)	-	-	(57)	-	-	-
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	WYP	(110)	-	-	-	(110)	-	-
1080000	AC PR DPR EL PL SR	3921400	*SNOWMOBILES, MOTORCYCLES (4-WHEELED ATV	WYU	(16)	-	-	-	(16)	-	-
1080000	AC PR DPR EL PL SR	3921900	OVER-THE-ROAD SEMI-TRACTORS	OR	(225)	-	(225)	-	-	-	-
1080000	AC PR DPR EL PL SR	3921900	OVER-THE-ROAD SEMI-TRACTORS	SG	(320)	(5)	(83)	(25)	(45)	(142)	(19)
1080000	AC PR DPR EL PL SR	3921900	OVER-THE-ROAD SEMI-TRACTORS	SO	(139)	(3)	(38)	(11)	(18)	(61)	(8)
1080000	AC PR DPR EL PL SR	3921900	OVER-THE-ROAD SEMI-TRACTORS	UT	(694)	-	-	-	-	(694)	-
1080000	AC PR DPR EL PL SR	3921900	OVER-THE-ROAD SEMI-TRACTORS	WA	(150)	-	-	(150)	-	-	-
1080000	AC PR DPR EL PL SR	3921900	OVER-THE-ROAD SEMI-TRACTORS	WYP	(53)	-	-	-	(53)	-	-
1080000	AC PR DPR EL PL SR	3923000	TRANSPORTATION EQUIPMENT	SO	(1,085)	(24)	(294)	(83)	(142)	(478)	(63)
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	CA	(109)	(109)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	IDU	(280)	-	-	-	-	(280)	-
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	OR	(1,363)	-	(1,363)	-	-	-	-
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	SG	(2,664)	(39)	(693)	(208)	(377)	(1,187)	(160)
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	SO	(135)	(3)	(37)	(10)	(18)	(59)	(8)
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	UT	(1,664)	-	-	-	-	(1,664)	-
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	WA	(376)	-	-	(376)	-	-	-
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	WYP	(536)	-	-	-	(536)	-	-
1080000	AC PR DPR EL PL SR	3930000	STORES EQUIPMENT	WYU	(1)	-	-	-	(1)	-	-
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	CA	(377)	(377)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	IDU	(1,136)	-	-	-	-	(1,136)	-
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	OR	(5,413)	-	(5,413)	-	-	-	-
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	SE	(76)	(1)	(19)	(6)	(12)	(34)	(5)
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	SG	(11,430)	(167)	(2,972)	(894)	(1,618)	(5,091)	(685)
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	SO	(1,461)	(32)	(396)	(112)	(192)	(643)	(85)
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	UT	(7,174)	-	-	-	-	(7,174)	-
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	WA	(1,313)	-	-	(1,313)	-	-	-
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	WYP	(1,916)	-	-	-	(1,916)	-	-
1080000	AC PR DPR EL PL SR	3940000	*TLS, SHOP, GAR EQUIPMENT*	WYU	(301)	-	-	-	(301)	-	-
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	CA	(174)	(174)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	IDU	(726)	-	-	-	-	(726)	-
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	OR	(4,259)	-	(4,259)	-	-	-	-
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	SE	(636)	(9)	(159)	(47)	(98)	(284)	(41)
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	SG	(3,621)	(53)	(942)	(283)	(513)	(1,613)	(217)



Depreciation Reserve (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other		
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	SO	(2,780)	(61)	(754)	(213)	(365)	(1,224)	(162)	(1)	-
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	UT	(3,831)	-	-	-	-	(3,831)	-	-	-
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	WA	(771)	-	-	(771)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	WYP	(1,302)	-	-	-	(1,302)	-	-	-	-
1080000	AC PR DPR EL PL SR	3950000	LABORATORY EQUIPMENT	WYU	(82)	-	-	-	(82)	-	-	-	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	CA	(782)	(782)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	IDU	(1,538)	-	-	-	-	(1,538)	-	-	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	OR	(7,928)	-	(7,928)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	SG	(330)	(5)	(86)	(26)	(47)	(147)	(20)	(0)	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	SO	(1,089)	(24)	(295)	(83)	(143)	(480)	(64)	(0)	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	UT	(6,074)	-	-	-	-	(6,074)	-	-	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	WA	(1,738)	-	-	(1,738)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	WYP	(2,497)	-	-	-	(2,497)	-	-	-	-
1080000	AC PR DPR EL PL SR	3960300	AERIAL LIFT PB TRUCKS, 10000#-16000# GVW	WYU	(450)	-	-	-	(450)	-	-	-	-
1080000	AC PR DPR EL PL SR	3960700	TWO-AXLE DIGGER/DERRICK LINE TRUCKS	CA	(42)	(42)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3960700	TWO-AXLE DIGGER/DERRICK LINE TRUCKS	IDU	(114)	-	-	-	-	(114)	-	-	-
1080000	AC PR DPR EL PL SR	3960700	TWO-AXLE DIGGER/DERRICK LINE TRUCKS	OR	(448)	-	(448)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3960700	TWO-AXLE DIGGER/DERRICK LINE TRUCKS	SG	(78)	(1)	(20)	(6)	(11)	(35)	(5)	(0)	-
1080000	AC PR DPR EL PL SR	3960700	TWO-AXLE DIGGER/DERRICK LINE TRUCKS	UT	(232)	-	-	-	-	(232)	-	-	-
1080000	AC PR DPR EL PL SR	3960700	TWO-AXLE DIGGER/DERRICK LINE TRUCKS	WYU	(96)	-	-	-	(96)	-	-	-	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	CA	(413)	(413)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	IDU	(946)	-	-	-	-	(946)	-	-	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	OR	(5,340)	-	(5,340)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	SG	(589)	(9)	(153)	(46)	(83)	(263)	(35)	(0)	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	SO	(700)	(15)	(190)	(54)	(92)	(308)	(41)	(0)	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	UT	(5,070)	-	-	-	-	(5,070)	-	-	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	WA	(1,717)	-	-	(1,717)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	WYP	(1,310)	-	-	-	(1,310)	-	-	-	-
1080000	AC PR DPR EL PL SR	3960800	AERIAL LIFT P.B. TRUCKS, ABOVE 16000#GV	WYU	(255)	-	-	-	(255)	-	-	-	-
1080000	AC PR DPR EL PL SR	3961000	CRANES	SG	(204)	-	(204)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3961000	CRANES	OR	(1,228)	(18)	(319)	(96)	(174)	(547)	(74)	(0)	-
1080000	AC PR DPR EL PL SR	3961000	CRANES	UT	(1)	-	-	-	-	(1)	-	-	-
1080000	AC PR DPR EL PL SR	3961100	HEAVY CONSTRUCTION EQUIP, PRODUCT DIGGER	OR	(423)	-	(423)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3961100	HEAVY CONSTRUCTION EQUIP, PRODUCT DIGGER	SG	(8,838)	(129)	(2,298)	(691)	(1,251)	(3,937)	(529)	(3)	-
1080000	AC PR DPR EL PL SR	3961100	HEAVY CONSTRUCTION EQUIP, PRODUCT DIGGER	SO	(568)	(13)	(154)	(44)	(75)	(250)	(33)	(0)	-
1080000	AC PR DPR EL PL SR	3961100	HEAVY CONSTRUCTION EQUIP, PRODUCT DIGGER	UT	(637)	-	-	-	-	(637)	-	-	-
1080000	AC PR DPR EL PL SR	3961100	HEAVY CONSTRUCTION EQUIP, PRODUCT DIGGER	WYP	(166)	-	-	-	(166)	-	-	-	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	CA	(496)	(496)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	IDU	(1,043)	-	-	-	-	(1,043)	-	-	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	OR	(4,746)	-	(4,746)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	SG	(183)	(3)	(48)	(14)	(26)	(82)	(11)	(0)	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	SO	(701)	(15)	(190)	(54)	(92)	(309)	(41)	(0)	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	UT	(5,681)	-	-	-	-	(5,681)	-	-	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	WA	(1,156)	-	-	(1,156)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	WYP	(1,094)	-	-	-	(1,094)	-	-	-	-
1080000	AC PR DPR EL PL SR	3961200	THREE-AXLE DIGGER/DERRICK LINE TRUCKS	WYU	(211)	-	-	-	(211)	-	-	-	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	CA	(255)	(255)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	IDU	(589)	-	-	-	-	(589)	-	-	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	OR	(1,139)	-	(1,139)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	SE	(117)	(2)	(29)	(9)	(18)	(52)	(8)	(0)	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	SG	(2,519)	(37)	(655)	(197)	(357)	(1,122)	(151)	(1)	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	SO	(264)	(6)	(71)	(20)	(35)	(116)	(15)	(0)	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	UT	(2,053)	-	-	-	-	(2,053)	-	-	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	WA	(610)	-	-	(610)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	WYP	(529)	-	-	-	(529)	-	-	-	-
1080000	AC PR DPR EL PL SR	3961300	SNOWCATS, BACKHOES, TRENCHERS, SNOWBLOWR	WYU	(231)	-	-	-	(231)	-	-	-	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	CA	(2,488)	(2,488)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	CN	(1,993)	(47)	(618)	(136)	(145)	(963)	(85)	-	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	IDU	(5,128)	-	-	-	-	(5,128)	-	-	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	OR	(38,764)	-	(38,764)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	SE	(131)	(2)	(33)	(10)	(20)	(58)	(8)	(0)	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	SG	(77,400)	(1,133)	(20,125)	(6,051)	(10,955)	(34,477)	(4,636)	(23)	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	SO	(42,483)	(936)	(11,524)	(3,255)	(5,573)	(18,710)	(2,477)	(9)	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	UT	(24,936)	-	-	-	-	(24,936)	-	-	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	WA	(5,259)	-	-	(5,259)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	WYP	(10,343)	-	-	-	(10,343)	-	-	-	-
1080000	AC PR DPR EL PL SR	3970000	COMMUNICATION EQUIPMENT	WYU	(2,594)	-	-	-	(2,594)	-	-	-	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	CA	(233)	(233)	-	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	IDU	(241)	-	-	-	-	(241)	-	-	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	OR	(1,961)	-	(1,961)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	SE	(67)	(1)	(17)	(5)	(10)	(30)	(4)	(0)	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	SG	(3,031)	(44)	(788)	(237)	(429)	(1,350)	(182)	(1)	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	SO	(443)	(10)	(120)	(34)	(58)	(195)	(26)	(0)	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	UT	(1,550)	-	-	-	-	(1,550)	-	-	-





Depreciation Reserve (Actuals)  
 Year End: 06/2021  
 Allocation Method - Factor 2020 Protocol  
 (Allocated in Thousands)

Primary Account	Secondary Account		Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	WA	(407)	-	-	(407)	-	-	-	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	WYP	(483)	-	-	-	(483)	-	-	-
1080000	AC PR DPR EL PL SR	3972000	MOBILE RADIO EQUIPMENT	WYU	(86)	-	-	-	(86)	-	-	-
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	CA	(28)	(28)	-	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	CN	(51)	(1)	(16)	(4)	(4)	(25)	(2)	-
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	IDU	(36)	-	-	-	-	-	(36)	-
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	OR	(576)	-	(576)	-	-	-	-	-
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	SE	(3)	(0)	(1)	(0)	(0)	(1)	(0)	(0)
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	SG	(1,436)	(21)	(373)	(112)	(203)	(639)	(86)	(0)
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	SO	(1,414)	(31)	(384)	(108)	(185)	(623)	(82)	(0)
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	UT	(574)	-	-	-	-	(574)	-	-
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	WA	(96)	-	-	(96)	-	-	-	-
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	WYP	(81)	-	-	-	(81)	-	-	-
1080000	AC PR DPR EL PL SR	3980000	MISCELLANEOUS EQUIPMENT	WYU	(12)	-	-	-	(12)	-	-	-
<b>1080000 Total</b>					<b>(9,644,079)</b>	<b>(250,998)</b>	<b>(2,817,942)</b>	<b>(788,930)</b>	<b>(1,272,128)</b>	<b>(3,957,961)</b>	<b>(554,303)</b>	<b>(1,817)</b>
1083000	AC PR DPR-REMOVAL	288351	Reg Liab Contra - Carbon Decomm - ID	IDU	1,213	-	-	-	-	1,213	-	-
1083000	AC PR DPR-REMOVAL	288353	Reg Liab Contra - Carbon Decomm - UT	UT	(8,527)	-	-	-	-	(8,527)	-	-
1083000	AC PR DPR-REMOVAL	288365	Reg Liab - Steam Decomm - WA	WA	(1,785)	-	(1,785)	-	-	-	-	-
<b>1083000 Total</b>					<b>(9,099)</b>	<b>-</b>	<b>(1,785)</b>	<b>-</b>	<b>-</b>	<b>(8,527)</b>	<b>1,213</b>	<b>-</b>
1085000	AC PR DPR-ACCRUAL	145129	BUILDINGS - ACCUMULATED DEPRECIATION-NON	SO	1,246	27	338	95	163	549	73	0
1085000	AC PR DPR-ACCRUAL	145131	Accum Depr - Hydro - ID Klamath Adj	OTHER	620	-	-	-	-	-	-	620
1085000	AC PR DPR-ACCRUAL	145134	Accum Depr - Hydro - WY Klamath Adj	OTHER	1,484	-	-	-	-	-	-	1,484
1085000	AC PR DPR-ACCRUAL	145135	ACCUM DEPR-HYDRO DECOMMISSIONING	SG-P	(6,967)	(102)	(1,811)	(545)	(986)	(3,103)	(417)	(2)
1085000	AC PR DPR-ACCRUAL	145135	ACCUM DEPR-HYDRO DECOMMISSIONING	SG-U	(289)	(4)	(75)	(23)	(41)	(129)	(17)	(0)
1085000	AC PR DPR-ACCRUAL	145139	PRODUCTION PLANT-ACCUM DEPRECIATION	SG	19,189	281	4,989	1,500	2,716	8,547	1,149	6
1085000	AC PR DPR-ACCRUAL	145149	TRANSMISSION PLANT ACCUMULATED DEPR NON-	SG	5,037	74	1,310	394	713	2,244	302	1
1085000	AC PR DPR-ACCRUAL	145169	DISTRIBUTION - ACCUMULATED DEPRECIATION	CA	381	381	-	-	-	-	-	-
1085000	AC PR DPR-ACCRUAL	145169	DISTRIBUTION - ACCUMULATED DEPRECIATION	IDU	282	-	-	-	-	-	282	-
1085000	AC PR DPR-ACCRUAL	145169	DISTRIBUTION - ACCUMULATED DEPRECIATION	OR	2,062	-	2,062	-	-	-	-	-
1085000	AC PR DPR-ACCRUAL	145169	DISTRIBUTION - ACCUMULATED DEPRECIATION	UT	2,090	-	-	-	-	2,090	-	-
1085000	AC PR DPR-ACCRUAL	145169	DISTRIBUTION - ACCUMULATED DEPRECIATION	WA	523	-	-	523	-	-	-	-
1085000	AC PR DPR-ACCRUAL	145169	DISTRIBUTION - ACCUMULATED DEPRECIATION	WYU	758	-	-	-	-	758	-	-
<b>1085000 Total</b>					<b>26,416</b>	<b>657</b>	<b>6,812</b>	<b>1,945</b>	<b>3,324</b>	<b>10,197</b>	<b>1,371</b>	<b>5</b>
<b>Grand Total</b>					<b>(9,626,762)</b>	<b>(250,341)</b>	<b>(2,811,130)</b>	<b>(788,770)</b>	<b>(1,268,804)</b>	<b>(3,956,291)</b>	<b>(551,719)</b>	<b>(1,811)</b>

# **B18.AMORTIZATION RESERVE**



**Amortization Reserve (Actuals)**

Year End: 06/2021

Allocation Method - Factor 2020 Protocol

(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
1110000	AC PR AMR EL PT SR 3020000	FRANCHISES AND CONSENTS	IDU (966)	-	-	-	-	-	(966)	-	-
1110000	AC PR AMR EL PT SR 3020000	FRANCHISES AND CONSENTS	SG (5,501)	(80)	(1,430)	(430)	(779)	(2,450)	(329)	(2)	-
1110000	AC PR AMR EL PT SR 3020000	FRANCHISES AND CONSENTS	SG-P (114,429)	(1,675)	(29,753)	(8,947)	(16,196)	(50,971)	(6,854)	(33)	-
1110000	AC PR AMR EL PT SR 3020000	FRANCHISES AND CONSENTS	SG-U (6,141)	(90)	(1,597)	(480)	(869)	(2,735)	(368)	(2)	-
1110000	AC PR AMR EL PT SR 3020000	FRANCHISES AND CONSENTS	UT 32,081	-	-	-	-	32,081	-	-	-
1110000	AC PR AMR EL PT SR 3031040	INTANGIBLE PLANT	OR (122)	-	(122)	-	-	-	-	-	-
1110000	AC PR AMR EL PT SR 3031040	INTANGIBLE PLANT	SG (16,872)	(247)	(4,387)	(1,319)	(2,388)	(7,515)	(1,011)	(5)	-
1110000	AC PR AMR EL PT SR 3031040	INTANGIBLE PLANT	UT (88)	-	-	-	-	(88)	-	-	-
1110000	AC PR AMR EL PT SR 3031040	INTANGIBLE PLANT	WYP (173)	-	-	-	(173)	-	-	-	-
1110000	AC PR AMR EL PT SR 3031050	REGIONAL CONST MGMT SYS	SO (11,031)	(243)	(2,992)	(845)	(1,447)	(4,858)	(643)	(2)	-
1110000	AC PR AMR EL PT SR 3031080	FUEL MGMT SYSTEM	SO (3,293)	(73)	(893)	(252)	(432)	(1,450)	(192)	(1)	-
1110000	AC PR AMR EL PT SR 3031230	AUTOMATE POLE CARD SYSTEM	SO (4,410)	(97)	(1,196)	(338)	(578)	(1,942)	(257)	(1)	-
1110000	AC PR AMR EL PT SR 3031680	DISTRIBUTION AUTOMATION PILOT	SO (13,886)	(306)	(3,767)	(1,064)	(1,822)	(6,115)	(810)	(3)	-
1110000	AC PR AMR EL PT SR 3031830	CUSTOMER SERVICE SYSTEM	CN (124,697)	(2,923)	(38,644)	(8,535)	(9,079)	(60,226)	(5,290)	-	-
1110000	AC PR AMR EL PT SR 3032040	SAP	SO (159,158)	(3,506)	(43,172)	(12,195)	(20,879)	(70,093)	(9,280)	(33)	-
1110000	AC PR AMR EL PT SR 3032130	PROD & TRANS PLANT	SG (195)	(3)	(51)	(15)	(28)	(87)	(12)	(0)	-
1110000	AC PR AMR EL PT SR 3032140	MINING PLANT	SO (135)	(3)	(37)	(10)	(18)	(59)	(8)	(0)	-
1110000	AC PR AMR EL PT SR 3032150	HYDRO PLANT	SO (315)	(7)	(86)	(24)	(41)	(139)	(18)	(0)	-
1110000	AC PR AMR EL PT SR 3032220	ENTERPRISE DATA WRHSE - BI RPTG TOOL	SO (1,660)	(37)	(450)	(127)	(218)	(731)	(97)	(0)	-
1110000	AC PR AMR EL PT SR 3032270	ENTERPRISE DATA WAREHOUSE	SO (5,877)	(129)	(1,594)	(450)	(771)	(2,588)	(343)	(1)	-
1110000	AC PR AMR EL PT SR 3032330	FIELDNET PRO METER READING SYST -HRP REP	SO (2,908)	(64)	(789)	(223)	(381)	(1,281)	(170)	(1)	-
1110000	AC PR AMR EL PT SR 3032340	FACILITY INSPECTION REPORTING SYSTEM	SO (2,000)	(44)	(542)	(153)	(262)	(881)	(117)	(0)	-
1110000	AC PR AMR EL PT SR 3032360	2002 GRID NET POWER COST MODELING	SO (8,958)	(197)	(2,430)	(686)	(1,175)	(3,945)	(522)	(2)	-
1110000	AC PR AMR EL PT SR 3032450	MID OFFICE IMPROVEMENT PROJECT	SO (10,561)	(233)	(2,865)	(809)	(1,385)	(4,651)	(616)	(2)	-
1110000	AC PR AMR EL PT SR 3032510	OPERATIONS MAPPING SYSTEM	SO (10,386)	(229)	(2,817)	(796)	(1,363)	(4,574)	(606)	(2)	-
1110000	AC PR AMR EL PT SR 3032530	POLE ATTACHMENT MGMT SYSTEM	SO (1,892)	(42)	(513)	(145)	(248)	(833)	(110)	(0)	-
1110000	AC PR AMR EL PT SR 3032590	SUBSTATION/CIRCUIT HISTORY OF OPERATIONS	SO (2,416)	(53)	(655)	(185)	(317)	(1,064)	(141)	(0)	-
1110000	AC PR AMR EL PT SR 3032600	SINGLE PERSON SCHEDULING	SO (13,003)	(286)	(3,527)	(996)	(1,706)	(5,727)	(758)	(3)	-
1110000	AC PR AMR EL PT SR 3032640	TIBCO SOFTWARE	SO (6,371)	(140)	(1,728)	(488)	(836)	(2,806)	(371)	(1)	-
1110000	AC PR AMR EL PT SR 3032680	TRANSMISSION WHOLESALE BILLING SYSTEM	SG (1,599)	(23)	(416)	(125)	(226)	(712)	(96)	(0)	-
1110000	AC PR AMR EL PT SR 3032690	UTILITY INTERNATIONAL FORECASTING MODEL	SO (669)	(15)	(182)	(51)	(88)	(295)	(39)	(0)	-
1110000	AC PR AMR EL PT SR 3032710	ROUGE RIVER HYDRO INTANGIBLES	SG (97)	(1)	(25)	(8)	(14)	(43)	(6)	(0)	-
1110000	AC PR AMR EL PT SR 3032740	GADSBY INTANGIBLE ASSETS	SG (10)	(0)	(3)	(1)	(1)	(5)	(1)	(0)	-
1110000	AC PR AMR EL PT SR 3032760	SWIFT 2 IMPROVEMENTS	SG (7,277)	(107)	(1,892)	(569)	(1,030)	(3,242)	(436)	(2)	-
1110000	AC PR AMR EL PT SR 3032770	NORTH UMPQUA - SETTLEMENT AGREEMENT	SG (235)	(3)	(61)	(18)	(33)	(105)	(14)	(0)	-
1110000	AC PR AMR EL PT SR 3032780	BEAR RIVER-SETTLEMENT AGREEMENT	SG (69)	(1)	(18)	(5)	(10)	(31)	(4)	(0)	-
1110000	AC PR AMR EL PT SR 3032780	BEAR RIVER-SETTLEMENT AGREEMENT	SG-U (12)	(0)	(3)	(1)	(2)	(5)	(1)	(0)	-
1110000	AC PR AMR EL PT SR 3032830	VCPRO - VISUALCOMPUSETPRO XEROX CUST STM	SO (2,579)	(57)	(700)	(198)	(338)	(1,136)	(150)	(1)	-
1110000	AC PR AMR EL PT SR 3032860	WEB SOFTWARE	SO (6,320)	(139)	(1,714)	(484)	(829)	(2,783)	(368)	(1)	-
1110000	AC PR AMR EL PT SR 3032900	IDAHO TRANSMISSION CUSTOMER-OWNED ASSET	SG (3,507)	(51)	(912)	(274)	(496)	(1,562)	(210)	(1)	-
1110000	AC PR AMR EL PT SR 3032990	P8DM - FILENET P8 DOCUMENT MANAGEMENT (E	SO (5,827)	(128)	(1,581)	(447)	(764)	(2,566)	(340)	(1)	-
1110000	AC PR AMR EL PT SR 3033090	STEAM PLANT INTANGIBLE ASSETS	SG (31,689)	(464)	(8,240)	(2,478)	(4,485)	(14,115)	(1,898)	(9)	-
1110000	AC PR AMR EL PT SR 3033170	GTX VERSION 7 SOFTWARE	CN (7,430)	(174)	(2,303)	(509)	(541)	(3,589)	(315)	-	-
1110000	AC PR AMR EL PT SR 3033190	ITRON METER READING SOFTWARE	CN (5,868)	(138)	(1,819)	(402)	(427)	(2,834)	(249)	-	-
1110000	AC PR AMR EL PT SR 3033210	ARCFM SOFTWARE	SO (3,978)	(88)	(1,079)	(305)	(522)	(1,752)	(232)	(1)	-
1110000	AC PR AMR EL PT SR 3033220	MONARCH EMS/SCADA	SO (15,202)	(335)	(4,124)	(1,165)	(1,994)	(6,695)	(886)	(3)	-
1110000	AC PR AMR EL PT SR 3033240	IEE - Itron Enterprise Addition	CN (3,650)	(86)	(1,131)	(250)	(266)	(1,763)	(155)	-	-
1110000	AC PR AMR EL PT SR 3033250	AMI Metering Software	CN (14,644)	(343)	(4,538)	(1,002)	(1,066)	(7,073)	(621)	-	-
1110000	AC PR AMR EL PT SR 3033260	Big Data & Analytics	SO (1,267)	(28)	(344)	(97)	(166)	(558)	(74)	(0)	-
1110000	AC PR AMR EL PT SR 3033270	CES - Customer Experience System	CN (1,035)	(24)	(321)	(71)	(75)	(500)	(44)	-	-
1110000	AC PR AMR EL PT SR 3033280	MAPAPPS - Mapping Systems Application	SO (300)	(7)	(81)	(23)	(39)	(132)	(18)	(0)	-
1110000	AC PR AMR EL PT SR 3033290	CUSTOMER CONTACTS	CN (94)	(2)	(29)	(6)	(7)	(46)	(4)	-	-
1110000	AC PR AMR EL PT SR 3033300	SECID - CUST SECURE WEB LOGIN	CN (1,085)	(25)	(336)	(74)	(79)	(524)	(46)	-	-
1110000	AC PR AMR EL PT SR 3033310	C&T - ENERGY TRADING SYSTEM	SO (18,769)	(413)	(5,091)	(1,438)	(2,462)	(8,266)	(1,094)	(4)	-
1110000	AC PR AMR EL PT SR 3033320	CAS - CONTROL AREA SCHEDULING (TRANSM)	SG (9,971)	(146)	(2,593)	(780)	(1,411)	(4,441)	(597)	(3)	-
1110000	AC PR AMR EL PT SR 3033370	DISTRIBUTION INTANGIBLES	WYP (37)	-	-	-	(37)	-	-	-	-
1110000	AC PR AMR EL PT SR 3033380	MISCELLANEOUS SMALL SOFTWARE PACKAGES	SG (782)	(11)	(203)	(61)	(111)	(348)	(47)	(0)	-
1110000	AC PR AMR EL PT SR 3033390	RMT TRADE SYSTEM	SO (923)	(20)	(250)	(71)	(121)	(407)	(54)	(0)	-
1110000	AC PR AMR EL PT SR 3033410	M365	SO (31)	(1)	(8)	(2)	(4)	(14)	(2)	(0)	-
1110000	AC PR AMR EL PT SR 3034900	MISC - MISCELLANEOUS	CA (6)	(6)	-	-	-	-	-	-	-
1110000	AC PR AMR EL PT SR 3034900	MISC - MISCELLANEOUS	CN (3)	(0)	(1)	(0)	(0)	(1)	(0)	-	-



**Amortization Reserve (Actuals)**

Year End: 06/2021

Allocation Method - Factor 2020 Protocol

(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other	
1110000	AC PR AMR EL PT SR	3034900	MISC - MISCELLANEOUS	IDU	(10)	-	-	-	-	(10)	-	-
1110000	AC PR AMR EL PT SR	3034900	MISC - MISCELLANEOUS	OR	(7)	-	(7)	-	-	-	-	-
1110000	AC PR AMR EL PT SR	3034900	MISC - MISCELLANEOUS	SE	(2)	(0)	(0)	(0)	(0)	(1)	(0)	(0)
1110000	AC PR AMR EL PT SR	3034900	MISC - MISCELLANEOUS	SG	(27,403)	(401)	(7,125)	(2,142)	(3,879)	(12,206)	(1,641)	(8)
1110000	AC PR AMR EL PT SR	3034900	MISC - MISCELLANEOUS	SO	(1,234)	(27)	(335)	(95)	(162)	(544)	(72)	(0)
1110000	AC PR AMR EL PT SR	3034900	MISC - MISCELLANEOUS	UT	(16)	-	-	-	-	(16)	-	-
1110000	AC PR AMR EL PT SR	3034900	MISC - MISCELLANEOUS	WA	(11)	-	-	(11)	-	-	-	-
1110000	AC PR AMR EL PT SR	3034900	MISC - MISCELLANEOUS	WYP	(166)	-	-	-	(166)	-	-	-
1110000	AC PR AMR EL PT SR	3035320	HYDRO PLANT INTANGIBLES	SG	(771)	(11)	(201)	(60)	(109)	(344)	(46)	(0)
1110000	AC PR AMR EL PT SR	3035320	HYDRO PLANT INTANGIBLES	SG-P	(116)	(2)	(30)	(9)	(16)	(52)	(7)	(0)
1110000	AC PR AMR EL PT SR	3035322	ACD-Call Center Automated Call Distribut	CN	(4,132)	(97)	(1,281)	(283)	(301)	(1,996)	(175)	-
1110000	AC PR AMR EL PT SR	3035330	OATI-OASIS INTERFACE	SO	(1,240)	(27)	(336)	(95)	(163)	(546)	(72)	(0)
1110000	AC PR AMR EL PT SR	3316000	STRUCTURES - LEASE IMPROVEMENTS	SG-P	(3,139)	(46)	(816)	(245)	(444)	(1,398)	(188)	(1)
1110000	AC PR AMR EL PT SR	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	CA	(506)	(506)	-	-	-	-	-	-
1110000	AC PR AMR EL PT SR	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	IDU	(334)	-	-	-	-	(334)	-	-
1110000	AC PR AMR EL PT SR	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	OR	(4,741)	-	(4,741)	-	-	-	-	-
1110000	AC PR AMR EL PT SR	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	SO	(1,175)	(26)	(319)	(90)	(154)	(517)	(69)	(0)
1110000	AC PR AMR EL PT SR	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	UT	(33)	-	-	-	-	(33)	-	-
1110000	AC PR AMR EL PT SR	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	WA	(1,855)	-	-	(1,855)	-	-	-	-
1110000	AC PR AMR EL PT SR	3901000	LEASEHOLD IMPROVEMENTS-OFFICE STR	WYP	(4,454)	-	-	-	(4,454)	-	-	-
<b>1110000 Total</b>					<b>(691,674)</b>	<b>(14,687)</b>	<b>(201,225)</b>	<b>(55,314)</b>	<b>(90,888)</b>	<b>(288,924)</b>	<b>(40,503)</b>	<b>(132)</b>
<b>Grand Total</b>					<b>(691,674)</b>	<b>(14,687)</b>	<b>(201,225)</b>	<b>(55,314)</b>	<b>(90,888)</b>	<b>(288,924)</b>	<b>(40,503)</b>	<b>(132)</b>

# **B19.D.I.T. BALANCE AND I.T.C**



**Deferred Income Tax Balance (Actuals)**  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
19010000	ACM DEF INCM TAXES 287061	CA	599	599	-	-	-	-	-	-	-
19010000	ACM DEF INCM TAXES 287062	IDU	1,934	-	-	-	-	-	1,934	-	-
19000000	ACM DEF INCM TAXES 287063	OR	0	0	0	-	-	-	-	-	-
19010000	ACM DEF INCM TAXES 287064	UT	12,262	-	-	-	-	12,262	-	-	-
19000000	ACM DEF INCM TAXES 287065	WA	3,594	-	-	3,594	-	-	-	-	-
19000000	ACM DEF INCM TAXES 287066	WYU	8,727	-	-	-	8,727	-	-	-	-
<b>19000000 Total</b>	<b>287066</b>		<b>27,117</b>	<b>599</b>	<b>0</b>	<b>3,594</b>	<b>8,727</b>	<b>12,262</b>	<b>1,934</b>	<b>-</b>	<b>-</b>
19010000	ACM DEF INC TAX 287045	WA	167	-	-	167	-	-	-	-	-
19010000	ACM DEF INC TAX 287047	OR	447	-	447	-	-	-	-	-	-
19010000	ACM DEF INC TAX 287048	WA	313	-	-	313	-	-	-	-	-
19010000	ACM DEF INC TAX 287049	CA	65	65	-	-	-	-	-	-	-
19010000	ACM DEF INC TAX 287051	OTHER	1,004	-	-	-	-	-	-	-	1,004
19010000	ACM DEF INC TAX 287053	OTHER	2,417	-	-	-	-	-	-	-	2,417
19010000	ACM DEF INC TAX 287055	OTHER	2,269	-	-	-	-	-	-	-	2,269
19010000	ACM DEF INC TAX 287067	SE	259	4	65	19	40	115	17	0	-
19010000	ACM DEF INC TAX 287111	CA	8,243	8,243	-	-	-	-	-	-	-
19010000	ACM DEF INC TAX 287112	IDU	21,025	-	-	-	-	-	21,025	-	-
19010000	ACM DEF INC TAX 287113	OR	92,188	-	92,188	-	-	-	-	-	-
19010000	ACM DEF INC TAX 287114	WA	22,135	-	-	22,135	-	-	-	-	-
19010000	ACM DEF INC TAX 287115	WYP	52,306	-	-	-	52,306	-	-	-	-
19010000	ACM DEF INC TAX 287116	UT	162,469	-	-	-	-	162,469	-	-	-
19010000	ACM DEF INC TAX 287121	CA	578	578	-	-	-	-	-	-	-
19010000	ACM DEF INC TAX 287122	IDU	112	-	-	-	-	-	112	-	-
19010000	ACM DEF INC TAX 287124	WA	5,900	-	-	5,900	-	-	-	-	-
19010000	ACM DEF INC TAX 287125	WYP	10,859	-	-	-	10,859	-	-	-	-
19010000	ACM DEF INC TAX 287173	WA	439	-	-	-	439	-	-	-	-
19010000	ACM DEF INC TAX 287174	CA	(7)	(7)	-	-	-	-	-	-	-
19010000	ACM DEF INC TAX 287175	IDU	(28)	-	-	-	-	-	(28)	-	-
19010000	ACM DEF INC TAX 287176	OR	2,135	-	2,135	-	-	-	-	-	-
19010000	ACM DEF INC TAX 287177	UT	4,819	-	-	-	-	4,819	-	-	-
19010000	ACM DEF INC TAX 287178	WYP	(69)	-	-	-	(69)	-	-	-	-
19010000	ACM DEF INC TAX 287180	SO	6,149	135	1,668	471	807	2,708	388	1	-
19010000	ACM DEF INC TAX 287191	CA	152	152	-	-	-	-	-	-	-
19010000	ACM DEF INC TAX 287192	IDU	14	-	-	-	-	-	14	-	-
19010000	ACM DEF INC TAX 287195	WA	299	-	-	299	-	-	-	-	-
19010000	ACM DEF INC TAX 287196	WYU	134	-	-	-	134	-	-	-	-
19010000	ACM DEF INC TAX 287198	SO	2,754	61	747	211	361	1,213	161	1	-
19010000	ACM DEF INC TAX 287199	BADDEBT	(41)	(1)	(20)	(6)	(0)	(12)	(2)	-	-
19010000	ACM DEF INC TAX 287200	OTHER	235	-	-	-	-	-	-	-	235
19010000	ACM DEF INC TAX 287206	WA	10,706	-	-	10,706	-	-	-	-	-
19010000	ACM DEF INC TAX 287209	OTHER	192	-	-	-	-	-	-	-	192
19010000	ACM DEF INC TAX 287211	OTHER	294	-	-	-	-	-	-	-	294
19010000	ACM DEF INC TAX 287212	OTHER	1,865	-	-	-	-	-	-	-	1,865
19010000	ACM DEF INC TAX 287214	SO	75	2	20	6	10	33	4	0	-
19010000	ACM DEF INC TAX 287216	SE	1,877	26	468	138	288	837	120	1	-
19010000	ACM DEF INC TAX 287219	SG	58	1	15	5	8	26	3	0	-
19010000	ACM DEF INC TAX 287220	SE	28,304	398	7,053	2,076	4,343	12,617	1,808	10	-
19010000	ACM DEF INC TAX 287225	WA	8	-	-	8	-	-	-	-	-
19010000	ACM DEF INC TAX 287227	OTHER	4,894	-	-	-	-	-	-	-	4,894
19010000	ACM DEF INC TAX 287229	OTHER	(0)	-	-	-	-	-	-	-	(0)
19010000	ACM DEF INC TAX 287230	OTHER	11	-	-	-	-	-	-	-	11
19010000	ACM DEF INC TAX 287231	OTHER	3,705	-	-	-	-	-	-	-	3,705
19010000	ACM DEF INC TAX 287233	OTHER	2,425	-	-	-	-	-	-	-	2,425
19010000	ACM DEF INC TAX 287235	OTHER	130	-	-	-	-	-	-	-	130
19010000	ACM DEF INC TAX 287237	OTHER	157	-	-	-	-	-	-	-	157
19010000	ACM DEF INC TAX 287238	OTHER	1,364	-	-	-	-	-	-	-	1,364
19010000	ACM DEF INC TAX 287253	OR	3,053	-	3,053	-	-	-	-	-	-









Deferred Income Tax Balance (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
2831000	AC DEF IN TX UTIL	287647	(25)	(0)	-	-	-	-	(25)	-	-
2831000	AC DEF IN TX UTIL	287653	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	-
2831000	AC DEF IN TX UTIL	287661	(637)	(9)	(166)	(90)	(60)	(284)	(38)	(0)	-
2831000	AC DEF IN TX UTIL	287662	(1,003)	-	(1,003)	-	-	-	-	-	-
2831000	AC DEF IN TX UTIL	287664	(1,705)	-	-	-	-	(1,705)	-	-	-
2831000	AC DEF IN TX UTIL	287665	(70)	-	-	-	-	-	(70)	-	-
2831000	AC DEF IN TX UTIL	287669	(1,001)	(22)	(272)	(77)	(131)	(441)	(58)	(0)	-
2831000	AC DEF IN TX UTIL	287675	(762)	(16)	(195)	(57)	(100)	(349)	(45)	(0)	(0)
2831000	AC DEF IN TX UTIL	287708	(5,113)	(113)	(1,387)	(392)	(671)	(2,252)	(298)	(1)	-
2831000	AC DEF IN TX UTIL	287738	(103,189)	(2,273)	(27,990)	(7,907)	(13,537)	(45,445)	(6,016)	(21)	-
2831000	AC DEF IN TX UTIL	287739	412	9	112	32	54	181	24	0	-
2831000	AC DEF IN TX UTIL	287747	(0)	-	-	-	-	-	-	-	(0)
2831000	AC DEF IN TX UTIL	287770	(906)	-	-	-	-	-	-	-	(906)
2831000	AC DEF IN TX UTIL	287772	(0)	-	-	-	-	-	-	-	(0)
2831000	AC DEF IN TX UTIL	287784	(140)	-	-	-	-	-	-	-	(140)
2831000	AC DEF IN TX UTIL	287840	(88,931)	(637)	(17,178)	(5,056)	(10,576)	(30,727)	(4,402)	(23)	-
2831000	AC DEF IN TX UTIL	287841	637	637	-	-	-	-	-	-	-
2831000	AC DEF IN TX UTIL	287842	657	-	-	-	-	657	-	-	-
2831000	AC DEF IN TX UTIL	287843	2,330	-	2,330	-	-	-	-	-	-
2831000	AC DEF IN TX UTIL	287844	227	-	-	-	-	227	-	-	-
2831000	AC DEF IN TX UTIL	287845	2,525	-	-	2,525	-	-	-	-	-
2831000	AC DEF IN TX UTIL	287846	813	-	-	-	813	-	-	-	-
2831000	AC DEF IN TX UTIL	287848	(595)	(13)	(161)	(78)	(46)	(262)	(35)	(0)	-
2831000	AC DEF IN TX UTIL	287849	29,952	421	7,464	2,197	4,596	13,352	1,913	10	-
2831000	AC DEF IN TX UTIL	287850	1,168	-	-	-	-	-	-	-	1,168
2831000	AC DEF IN TX UTIL	287851	(0)	-	-	-	-	-	-	-	(0)
2831000	AC DEF IN TX UTIL	287855	1,991	-	-	-	-	-	-	-	1,991
2831000	AC DEF IN TX UTIL	287858	(19)	-	-	-	-	-	-	-	(19)
2831000	AC DEF IN TX UTIL	287860	(96)	-	-	-	-	-	-	-	(96)
2831000	AC DEF IN TX UTIL	287861	(115)	-	-	-	-	-	-	-	(115)
2831000	AC DEF IN TX UTIL	287864	(1)	-	-	-	-	-	-	-	(1)
2831000	AC DEF IN TX UTIL	287868	(324)	-	-	-	(324)	-	-	-	-
2831000	AC DEF IN TX UTIL	287871	(1,317)	-	-	-	-	-	-	-	(1,317)
2831000	AC DEF IN TX UTIL	287882	(208)	-	-	-	-	-	-	-	(208)
2831000	AC DEF IN TX UTIL	287888	(31)	-	-	-	-	-	-	-	(31)
2831000	AC DEF IN TX UTIL	287896	(0)	-	-	-	-	-	-	-	(0)
2831000	AC DEF IN TX UTIL	287897	(18,772)	-	-	-	-	-	-	-	(18,772)
2831000	AC DEF IN TX UTIL	287897	(1,518)	-	-	-	-	-	-	-	(1,518)
2831000	AC DEF IN TX UTIL	287899	(108)	-	-	-	-	(108)	-	-	-
2831000	AC DEF IN TX UTIL	287903	(18)	-	-	-	-	(18)	-	-	-
2831000	AC DEF IN TX UTIL	287906	(477)	-	-	-	-	(477)	-	-	-
2831000	AC DEF IN TX UTIL	287907	(48)	(1)	(12)	(7)	(4)	(21)	(3)	(0)	-
2831000	AC DEF IN TX UTIL	287908	(120)	(2)	(31)	(17)	(9)	(53)	(7)	(0)	-
2831000	AC DEF IN TX UTIL	287917	(5,148)	-	(5,148)	-	-	-	-	-	-
2831000	AC DEF IN TX UTIL	287919	(522)	-	-	-	-	-	-	-	(522)
2831000	AC DEF IN TX UTIL	287935	(453)	(7)	(118)	(64)	(35)	(202)	(27)	(0)	-
2831000	AC DEF IN TX UTIL	287939	4,381	-	-	-	-	-	-	-	4,381
2831000	AC DEF IN TX UTIL	287942	(1,940)	-	-	-	-	-	-	-	(1,940)
2831000	AC DEF IN TX UTIL	287971	(4,381)	-	-	-	-	-	-	-	(4,381)
2831000	AC DEF IN TX UTIL	287975	(55)	-	-	-	-	-	-	-	(55)
2831000	AC DEF IN TX UTIL	287977	(157)	-	-	-	-	-	-	-	(157)
2831000	AC DEF IN TX UTIL	287981	(1,462)	-	-	-	-	-	-	-	(1,462)
2831000	AC DEF IN TX UTIL	287982	(315)	-	-	-	-	(315)	-	-	-
2831000	AC DEF IN TX UTIL	287983	(1,087)	-	-	-	-	(1,087)	-	-	-
2831000	AC DEF IN TX UTIL	287985	(596)	-	-	-	-	(596)	-	-	-
2831000	AC DEF IN TX UTIL	287986	0	-	-	-	-	0	-	-	-
2831000	AC DEF IN TX UTIL	287994	(135)	(135)	-	-	-	-	-	-	-



Deferred Income Tax Balance (Actuals)  
Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	DTL 415.675 RA Pref Stock Redemption-UT	DTL 415.862 RA-CA Mobile Home Park Conv	Alloc		Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other	
				OTHER	OTHER										
2831000	287996			(55)	(55)										(55)
2831000	287997			(54)	(54)										(54)
<b>2831000 Total</b>				<b>(287,197)</b>	<b>(287,197)</b>		<b>(4,415)</b>	<b>(54,156)</b>	<b>(11,331)</b>	<b>(36,642)</b>	<b>(86,245)</b>	<b>(12,042)</b>	<b>(44)</b>	<b>(92,321)</b>	
<b>Grand Total</b>				<b>(2,565,819)</b>	<b>(2,565,819)</b>		<b>(53,491)</b>	<b>(623,398)</b>	<b>(134,782)</b>	<b>(364,617)</b>	<b>(1,124,357)</b>	<b>(150,713)</b>	<b>(5,750)</b>	<b>(58,882)</b>	



**Investment Tax Credit Balance (Actuals)**

Year End: 06/2021

Allocation Method - Factor 2020 Protocol

(Allocated in Thousands)

Primary Account		Secondary Account		Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
2551000	ACC DEF ITC - FED	285620	Accum Def ITC - Solar Arrays - 2013	SG	(115)	(2)	(30)	(9)	(16)	(51)	(7)	(0)	-
2551000	ACC DEF ITC - FED	285621	Accum Def ITC - Solar Arrays - 2014	SG	(78)	(1)	(20)	(6)	(11)	(35)	(5)	(0)	-
2551000	ACC DEF ITC - FED	285622	Accum Def ITC - Solar Battery	UT	(1,391)	-	-	-	-	(1,391)	-	-	-
2551000	ACC DEF ITC - FED	285623	Accum Def ITC - Solar Facility	UT	(633)	-	-	-	-	(633)	-	-	-
<b>2551000 Total</b>					<b>(2,217)</b>	<b>(3)</b>	<b>(50)</b>	<b>(15)</b>	<b>(27)</b>	<b>(2,110)</b>	<b>(12)</b>	<b>(0)</b>	-
2552000	ACC DEF ITC-IDAHO	285612	Acc Def Idaho ITC-ID situs ATL	IDU	(28)	-	-	-	-	-	(28)	-	-
<b>2552000 Total</b>					<b>(28)</b>	-	-	-	-	-	<b>(28)</b>	-	-
<b>Grand Total</b>					<b>(2,245)</b>	<b>(3)</b>	<b>(50)</b>	<b>(15)</b>	<b>(27)</b>	<b>(2,110)</b>	<b>(40)</b>	<b>(0)</b>	-

# **B20. CUSTOMER ADVANCES**



**Customer Advances (Actuals)**

Year End: 06/2021  
Allocation Method - Factor 2020 Protocol  
(Allocated in Thousands)

Primary Account	Secondary Account	Alloc	Total	Calif	Oregon	Wash	Wyoming	Utah	Idaho	FERC	Other
2520000	CUST ADV CONSTRUCT	OR	(1,424)	-	(1,424)	-	-	-	-	-	-
2520000	CUST ADV CONSTRUCT	SG	(30,469)	(446)	(7,922)	(2,382)	(4,313)	(13,572)	(1,825)	-	(9)
2520000	CUST ADV CONSTRUCT	UT	(116)	-	-	-	-	(116)	-	-	-
2520000	CUST ADV CONSTRUCT	SG	(4,351)	(64)	(1,131)	(340)	(616)	(1,938)	(261)	-	(1)
2520000	CUST ADV CONSTRUCT	UT	(169)	-	-	-	-	(169)	-	-	-
2520000	CUST ADV CONSTRUCT	WA	(1)	-	-	(1)	-	-	-	-	-
2520000	CUST ADV CONSTRUCT	SG	(67,579)	(989)	(17,572)	(5,284)	(9,565)	(30,102)	(4,048)	(20)	-
<b>2520000 Total</b>			<b>(104,109)</b>	<b>(1,499)</b>	<b>(28,050)</b>	<b>(8,007)</b>	<b>(14,494)</b>	<b>(45,897)</b>	<b>(6,133)</b>	<b>(30)</b>	<b>(30)</b>
<b>Grand Total</b>			<b>(104,109)</b>	<b>(1,499)</b>	<b>(28,050)</b>	<b>(8,007)</b>	<b>(14,494)</b>	<b>(45,897)</b>	<b>(6,133)</b>	<b>(30)</b>	<b>(30)</b>

**REDACTED**

Docket No. UE 399

Exhibit PAC/2003

Witness: Sherona L. Cheung

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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**REDACTED**

Exhibit Accompanying Reply Testimony of Sherona L. Cheung

Wage and Employee Benefits Escalators

July 2022

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS  
ENTIRETY AND IS PROVIDED UNDER SEPARATE  
COVER**

**REDACTED**

Docket No. UE 399

Exhibit PAC/2004

Witness: Sherona L. Cheung

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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**REDACTED**

Exhibit Accompanying Reply Testimony of Sherona L. Cheung

Deferral Amortization Schedules

July 2022



**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Deferral Amortization Schedules**  
**Annual Amortization Summary**

	<b>December 2022</b>	<b>Amortization</b>	<b>Annual</b>	<b>Interest</b>
<b>Deferral Docket</b>	<b>Balance</b>	<b>Period</b>	<b>Amortization</b>	<b>Rate</b>
UM 1964 Transportation Electrification Program	2,839,892	3 Years	974,165	1.820%
UM 2134 Cedar Springs II	681,475	3 Years	233,766	1.820%
UM 2186 TB Flats	17,900,662	3 Years	6,140,445	1.820%
UM 2167 Renewable Energy Credits from Pryor Mountain		3 Years		1.820%
UM 2142 Cholla Unit 4-Related Property Tax Expense	639,589	3 Years	219,065	1.820%
UM 2063 COVID-19 Deferral	17,887,722	4 Years	4,643,594	1.820%
<b>Proposed Annual Amortization</b>	<b>39,585,213</b>		<b>12,086,128</b>	

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Deferral Amortization Schedules**  
**Oregon Transportation Electrification Pilot Programs**

	<u>Amortization</u>	
Base Period Amount (below)	-	
Pro Forma Amount (below)	974,165	
Adjustment:	<u>974,165</u>	Exhibit PAC/1002/245

	Opening Bal.	Accrual <sup>1</sup>	Amortization	Interest <sup>2</sup>	Ending Bal.
2021 June	2,173,972	37,436	-	13,041	2,224,449
July	2,224,449	11,430	-	13,264	2,249,143
August	2,249,143	49,244	-	13,524	2,311,911
September	2,311,911	136,742	-	14,157	2,462,810
October	2,462,810	24,868	-	14,722	2,502,400
November	2,502,400	56,269	-	15,051	2,573,720
December	2,573,720	55,633	-	15,473	2,644,827
2022 January	2,644,827	-	-	15,731	2,660,557
February	2,660,557	-	-	15,824	2,676,381
March	2,676,381	-	-	15,918	2,692,300
April	2,692,300	-	-	16,013	2,708,312
May	2,708,312	-	-	16,108	2,724,421
June	2,724,421	-	-	16,204	2,740,625
July	2,740,625	-	-	16,300	2,756,925
August	2,756,925	-	-	16,397	2,773,322
September	2,773,322	-	-	16,495	2,789,817
October	2,789,817	-	-	16,593	2,806,410
November	2,806,410	-	-	16,692	2,823,101
December	2,823,101	-	-	16,791	2,839,892
2023 January	2,839,892	-	81,180	4,369	2,763,081
February	2,763,081	-	81,180	4,252	2,686,152
March	2,686,152	-	81,180	4,136	2,609,108
April	2,609,108	-	81,180	4,019	2,531,946
May	2,531,946	-	81,180	3,902	2,454,667
June	2,454,667	-	81,180	3,784	2,377,271
July	2,377,271	-	81,180	3,667	2,299,758
August	2,299,758	-	81,180	3,550	2,222,127
September	2,222,127	-	81,180	3,432	2,144,378
October	2,144,378	-	81,180	3,314	2,066,512
November	2,066,512	-	81,180	3,196	1,988,527
December	1,988,527	-	81,180	3,077	1,910,424
<b>Pro Forma Amort =</b>			<b>974,165</b>		

Note:

1. Reflects accrued amounts through December 2021. Starting 1/1/2022, TE Pilot costs are expected to be recovered through the System Benefits Charge.
2. Interest accrual at authorized rate of return during deferral period, and at current Modified Blended Treasury rate during amortization period.

	pre 2021	2021
Auth. ROR	7.621%	7.137%
	Ref UE-263	Ref UE-374
	2022	
MBTR	1.820%	
	Ref UM-1147	

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Deferral Amortization Schedules**  
**Cedar Springs II - Amortization Summary**

	<u><b>Amortization</b></u>
Base Period Amount (below)	-
Pro Forma Amount (below)	233,766
Adjustment:	<u><u>233,766</u></u>

**Deferral date 12/10/2020**

	<u>Opening Bal.</u>	<u>Accrual<sup>1</sup></u>	<u>Amortization</u>	<u>Interest<sup>2,3</sup></u>	<u>Ending Bal.</u>
2020 December	-	591,072	-	-	591,072
2021 January	591,072	-	-	3,515	594,588
February	594,588	-	-	3,536	598,124
March	598,124	-	-	3,557	601,681
April	601,681	-	-	3,579	605,260
May	605,260	-	-	3,600	608,860
June	608,860	-	-	3,621	612,481
July	612,481	-	-	3,643	616,124
August	616,124	-	-	3,664	619,789
September	619,789	-	-	3,686	623,475
October	623,475	-	-	3,708	627,183
November	627,183	-	-	3,730	630,913
December	630,913	-	-	3,752	634,666
2022 January	634,666	-	-	3,775	638,441
February	638,441	-	-	3,797	642,238
March	642,238	-	-	3,820	646,058
April	646,058	-	-	3,843	649,900
May	649,900	-	-	3,865	653,766
June	653,766	-	-	3,888	657,654
July	657,654	-	-	3,912	661,565
August	661,565	-	-	3,935	665,500
September	665,500	-	-	3,958	669,458
October	669,458	-	-	3,982	673,440
November	673,440	-	-	4,005	677,446
December	677,446	-	-	4,029	681,475
2023 January	681,475	-	19,480	1,048	663,043
February	663,043	-	19,480	1,020	644,583
March	644,583	-	19,480	992	626,094
April	626,094	-	19,480	964	607,578
May	607,578	-	19,480	936	589,034
June	589,034	-	19,480	908	570,462
July	570,462	-	19,480	880	551,861
August	551,861	-	19,480	852	533,233
September	533,233	-	19,480	824	514,576
October	514,576	-	19,480	795	495,890
November	495,890	-	19,480	767	477,177
December	477,177	-	19,480	738	458,435
			<b>Pro Forma Amort =</b>	<b>233,766</b>	

PAC/2000 -  
Table 5

Note:

1. Ref Exhibit PAC/1002/Cheung/275-276, correcting for deferral initiation date as proposed by Staff.
2. 2020 Interest rate in deferral period per approved WACC from UE-263. 2021 Interest rate in deferral period per approved WACC from UE-374.
3. Interest rate in amortization period per UM-1147, MBT Rate, approved January 14, 2022.

PacifiCorp  
Oregon General Rate Case - December 2023  
Deferral Amortization Schedules  
TB Flats - Amortization Summary

	<b>Amortization</b>
Base Period Amount (below)	-
Pro Forma Amount (below)	6,140,445
Adjustment:	<u>6,140,445</u>

Exhibit PAC/1002/Cheung/278

In-Service Date 7/26/2021

	Opening Bal.	Accrual <sup>1</sup>	Amortization	Interest <sup>2,3</sup>	Ending Bal.
2021 June	-	-	-	-	-
July		146,428	-	435	146,863
August	146,863	907,853	-	3,573	1,058,290
September	1,058,290	907,853	-	8,994	1,975,137
October	1,975,137	907,853	-	14,447	2,897,438
November	2,897,438	907,853	-	19,933	3,825,224
December	3,825,224	907,853	-	25,451	4,758,528
2022 January	4,758,528	907,853	-	31,002	5,697,384
February	5,697,384	907,853	-	36,586	6,641,823
March	6,641,823	907,853	-	42,203	7,591,879
April	7,591,879	907,853	-	47,854	8,547,586
May	8,547,586	907,853	-	53,538	9,508,978
June	9,508,978	907,853	-	59,256	10,476,087
July	10,476,087	1,153,419	-	65,738	11,695,244
August	11,695,244	1,153,419	-	72,989	12,921,652
September	12,921,652	1,153,419	-	80,284	14,155,355
October	14,155,355	1,153,419	-	87,621	15,396,395
November	15,396,395	1,153,419	-	95,003	16,644,816
December	16,644,816	1,153,419	-	102,428	17,900,662
2023 January	17,900,662	-	511,704	27,537	17,416,496
February	17,416,496	-	511,704	26,803	16,931,595
March	16,931,595	-	511,704	26,068	16,445,959
April	16,445,959	-	511,704	25,331	15,959,587
May	15,959,587	-	511,704	24,593	15,472,476
June	15,472,476	-	511,704	23,855	14,984,627
July	14,984,627	-	511,704	23,115	14,496,038
August	14,496,038	-	511,704	22,374	14,006,708
September	14,006,708	-	511,704	21,632	13,516,636
October	13,516,636	-	511,704	20,888	13,025,820
November	13,025,820	-	511,704	20,144	12,534,261
December	12,534,261	-	511,704	19,398	12,041,955
		<b>Pro Forma Amort =</b>	<b>6,140,445</b>		

Note:

1. Ref Exhibit PAC/1002/Cheung/278-279
2. 2021 Interest rate in deferral period per approved WACC from UE-374.
3. Interest rate in amortization period per UM-1147, MBT Rate, approved January 14, 2022.

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Deferral Amortization Schedules**  
**Pryor Mountain REC Sales Revenue Deferral**

**Amortization**

Base Period Amount (below) -  
 Pro Forma Amount (below) [REDACTED]  
 Adjustment: [REDACTED] Exhibit PAC/1002/Cheung/246

	Opening Bal.	Accrual <sup>1</sup>	Amortization	Interest <sup>2</sup>	Ending Bal.
2021 June	-	-	-	-	-
July	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
August	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
September	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
October	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
November	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
December	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
2022 January	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
February	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
March	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
April	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
May	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
June	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
July	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
August	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
September	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
October	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
November	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
December	[REDACTED]	[REDACTED]	-	[REDACTED]	[REDACTED]
2023 January	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
February	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
March	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
April	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
May	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
June	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
July	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
August	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
September	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
October	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
November	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
December	[REDACTED]	-	[REDACTED]	[REDACTED]	[REDACTED]
		<b>Pro Forma Amort =</b>			

**Note:**

1. Reflects accrued amounts through December 2022. Starting 1/1/2023, the Company is proposing including Oregon's share of forecasted Pryor Mountain REC Revenues in base rates.
2. Interest accrual at authorized rate of return during deferral period, and at current Modified Blended Treasury rate during amortization period.

	2021	
Auth. ROR	7.137%	Ref UE-374

	2022	
MBTR	1.820%	Ref UM-1147

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Deferral Amortization Schedules**  
**Cholla Unit 4 Property Taxes**

	<u><b>Amortization</b></u>	
Base Period Amount (below)	-	
Pro Forma Amount (below)	219,065	
Adjustment:	<u><u>219,065</u></u>	Exhibit PAC/1002/Cheung/272

	Opening Bal.	Amortization	Interest <sup>1</sup>	Ending Bal.
2022 December				639,589
2023 January	639,589	(18,255)	956	622,290
February	622,290	(18,255)	930	604,964
March	604,964	(18,255)	904	587,612
April	587,612	(18,255)	877	570,234
May	570,234	(18,255)	851	552,830
June	552,830	(18,255)	825	535,399
July	535,399	(18,255)	798	517,942
August	517,942	(18,255)	772	500,458
September	500,458	(18,255)	745	482,948
October	482,948	(18,255)	719	465,411
November	465,411	(18,255)	692	447,848
December	447,848	(18,255)	665	430,258
<b>Pro Forma Amort =</b>		<b>(219,065)</b>		

1. Interest accrual at current Modified Blended Treasury Rate during amortization period.

	2022
MBTR	1.820%

Ref UM-1147

**PacifiCorp**  
**Oregon General Rate Case - December 2023**  
**Deferral Amortization Schedules**  
**COVID-19 Deferral**

	<u><b>Amortization</b></u>
Base Period Amount (below)	-
Pro Forma Amount (below)	4,643,594
Adjustment:	<u><b>4,643,594</b></u>

	<b>Opening Bal.</b>	<b>Accrual<sup>1</sup></b>	<b>Amortization</b>	<b>Interest<sup>2</sup></b>	<b>Ending Bal.</b>
2020 September	-	5,982,332	-	4,537	5,986,869
October	5,986,869	-	-	9,080	5,995,949
November	5,995,949	-	-	9,094	6,005,042
December	6,005,042	(3,353,368)	-	6,565	2,658,239
2021 January	2,658,239	-	-	4,032	2,662,271
February	2,662,271	-	-	4,038	2,666,308
March	2,666,308	1,357,694	-	5,073	4,029,076
April	4,029,076	-	-	6,111	4,035,187
May	4,035,187	-	-	6,120	4,041,307
June	4,041,307	5,669,041	-	10,428	9,720,777
July	9,720,777	-	-	14,743	9,735,520
August	9,735,520	-	-	14,766	9,750,286
September	9,750,286	4,123,251	-	17,915	13,891,451
October	13,891,451	-	-	21,069	13,912,520
November	13,912,520	-	-	21,101	13,933,621
December	13,933,621	3,607,863	-	23,869	17,565,352
2022 January	17,565,352	-	-	26,641	17,591,993
February	17,591,993	-	-	26,681	17,618,674
March	17,618,674	-	-	26,722	17,645,396
April	17,645,396	-	-	26,762	17,672,158
May	17,672,158	-	-	26,803	17,698,961
June	17,698,961	-	-	26,843	17,725,804
July	17,725,804	-	-	26,884	17,752,688
August	17,752,688	-	-	26,925	17,779,613
September	17,779,613	-	-	26,966	17,806,579
October	17,806,579	-	-	27,007	17,833,586
November	17,833,586	-	-	27,048	17,860,633
December	17,860,633	-	-	27,089	17,887,722
2023 January	17,887,722	-	386,966	27,423	17,528,179
February	17,528,179	-	386,966	26,878	17,168,091
March	17,168,091	-	386,966	26,332	16,807,456
April	16,807,456	-	386,966	25,785	16,446,275
May	16,446,275	-	386,966	25,237	16,084,546
June	16,084,546	-	386,966	24,688	15,722,268
July	15,722,268	-	386,966	24,139	15,359,440
August	15,359,440	-	386,966	23,589	14,996,063
September	14,996,063	-	386,966	23,037	14,632,134
October	14,632,134	-	386,966	22,486	14,267,654
November	14,267,654	-	386,966	21,933	13,902,620
December	13,902,620	-	386,966	21,379	13,537,033
			<b>Pro Forma Amort =</b>	<b>4,643,594</b>	

Note:

1. Ref PacifiCorp quarterly COVID-deferral filings in Docket RE 185.
2. Interest rate in deferral & amortization period per UM-1147, MBT Rate, approved January 14, 2022

Docket No. UE 399  
Exhibit PAC/2005  
Witness: Sherona L. Cheung

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Sherona L. Cheung

UE 147 Environmental Regulatory Asset Adjustment

July 2022



**PacifiCorp  
Oregon General Rate Case March 2004  
Misc Rate Base**

PAGE

8.17

	<u>ACCOUNT</u>	<u>Type</u>	<u>TOTAL COMPANY</u>	<u>FACTOR</u>	<u>FACTOR %</u>	<u>OREGON ALLOCATED</u>	<u>SUMMARY REF#</u>
<b>Adjustment to Rate Base:</b>							
Misc Deferred Deibts-2003	186M	3	(335,182)	SE	28.141%	(94,325)	8.90
Misc Deferred Deibts-2003	186M	3	(5,126,471)	SG	28.636%	(1,467,998)	8.90
Trojan Unrecovered Plant	18222	3	(822,024)	TROJP	46.089%	(378,860)	8.90
Trojan Unrecovered Plant	18222	3	(1,196,558)	TROJD	47.545%	(568,902)	8.90
Environmental Clean-up	182M	3	(3,836,000)	SO	30.463%	(1,168,543)	8.89
Regulatory Assets	182M	3	(2,740,204)	WA	Situs	-	8.89
Regulatory Assets	182M	3	(6,921,482)	OR	Situs	(6,921,482)	8.89
Regulatory Assets	182M	3	(1,146,425)	SGCT	28.636%	(328,286)	8.89
Regulatory Assets	182M	3	(23,849,682)	UT	Situs	-	8.89
Regulatory Assets	182M	3	(158,869)	CA	Situs	-	8.89
Regulatory Assets	182M	3	(1,365,391)	ID	Situs	-	8.89
Regulatory Assets	182M	3	(4,455,611)	WYE	Situs	-	8.89
Regulatory Assets	182M	3	(916,940)	WYW	Situs	-	8.89
			<u>(52,870,839)</u>			<u>(10,928,396)</u>	
Misc Deferred Debits-2004	186M	3	(335,182)	SE	28.141%	(94,325)	8.90
Misc Deferred Debits-2004	186M	3	(3,186,991)	SG	28.636%	(912,615)	8.90
Trojan Unrecovered plant	18222	3	(822,024)	TROJP	46.089%	(378,860)	8.90
Trojan Unrecovered plant	18222	3	(1,196,558)	TROJD	47.545%	(568,902)	8.90
Environmental Clean up	182M	3	(3,836,000)	SO	30.463%	(1,168,543)	8.89
Regulatory Assets	182M	3	(2,740,204)	WA	Situs	-	8.89
Regulatory Assets	182M	3	(5,119,877)	OR	Situs	(5,119,877)	8.89
Regulatory Assets	182M	3	(1,146,425)	SGCT	28.636%	(328,286)	8.89
Regulatory Assets	182M	3	(14,675,699)	UT	Situs	-	8.89
Regulatory Assets	182M	3	(158,869)	CA	Situs	-	8.89
Regulatory Assets	182M	3	(1,536,083)	ID	Situs	-	8.89
Regulatory Assets	182M	3	(3,040,962)	WYE	Situs	-	8.89
Regulatory Assets	182M	3	(538,087)	WYW	Situs	-	8.89
			<u>(38,332,961)</u>			<u>(8,571,408)</u>	

**Description of Adjustment:**

This adjustment reflects the amortization for miscellaneous deferred debits, Trojan investment, environmental remediation projects and regulatory assets.

FERC	SAP	Description	Ending Balance		Amortization		Ending Balance		Amortization		Ending Balance		Allocation Factor
			03/31/02	03/31/03	2003	2004	03/31/03	2004	03/31/04				
1865	134200	Deferred Longwall Costs	1,033,300	1,033,300	-	-	1,033,300	-	-	1,033,300	SE		
1865	184414	DEFERRED COAL COSTS - WYODAK SETTLEMENT	6,955,023	6,619,841	(335,182)	(335,182)	6,619,841	(335,182)	(335,182)	6,284,659	SE		
1868	184413	Hayden Fuel Contract Negotiation Costs	1,204,847	849,897	(355,000)	(355,000)	849,897	(355,000)	(355,000)	494,897	SG		
1868	185010	Mill Fork Coal Lease	25,800,343	25,800,343	-	-	25,800,343	-	-	25,800,343	SE		
1868	185306	TGS BUYOUT	275,944	260,542	(15,402)	(15,402)	260,542	(15,402)	(15,402)	245,141	SG		
1868	185309	LAKEVIEW BUYOUT	295,745	252,466	(43,280)	(43,280)	252,466	(43,280)	(43,280)	209,186	SG		
1868	185310	BUFFALO SETTLEMENT	120,471	75,294	(45,177)	(45,177)	75,294	(45,177)	(45,177)	30,118	SG		
1868	185311	JOSEPH SETTLEMENT	2,175,196	2,037,815	(137,381)	(137,381)	2,037,815	(137,381)	(137,381)	1,900,434	SG		
1868	185312	TRI-STATE FIRM WHEELING	2,825,280	1,765,800	(1,059,480)	(1,059,480)	1,765,800	(1,059,480)	(1,059,480)	706,320	SG		
1868	185313	MEAD-PHOENIX-AVAILABILITY & TRANS CHARGE	17,062,160	16,684,400	(377,760)	(377,760)	16,684,400	(377,760)	(377,760)	16,306,640	SG		
1868	185318	BOGUS CREEK SETTLEMENT	(472,000)	(472,000)	-	-	(472,000)	-	-	(472,000)	SG		
1868	185327	FIRTH COGENERATION BUYOUT	2,109,380	1,665,300	(444,080)	(444,080)	1,665,300	(444,080)	(444,080)	1,221,220	SG		
1868	185334	HERMISTON SWAP	8,273,448	7,733,875	(539,573)	(539,573)	7,733,875	(539,573)	(539,573)	7,194,303	SG		
1868	185335	LACOMB IRRIGATION	906,780	861,060	(45,720)	(45,720)	861,060	(45,720)	(45,720)	815,340	SG		
1868	185336	BOGUS CREEK	1,561,760	1,520,480	(41,280)	(41,280)	1,520,480	(41,280)	(41,280)	1,479,200	SG		
1868	185342	JIM BOYD HYDRO BUYOUT	952,848	869,988	(82,860)	(82,860)	869,988	(82,860)	(82,860)	787,128	SG		
1869	185333	OPTION PURCHASES	1,939,480	(1,939,480)	(1,939,480)	(1,939,480)	-	-	-	-	SG		
18222	185801	UNRECOVD PLANT - TROJAN-DR	15,289,421	15,289,421	-	-	15,289,421	-	-	15,289,421	TROJIP		
18222	185802	UNRECOVD PLANT - TROJAN-CR-DEP'N	(8,028,210)	(8,850,233)	(822,024)	(822,024)	(8,850,233)	(822,024)	(822,024)	(9,672,257)	TROJIP		
18222	185803	UNRECOVD PLANT - TROJAN-DECOM-DR	17,980,541	17,980,541	-	-	17,980,541	-	-	17,980,541	TROJID		
18222	185804	UNRECOVD PLANT - TROJAN-DECOM-CR	(7,410,948)	(8,607,506)	(1,196,558)	(1,196,558)	(8,607,506)	(1,196,558)	(1,196,558)	(9,804,063)	TROJID		
22842	284910	Decommissioning Liability	(8,848,566)	(8,848,566)	-	-	(8,848,566)	-	-	(8,848,566)	TROJID		
182302	187001	IDAI Costs - No. Ca Direct Access	1,665,523	1,665,523	-	-	1,665,523	-	-	1,665,523	CA		
182391	188010	ENVIRONMENTAL COST	11,073,538	7,237,538	(3,836,000)	(3,836,000)	7,237,538	(3,836,000)	(3,836,000)	3,401,538	SO		
182399	185340	TRANSITION COSTS - WA	14,727,293	12,039,276	(2,688,016)	(2,688,016)	12,039,276	(2,688,016)	(2,688,016)	9,351,260	WA		
182399	187041	CHOLLA FUEL CONTRACT NEGOTIATIONS	148,929	148,929	-	-	148,929	-	-	148,929	SE		
182399	187050	CHOLLA PLANT TRANSACTION COSTS	17,210,518	16,064,093	(1,146,425)	(1,146,425)	16,064,093	(1,146,425)	(1,146,425)	14,917,668	SGCT		
182399	187051	WASHINGTON COLSTRIP #3 REGULATORY ASSET	982,904	(52,188)	(52,188)	(52,188)	930,716	(52,188)	(52,188)	878,528	WA		
182399	187100	97 GLENROCK MINE RECLAMATION UT	1,725,590	(1,725,590)	(1,725,590)	(1,725,590)	-	-	-	-	UT		
182399	187101	98-00 Y2K EXPENSE UT	73,302	(73,302)	(73,302)	(73,302)	-	-	-	-	UT		
182399	187102	97 COMPUTER MAINFRAME WRITEDOWN UT	632,456	(632,456)	(632,456)	(632,456)	-	-	-	-	UT		
182399	187103	98 EARLY RETIREMENT UT	2,762,265	(2,762,265)	(2,762,265)	(2,762,265)	-	-	-	-	UT		
182399	187106	BSIP/SAP - UT	2,772,975	504,061	(2,268,913)	(2,268,913)	504,061	(504,061)	(504,061)	-	UT		
182399	187107	GLENROCK MINE EXCLUDING RECLAMATION - UT	9,917,619	8,615,220	(1,302,399)	(1,302,399)	8,615,220	(1,302,399)	(1,302,399)	7,312,820	UT		
182399	187108	SOFTWARE WRITE DOWN 1997 - UT	1,285,909	771,545	(514,363)	(514,363)	771,545	(514,363)	(514,363)	257,182	UT		
182399	187109	SOFTWARE WRITE DOWN 1999 - UT	917,556	550,534	(367,023)	(367,023)	550,534	(367,023)	(367,023)	183,511	UT		
182399	187110	TRANSITION TEAM COSTS - UT	1,214,761	728,857	(485,905)	(485,905)	728,857	(485,905)	(485,905)	242,952	UT		
182399	187201	MAY 2000 TRANSITION PLAN COSTS - CA	4,912,104	4,753,235	(158,869)	(158,869)	4,753,235	(158,869)	(158,869)	4,594,367	CA		
182399	187202	MAY 2000 TRANSITION PLAN COSTS - ID	5,666,398	4,301,007	(1,365,391)	(1,365,391)	4,301,007	(1,365,391)	(1,365,391)	2,935,616	ID		
182399	187203	MAY 2000 TRANSITION PLAN COSTS - OR	44,467,244	37,545,762	(6,921,482)	(6,921,482)	37,545,762	(6,921,482)	(6,921,482)	32,425,886	OR		
182399	187204	MAY 2000 TRANSITION PLAN COSTS - UT	40,555,344	26,837,878	(13,717,466)	(13,717,466)	26,837,878	(13,717,466)	(13,717,466)	15,335,930	UT		
182399	187205	MAY 2000 TRANSITION PLAN COSTS - WYP	11,714,134	8,109,232	(3,604,902)	(3,604,902)	8,109,232	(3,604,902)	(3,604,902)	5,068,270	WYP		
182399	187206	MAY 2000 TRANSITION PLAN COSTS - WYU	2,072,774	1,434,900	(637,874)	(637,874)	1,434,900	(637,874)	(637,874)	896,812	WYU		



Docket No. UE 399  
Exhibit PAC/2006  
Witness: Sherona L. Cheung

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Sherona L. Cheung  
December 2021 Regulatory Assets & Liabilities Schedule

July 2022

GL Acct	GL Description	Total Company Balance as of Dec 31, 2021	The Oregon Order that gave rise to the asset or liability account	Oregon-allocated Balance as of Dec 31, 2021	Included in 2021 Oregon ROO	Balancing Account
186035	DSM Reg Asset - Balancing Acct - OR	302,869.15	UE 326 - Advice 16 07	-	N	Yes
186820	Reg Asset-Deer Creek Mine ARO	6,607,426.34	UM 1712 - Order No. 15-161	1,664,222.05	N	No
186825	Reg Asset-Deer Creek Mine M&S	4,491,692.24	"	1,131,329.04	N	No
186826	Reg Asset-Deer Creek-Prepaid Royalties	842,957.20	"	212,316.85	N	No
186828	Reg Asset-Deer Creek-Recovery Royalties	14,848,926.30	"	3,740,020.59	N	No
186830	Reg Asset-Deer Creek-Union Suppl Ben	1,611,812.47	"	405,969.54	N	No
186833	Reg Asset-Deer Creek-Nonunion Severance	2,770,291.93	"	697,757.44	N	No
186835	Reg Asset-Deer Creek-Misc Closure Costs	45,111,997.92	"	11,362,424.31	N	No
186836	Contra RA-DCM Closure-To Joint Owners	(3,149,342.11)	"	(793,229.36)	N	No
186837	Contra RA-DCM Closure-Amortz & Oth Adjs	(41,566,104.61)	"	-	N	No
186839	Reg Asset-Deer Creek-Tax Flow-Through	2,978,683.00	"	750,245.21	N	No
186853	Contra Reg Asset-Deer Creek Closure-OR	(7,459,579.37)	"	(7,459,579.37)	N	No
186859	Contra RegA-DCM Closure-DisAllow-OR	(612,294.64)	"	-	N	No
186881	Reg Asset-UMWA Pension Trust Oblig	115,119,099.34	"	28,995,214	N	No
186886	Contra RA-UMWA Pens W/D-To Joint Owners	(4,752,558.65)	"	-	N	No
186901	FAS 133 Derivative Net Regulatory Asset	-	UM 1019 - Order No. 01-540	-	N	No
187017	Reg Asset - FAS 158 Pension Liab. Adj.	274,718,062.73	UE 03-233, UM-1073	76,893,903.34	N	No
187035	Reg Asset - Solar ITC Basis Adjustment	403,004.31	There is no regulatory impact due to the offsetting nature in the originating FERC accounts.	-	N	No
187230	RegA - Oregon OCAT Expense Deferral	640,515.85	UM 2036, UE 367/Advice No. 19-015 - Order No. 20-028	-	N	Yes
187231	Reg Asset - Oregon Metro BIT	25,155.99	Docket # UM 2138, Order 21-061	-	N	No
187251	BPA Oregon Balancing Account	3,611,569.25	BPA/PacifiCorp contract #01PB-12229, dated 5/23/01	-	N	Yes
187338	Reg Asset - Carbon Plt Decom/Inventory	(179,487.00)	UE-374 - Order No. 20-473	(179,487.00)	Y	No
187338	Reg Asset - Carbon Plt Decom/Inventory	3,448,669.39	UE-374 - Order No. 20-473	929,310.05	Y	No
187354	RegA-OR 2020 GRC-Meters Replcd by AMI	13,863,239.50	UE-374 - Order No. 20-473	-	N	No
187355	Reg Asset - Post-Employment Costs	(8,555,713.00)	UM 1400 - Order No. 08-598	-	N	No
187361	Reg A-OR-COVID-19 Bill Assistance Prog	10,819,672.56	Docket RA3 - UM 2114	-	N	No
187379	Reg Asset-OR Solar Feed-In Tariff 2019	-	UM 1483 (8), Order No. 18-227	-	N	Yes
187382	Reg Asset - OR Solar Feed-In Tariff 2020	(105,871.61)	UM 1483 (9), Order No. 19-230	-	N	Yes
187386	Reg Asset - OR Solar Feed-In Tariff 2021	4,064,288.59	UM 1483 (10), Order No. 20-196	-	N	Yes
187392	Reg Asset-OR Solar Feed-In Tariff 2022	709,812.63	UM 1483 (11), Order No. 21-197	-	N	Yes
187420	RegA - OR Community Solar	1,946,253.75	AR 603, Order No. 17-232 UM 1981, Order No. 18-478	-	N	Yes
187611	Reg Asset - Pension Settlement - OR	4,453,167.19	OR GRC - UE 374; Deferral Application UM 2185	-	N	No
187621	Reg Asset - FAS 158 Post-Retirement Lia	(27,592,349.25)	Same as SAP 187017 above.	(7,723,130.45)	Y	No
187660	RegA-OR Transp Electrification Pilot	5,742,846.56	UM 1810 - Program application UM 1964 - Deferred Actg UM/ADV TBD - Amortization	-	N	Yes
187665	RegA-OR Residential Charging Pilot	-	Docket 1288; Adv No. 21-016	-	N	No
187667	RegA-OR Outreach and Research Pilot	4,880.00	Docket 1288; Adv No. 21-016	-	N	No
187886	Reg Asset-OR RPS Compliance Purchases	(287,529.76)	Compliance Report Pursuant to ORS 469A.170 UM--1147 and UG 221	-	N	Yes
187940	Reg Asset - Frozen MTM	36,447,683.00	UM 1019 - Order No. 01-540	-	N	No
187952	Oregon Deferred Intervenor Funding Gran	2,541,939.46	Various commission orders granting intervenor funding	-	N	No
187957	Deferred OR Independent Evaluator Fees	38,522.51	Various commission orders granting intervenor funding	-	N	No
188000	Reg Asset-Accrued Environmental Cost	72,927,837.73	FASB Accounting Standards Codification Topic 410-30 - "Asset Retirement and Environmental Obligations - Environmental Obligations".	-	N	No
188010	Reg Asset-Environmental Spend	43,481,115.98	OR - order on GRC UE-147 approved all regulatory assets as recorded and not specifically objected to - environmental costs was included and is thus considered accepted	12,170,414.63	Y	No
288021	Reg Liab-FAS 158 Post-Retirement	(26,296,471.27)	GAAP mandated account - no document number associated.	(7,360,412.71)	Y	No
288083	Reg Liab - Cholla Decom - OR	(8,357,895.03)	UE-374 - Order No. 20-473	(8,357,895.03)	Y	No
288101	Reg Liab - Inc Tax Prop Flowthrough	254,837,903.44	This item was presented to the various state commissions in 1993, but the commissions would not rule on this since there is no regulatory impact due to the offsetting nature in the originating FERC accounts.	-	N	No
288102	Reg Liab - Inc Tax Prop Flowthrough-PMI	(2,590,607.51)	This item relates solely to the change in federal income tax rate from 35% to 21%.	-	N	No
288109	Reg Liab - Income Tax on ITC	(674,937.70)	This item was presented to the various state commissions in 1993, but the commissions would not rule on this since there is no regulatory impact due to the offsetting nature in the originating FERC accounts.	-	N	No
288114	Reg Liability - OR Gain on Sale of Asse	2,175,917.43	Order No. 17-149 (commission fees), Order No. 14-180 (amortization), Order No. 01-787 (track property sales gain/losses)	-	N	Yes
288150	Reg Liability - Blue Sky Program - OR	(2,238,077.91)	Advice No. 07-009	-	N	Yes
288165	Reg Liab - OR Energy Conservation Charg	(3,879,267.89)	Advice No. 07-022, Schedule 297	-	N	Yes
288190	Reg Liab - Oregon Clean Fuels Program	(4,969,428.10)	Docket No. UM 1826, Order No. 18-376 Represents a balancing account for the use of revenues from utility participation in DEQ's Oregon Clean Fuels Program (OAR 860-001-01802)	-	N	Yes
288191	RegL - OR Pryor Mtn REC	(142,788.04)	Docket UM-2167	-	N	No
288232	Reg Liab - OR 2017 FERC Rate True-Up	(7,940,350.30)	Docket No. ER13-64-000, 143 FERC 61.151; UM-1050, Order 16-319.	-	N	No
288283	Reg Liab-Excess Income Tax Deferral-OR	(6,595,554.01)	Docket UM-1917	-	N	No

GL Acct	GL Description	Total Company Balance as of Dec 31, 2021	The Oregon Order that gave rise to the asset or liability account	Oregon-allocated Balance as of Dec 31, 2021	Included in 2021 Oregon ROO	Balancing Account
288401	Reg Liability - OR Regulatory Asset/Lia	453,742.95	UE 170 - Order No. 05-1050.	-	N	Yes
288405	Reg Liab-OR Direct Access 5 yr Opt Out	(6,807,763.64)	OPUC Advice filing No. 15-004 UE 267, Compliance Filing. Docket UE 267, Order 15-060, dated Feb 24,2015	-	N	No
288406	Reg L - OR Bridger Mine Accel Depr&Reclm	(3,639,438.72)	Docket UE-374, UM 1968	(3,639,438.72)	Y	No
288412	Reg Liab - Depr Decrease Deferral - OR	(5,357,364.53)	Depreciation rates from the levels approved by the Commission in Order No. 13-347. The following was approved: reauthorization of deferred accounting related to reduced depreciation expense (UM 1682). 2016 approval to continue in Docket No. UM 1682, Order 16-097.	-	N	No
288933	Reg Liab - Protected PP&E EDIT - OR	(364,860,240.58)	Docket UM-1917	(364,860,240.58)	Y	No
288943	Reg Liab - Prot PP&E EDIT Amort - OR	(1,785.00)	Docket UM-1917	(1,785.00)	Y	No

Docket No. UE 399  
Exhibit PAC/2007  
Witness: Sherona L. Cheung

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Exhibit Accompanying Reply Testimony of Sherona L. Cheung

PacifiCorp's response to OPUC data request 364

July 2022

UE 399 / PacifiCorp  
April 28, 2022  
OPUC Data Request 362

## **OPUC Data Request 362**

**Advertising** - Please explain why in response to SDR 104 (f) it is stated, “The following programs did include advertising during Test Year [Blue Sky and Demand-Side Management Programs],” yet under the Blue Sky description it is stated, “The Company does not have budgeted advertising expenditures for this program.”

### **Response to OPUC Data Request 362**

The Company’s response to Standard Data Request – OPUC 104 subpart (f) mistakenly omitted the word “not”. The response to Standard Data Request - OPUC 104 subpart (f) should read:

“The following programs do *not* include advertising during the Test Year. Funds for these programs are collected through a separate tariff and not part of base rates.”

The Company does not budget advertising expenditures at the level of detail requested.



Docket No. UE 399  
Exhibit PAC/2100  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith

July 2022

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**ATTACHED EXHIBITS**

Exhibit PAC/2101—Updated Unbundled Results of Operations - Summary and Detail

Exhibit PAC/2102—Updated Functionalized Oregon Results of Operations Report

Exhibit PAC/2103—Updated Oregon Marginal Cost of Service Study Summary

Exhibit PAC/2104—Updated Unbundled Revenue Requirement Allocation

Exhibit PAC/2105—Updated Target Functionalized Revenues and Billing Determinants

Exhibit PAC/2106—Updated Estimated Effect of Proposed Rates and Proposed Adjustment  
Schedules

Exhibit PAC/2107—Proposed Adjustment Schedule Rates for Deferred Amounts

Exhibit PAC/2108—Washington Renewable Future Peak Credit Method

1 **Q. Are you the same Robert M. Meredith that previously provided direct testimony**  
2 **in this case on behalf of PacifiCorp d/b/a Pacific Power (PacifiCorp or the**  
3 **Company)?**

4 A. Yes.

5 **I. PURPOSE AND SUMMARY**

6 **Q. What is the purpose of your reply testimony?**

7 A. My reply testimony includes revised exhibits to reflect changes in the Oregon Results  
8 of Operations contained in the reply testimony of Company witness Ms. Sherona L.  
9 Cheung. Additionally, I respond to the testimonies of Staff of the Public Utility  
10 Commission of Oregon (Staff) witnesses Dr. Curtis Dlouhy and Mr. John L. Fox,  
11 Oregon Citizens' Utility Board (CUB) witness Mr. William Gehrke, Klamath Water  
12 User Association and the Oregon Farm Bureau Federation (KWUA/OFBF) witness  
13 Mr. Lloyd C. Reed, Alliance of Western Energy Users (AWEC) witness Dr. Lance  
14 Kaufman, and Small Business Utility Advocates (SBUA) witness Mr. William A.  
15 Steele. My responses to the witnesses are organized by topic.

16 **II. UPDATED EXHIBITS**

17 **Q. Have you prepared any updates to the exhibits filed with your reply testimony?**

18 A. Yes. Exhibits PAC/2101 through 2106 are updates to Exhibits PAC/1102, 1103,  
19 1106, 1107, 1109, and 1110. The revised exhibits reflect changes in the Oregon  
20 Results of Operations as presented in Company witness Ms. Cheung's reply  
21 testimony and exhibits. My updated exhibits also reflect the cap to limit the base  
22 revenue requirement increase to \$76.7 million as described in the reply testimony of  
23 Ms. Joelle R. Steward and Ms. Cheung. PacifiCorp's proposed base rate increase,

1 shown on Page 2 of Exhibit PAC/2105 and Page 1 of Exhibit PAC/2106, is consistent  
2 with the proposed cap. Additionally, the marginal cost of service study was revised  
3 to use a three-year average of monthly substation peaks, instead of peaks from a  
4 single year, to reduce volatility. Revised forecast irrigation annual bills and energy  
5 sales were incorporated into the marginal cost of service study and pricing model.  
6 The Company revised its present revenues to incorporate the paperless bill credit that  
7 was approved by the Commission in the Company's last general rate case, docket UE  
8 374 (2021 Rate Case). Finally, net rates reflect the development of additional  
9 adjustments to collect amounts related to deferrals. The overall net rate increase  
10 shown in Exhibit PAC/2106 is \$86.3 million or 6.9 percent. I discuss all these  
11 changes in more detail later in my testimony.

12 **Q. How has the Company limited the base revenue requirement to the cap of**  
13 **\$76.7 million?**

14 A. The Company has applied a reduction to the overall revenue requirement as part of  
15 the cost of service study, similar to how revenues from other sources such as Annual  
16 Guarantee Adjustment (AGA) related to line extensions are removed before revenue  
17 requirement is allocated to the rate classes. This adjustment of \$9.7 million can be  
18 seen in Exhibit PAC/2104, Page 3.

19 **Q. Please describe the revision of present revenues to incorporate the paperless bill**  
20 **credit.**

21 A. In the 2021 Rate Case, the reduction in revenue from the paperless bill credit was  
22 reflected as an adjustment to Federal Energy Regulatory Commission (FERC)  
23 account 451 – Miscellaneous Electric Revenue in the revenue requirement model.

1           However, when the Company implemented the credit, it was determined that it should  
2           be accounted for as standard retail revenue. The credit was therefore reflected in the  
3           results for FERC accounts 440 – Residential Sales, 442 – Commercial and Industrial  
4           Sales, and 444 – Public Street and Highway Lighting. Accordingly, it was not  
5           included in the Company’s revenue forecast for the calendar year 2023 test period  
6           that was provided in its initial filing for this proceeding. Properly accounting for the  
7           correction decreases present revenue by about \$2.1 million.

8       **Q.    Please describe the proposed adjustment schedules to collect the approximate**  
9       **\$12.1 million annual amortization amount related to the deferrals as discussed in**  
10      **the testimony of Ms. Cheung.**

11     A.    The Company proposes to split the annual amount into two parts for amortization.  
12           Deferral amounts related to Cedar Springs II and TB Flats would be collected through  
13           an increase to the existing Schedule 203, Renewable Resource Deferral Supply  
14           Service Adjustment rates. Schedule 203 is the appropriate mechanism for recovery of  
15           these deferred costs related to renewable resources. The Company proposes to collect  
16           the remainder of the deferred amounts through a new adjustment Schedule 192,  
17           Deferred Accounting Adjustment.

18      **Q.    Have you prepared an exhibit which shows the calculation of the proposed**  
19      **adjustment schedule rates?**

20     A.    Yes. Exhibit PAC/2107 shows the proposed rate spread and rates for each of the two  
21           proposed adjustment schedules. Page 1 of the exhibit shows the calculation of the  
22           proposed change to Schedule 203. The proposed rates will collect approximately  
23           \$6.4 million additional dollars on an annual basis, consistent with the proposed

1 annual collection amount associated with Cedar Springs II and TB Flats shown in  
2 Ms. Cheung's Confidential Exhibit PAC/2005. Rate spread for these generation-  
3 based costs is the generation rate spread proposed in this case out of the cost of  
4 service study. The existing applicability for Schedule 203 will continue to apply to  
5 these proposed rates.

6 Page 2 of Exhibit PAC/2107 shows the calculation of the proposed Schedule  
7 192, Deferred Accounting Adjustment to collect the remainder of the proposed  
8 deferred amounts. The Company proposes an equal percentage rate spread collected  
9 through kilowatt-hour (kWh) based rates which apply to all customers. The proposed  
10 schedule would collect approximately \$5.7 million on an annual basis, consistent with  
11 the proposed remaining annual collection amount shown in Ms. Cheung's  
12 Confidential Exhibit PAC/2005.

13 **Q. Are you including updated tariffs at this time?**

14 A. No. The Company will file all necessary updated tariffs through a compliance filing  
15 at the conclusion of this case.

16 **III. RESPONSE TO PARTIES' OPENING TESTIMONY**

17 **Q. How do you organize your response to parties' opening testimony?**

18 A. I organize my response by topic, first addressing issues regarding the marginal cost of  
19 service study, and then addressing pricing-related matters. My lack of comments on  
20 any of the parties' testimony should not be interpreted as support or agreement.

1           **A.     Marginal Cost of Generation**

2           **Q.     Both Staff witness Dr. Dlouhy and AWEC witness Dr. Kaufman advise that the**  
3           **Company’s marginal cost of service study should rely upon the cost of new**  
4           **renewable and storage resources to determine the marginal cost of energy and**  
5           **capacity instead of natural gas-fired thermal resources.<sup>1</sup> Do you think that it is**  
6           **appropriate to incorporate such a change at this time?**

7           A.     No. While I agree that non-emitting resources reflect the future of PacifiCorp’s  
8           portfolio, it has been the Company’s practice to base marginal generation costs on the  
9           same proxy generation units that are utilized to estimate avoided costs for qualified  
10          facilities (QF). Presently, both the Company’s avoided cost calculations and  
11          marginal cost of service studies rely upon the same equivalent peaker methodology—  
12          where the costs of a combined cycle combustion turbine (CCCT) and simple cycle  
13          combustion turbine (SCCT) are examined. This is reasonable, because it creates a  
14          useful symmetry between the incremental addition of a unit of energy or a unit of  
15          capacity for both marginal cost of service and avoided cost analyses.

16                   Not only is it reasonable to align these analyses, it is also unclear what would  
17          be gained from adopting Dr. Dlouhy’s renewable proxy units for PacifiCorp’s  
18          marginal cost of service analyses. In fact, Dr. Dlouhy concedes that “(i)n practice,  
19          the end results are very similar whether my revisions or the Company’s filed marginal  
20          cost study is used.”<sup>2</sup>

21                   If the Commission approves a different methodology for avoided costs in  
22          future proceedings, it could then determine whether it would be appropriate to modify

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<sup>1</sup> See Staff/700, Dlouhy/3-11 and AWEC/200, Kaufman/3-6.

<sup>2</sup> See Staff/700, Dlouhy/16.

1 the requirements for utility marginal cost of service studies. Until that time, the  
2 Company believes that aligning the two methodologies provides important benefits.

3 **Q. If the Commission were to require the Company to base its marginal cost of**  
4 **generation on renewable and storage resources, do you have any concerns with**  
5 **the way that Staff calculated the marginal cost of energy and capacity?**

6 A. Yes, I have two concerns. First, Dr. Dlouhy ascribes the capacity contribution  
7 directly to the cost of renewable resources, proceeds to remove this component, and  
8 then deems the remainder to be what should be used for the marginal cost of energy.  
9 This is incorrect because capacity contributions do not measure the cost that is being  
10 used to serve capacity, but rather measure the proportion of nameplate capacity that  
11 can be relied upon to serve peak load. A more correct calculation would apply the  
12 capacity contribution to the cost of storage with the same nameplate capacity, and  
13 then deduct that cost from the cost of the renewable resource to determine the  
14 remaining energy-related cost component.

15 A second concern is that Dr. Dlouhy's method utilizes all of the renewable  
16 and storage resources in the preferred portfolio. I believe this method requires an  
17 unnecessary level of complexity that makes it challenging for stakeholders to review  
18 all of the inputs. This concern is heightened when any of the required information  
19 needs to be considered confidential.

20 **Q. If the Commission would like to modify PacifiCorp's marginal cost analyses, do**  
21 **you have any recommendations for methodologies it should consider?**

22 A. Yes. If the Commission would like to modify PacifiCorp's marginal cost analyses, it  
23 should instead draw from Washington state, where the Washington Utilities and



1 Transportation Commission recently adopted the Renewable Future Peak Credit  
2 Method for electric cost of service studies. I recommend that the Commission  
3 consider this well-vetted methodology if it seeks to make a change in the  
4 methodology to reflect a future without thermal resource additions. Exhibit  
5 PAC/2108 shows the calculation of the Renewable Future Peak Credit Method that  
6 the Company used in its last general rate case in Washington. To update this  
7 information for the instant proceeding, the values would need to be expressed in the  
8 appropriate units and the costs would need to be updated for the Company's most  
9 recent integrated resource plan (IRP). The Company would be happy to help Staff  
10 and other parties with those calculations or to hold a workshop to further explore  
11 methodologies before the Company's next general rate case.

12 **B. Marginal Cost of Distribution**

13 **Q. KWUA/OFBF witness Mr. Reed points out that the weighted distribution peaks**  
14 **for the irrigation class increased by 88.1 percent relative to the Company 2021**  
15 **Rate Case.<sup>3</sup> What is the reason for this large increase?**

16 A. For the calculation of marginal distribution costs, the monthly class distribution  
17 system coincident peaks are weighted by the capacity of substations that peak every  
18 month. The test period for the instant proceeding included the historic heat dome  
19 event that brought record temperatures to the Pacific Northwest during June 2021. As  
20 a result, the substation capacity peak weighting factor used for June in this rate case  
21 was 69.7 percent. This compares to the 2021 Rate Case which only had a 5.8 percent  
22 weighting factor for June. Consequently, the weighted distribution peaks for the

---

<sup>3</sup> See KWUA/OFBF/100, Reed/20-24.

1 irrigation class were much higher since irrigation customers predominantly use power  
2 during the summer months.

3 **Q. Has the Company modified its marginal cost of service study to balance out the**  
4 **weather-related volatility of substation peaks?**

5 A. Yes. To smooth out the seasonal volatility of the heat dome event, the Company  
6 proposes using a three-year average of substation peaks for weighting. This change,  
7 along with modifying loads to reflect the updated forecast energy sales for the  
8 irrigation class that I discuss later in my testimony, results in the weighted irrigation  
9 distribution system coincident peaks increasing by 26 percent instead of by 88 percent  
10 compared to PacifiCorp's previous rate case. I do not recommend using the  
11 adjustment to distribution loads that Mr. Reed recommends because it simply makes  
12 an arbitrary adjustment to class loads.

13 **Q. Staff witness Dr. Dlouhy contends that billing, metering, and communications**  
14 **costs should not be allocated to customer charges. Please summarize his**  
15 **arguments.**

16 A. He claims that while these costs may have been appropriate to allocate to customer  
17 charges in the past, it is no longer appropriate to do so, since smart meters can be  
18 used to enable more advanced rate designs and demand response. He reasons that  
19 "many of these costs are not purely customer costs, but also serve other purposes in  
20 the Company's system." Although he makes no adjustment to the marginal cost of  
21 service study, his opinion informs his recommendation on residential rate design.<sup>4</sup>

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<sup>4</sup> See Staff/700, Dlouhy/12,13.

1 **Q. Do you agree with Dr. Dlouhy?**

2 A. No. The logic behind the argument is that advanced metering infrastructure (AMI)  
3 can be used for more advanced rate designs which can benefit the grid, and some  
4 portion of their cost should therefore be directed away from the customer  
5 classification towards energy and demand. It is important to consider though that  
6 metering technologies that enable more sophisticated rate designs are not something  
7 new to the utility industry. For many decades, larger non-residential customers have  
8 had more expensive meters capable of measuring demand that residential and smaller  
9 non-residential customers have not had. AMI, like other metering equipment,  
10 ultimately enables a customer's usage to be measured. If it enables more advanced  
11 rate designs that help the utility lower its costs of supplying and delivering energy,  
12 the customer participating in that rate design will benefit in the form of bill savings,  
13 where rates are designed properly. The benefits of such rate designs therefore accrue  
14 to the individual customer and the metering is therefore appropriately considered  
15 customer-related.

16 **C. Treatment of Wildfire Mitigation and Vegetation Management Costs in**  
17 **the Marginal Cost of Service Study**

18 **Q. What issues does KWUA/OFBF witness Mr. Reed raise with respect to the**  
19 **treatment of Wildfire Mitigation and Vegetation Management in the marginal**  
20 **cost of service study?**

21 A. Mr. Reed asserts that allocating Wildfire Mitigation and Vegetation Management  
22 costs to the distribution function is not reasonable because the majority of the  
23 Company's irrigation loads are located in flat, open areas as opposed to densely  
24 forested areas, and the Company's study does not take into account these

1 characteristics when developing marginal cost. Mr. Reed concludes that Wildfire  
2 Mitigation and Vegetation Management costs are over-allocated to irrigation  
3 customers, and he recommends that a different set of allocation factors be used for  
4 these costs which takes into consideration locational topography of the infrastructure  
5 that is targeted for these measures.<sup>5</sup>

6 **Q. Do you think that Mr. Reed presents compelling evidence that Wildfire**  
7 **Mitigation and Vegetation Management costs are assigned unfairly in the**  
8 **marginal cost of service study?**

9 A. No. Marginal distribution costs are generally higher for irrigation customers in the  
10 Company's cost of service model because the model incorporates the geographic  
11 characteristic of distance from substation, and irrigators are more likely to be located  
12 in remote areas. Simply because irrigators are often located in more open and less  
13 wooded locations does not mean that Wildfire Mitigation and Vegetation  
14 Management costs are disproportionately less on the lines serving them as opposed to  
15 any other customer class. For example, sometimes distribution lines must traverse  
16 wooded areas before they can reach a particular irrigation customer. It may also be  
17 the case that more remote service locations enjoy the greatest benefits from Wildfire  
18 Mitigation and Vegetation Management because they are more likely to be impacted  
19 by a wildfire. Ultimately Mr. Reed's assertions are anecdotal and lack support.

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<sup>5</sup> See KWUA/OFBF/100, Reed/16-20.

1 **Q. After changing the substation peak input to a three-year average in the marginal**  
 2 **cost of service study as described earlier in your testimony, do you think that the**  
 3 **increase in distribution function revenue requirement is disproportionately**  
 4 **impacting the irrigation class more than any other?**

5 **A.** No. Comparing the marginal cost of service study that was filed in the 2021 Rate  
 6 Case to the marginal cost study being filed with reply testimony in the instant  
 7 proceeding confirms that the distribution revenue requirement increase is  
 8 proportionately less for irrigators than for the rest of the Company’s customers.  
 9 Table 1 shows how distribution revenue requirement for the irrigation class changed  
 10 from the last general rate case to this general rate case, and how that change compares  
 11 to the overall distribution revenue requirement change for all customers.

12 **Table 1: Distribution Revenue Requirement Compared to 2021 Rate Case**

<b>2021 Rate Case Direct</b>	<b>Distribution Function Revenue Requirement (\$000)</b>		
	<b>MWh</b>	<b>\$/MWh</b>	
Total	\$276,270	13,374,494	\$20.66
Irrigation	\$10,915	221,554	\$49.26

<b>2023 Rate Case Reply</b>	<b>Distribution Function Revenue Requirement (\$000)</b>			<b>Difference from 2021 Rate Case</b>
	<b>MWh</b>	<b>\$/MWh</b>		
Total	\$354,225	13,886,900	\$25.51	23.5%
Irrigation	\$13,309	234,973	\$56.64	15.0%

1           **D.     Rate Spread**

2           **Q.     Staff witness Dr. Dlouhy recommends capping the increase for all customer**  
3           **classes at 25 percent above the average, and not providing any class less than a**  
4           **zero percent price change.<sup>6</sup> Do you agree with him?**

5           A.     No. At the Company’s 6.9 percent reply increase, a 25 percent cap would only allow  
6           for an underpaying class to make 1.7 percent progress towards its cost of service. In  
7           the interest of eventually eliminating interclass cross-subsidies, I think it is  
8           appropriate to apply a larger cap.

9           **Q.     Dr. Dlouhy recommends revising the rate spread within base rates instead of**  
10           **through net rates using the rate mitigation adjustment (RMA). Is this feasible?**

11          A.     No. Dr. Dlouhy misunderstands the nature of the RMA. As I discussed in my direct  
12          testimony, per the Commission’s Direct Access Rules “rates for any class of  
13          consumer must be based on the unbundled costs to serve that class.”<sup>7</sup> Base rates are  
14          set directly on the unbundled costs by rate schedule that are the output from the cost  
15          of service model. The Schedule 299 RMA is the Company’s mechanism by which a  
16          final, reasonable net rate spread may be achieved when taking into consideration  
17          other factors such as allowing for gradual movements toward cost of service.

18          **Q.     Do you agree with AWEC witness Dr. Kaufman that franchise fees should be**  
19          **allocated on proposed revenue instead of present revenue?<sup>8</sup>**

20          A.     Yes. The Company has incorporated this change into its reply filing.

---

<sup>6</sup> See Staff/700, Dlouhy/16.

<sup>7</sup> OAR 860-038-0240(3)(b).

<sup>8</sup> See AWEC/200, Kaufman/8,9.

1 **Q. Please summarize and respond to SBUA witness Mr. Steele's rate spread**  
2 **recommendation.**

3 A. Mr. Steele argues that the Company's rate spread filed in its direct testimony is  
4 unfair, because it results in the residential class getting a smaller increase than  
5 Schedule 23, even though the base rate increase for the residential class is higher. He  
6 recommends setting the net increase for both the residential and Schedule 23 classes  
7 at the same level.<sup>9</sup> The Company does not agree with Mr. Steele that its proposed  
8 increase for Schedule 23 filed in direct testimony was unfair or unreasonable.  
9 Currently, Schedule 23 customers pay a Schedule 299 Rate Mitigation Adjustment  
10 surcharge indicating that they are subsidizing other classes. In the direct filing, the  
11 Company proposed to eliminate that surcharge for Schedule 23 customers, so that  
12 they would be neither subsidizing, nor subsidized by, other classes. In this reply  
13 filing, as part of the proposed rate spread cap described below in my testimony, the  
14 Company proposes to implement an RMA credit to Schedule 23 customers.  
15 Although minimizing RMA subsidies is an important goal for the Company, the  
16 RMA is an essential tool in limiting large rate increases to some customer classes.  
17 The Company proposes, by providing an RMA credit to Schedule 23 customers, to  
18 cap their increase in this reply case to 50 percent over the overall net rate increase.  
19 The Company believes this is a reasonable level of RMA relief to provide Schedule  
20 23 customers as a part of the proposed reply case.

---

<sup>9</sup> See SBUA/100, Steele/13.

1 **Q. Do you agree with Mr. Steele that small business customers should receive**  
2 **special treatment over and above other customers because they are still**  
3 **struggling to recover from the historic COVID-19 global pandemic?**<sup>10</sup>

4 A. No. I think that there are a variety of headwinds in the economy that can affect  
5 customers from any of the different rate classes. Residential, irrigation, large  
6 industrial, and street lighting customers could all argue that they face economic  
7 hardship. I do not think that SBUA's arguments should be given weight over and  
8 above any other class of customers.

9 **Q. What does the Company propose for rate spread in its reply testimony?**

10 A. In consideration of concerns raised by different parties, the Company recommends  
11 that no class receive an increase greater than 50 percent over the average increase.  
12 Specifically, with the overall net rate increase of 6.9 percent the Company proposes  
13 that no class have an increase greater than 10.4 percent. The Company also  
14 continues to propose that no customer class receive a net decrease. To achieve these  
15 goals, proposed RMA credits limit the Schedule 23 and irrigation Schedule 41  
16 increase to the capped amount. RMA surcharges are applied to medium general  
17 service Schedules 28 and 30 and lighting schedules to keep their net rate change at  
18 zero. For large general service Schedules 47 and 48, as in the initial filing in this  
19 case, the Company proposes to set the RMA to zero so that they are neither paying an  
20 RMA surcharge nor receiving a credit. For residential customers, the Company  
21 proposes a rate increase approximately 1.4 times the overall rate increase, consistent  
22 with the proposal for residential customers in the initial filing. Exhibit PAC/2106

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<sup>10</sup> See SBUA/100, Steele/14.



1 shows the Company's proposed reply rate spread on Page 1 along with the proposed  
2 RMA credits and surcharges on Pages 2 and 3.

3 **E. Residential Rate Design**

4 **Q. Staff witness Dr. Dlouhy agrees with increasing the single-family basic charge to**  
5 **\$12, but disagrees with including the cost of line transformers in the calculation**  
6 **of the basic charge.<sup>11</sup> Why is it appropriate for the cost of line transformers to**  
7 **be a part of what is considered customer-related?**

8 A. There are several reasons why the cost of line transformers should be recovered in the  
9 basic charge. First, the cost of line transformers is unaffected by changes in customer  
10 energy usage. Transformers are usually set at the time of construction and are  
11 designed to provide a sufficient level of capacity for the needs of a small group of  
12 customers that are located close-by. Transformers come in standard sizes and are not  
13 available in a continuous and granular range of capacities. For example, the smallest  
14 sized transformer is 10 kilovolt-amp (kVA). The next largest size is 25 kVA or two  
15 and a half times larger. The next largest single-phase transformer is 50 kVA or twice  
16 as large. When designing the electric infrastructure for a community of residential  
17 homes, appropriately sized transformers are selected to ensure that ample capacity is  
18 available to serve the different customers connected to them including some level of  
19 potential load growth. While a customer's conservation efforts may lessen the strain  
20 on upstream utility facilities and, in aggregate with many other customers, could defer  
21 the need to re-conductor a line, upgrade a substation or build new generating plants,  
22 those conservation efforts will not lower the Company's cost of line transformers.

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<sup>11</sup> See Staff/700, Dlouhy/24,25.

1           Second, the cost of a transformer does not increase proportionately to overall  
2 customer size. A pad mounted 25 kVA transformer costs about \$4,113 to install,  
3 while a pad mounted 50 kVA transformer that has twice the capacity costs about  
4 \$4,466 to install—an increase of only 9 percent. Because of these economies of  
5 scale, a large factor in the overall cost of line transformers in the Company’s system  
6 is the total number of transformers deployed. The cost to provide this equipment is  
7 consequently not driven entirely by size, but by the number of customers and their  
8 geographic dispersion. The Company’s marginal cost of service study reflects this  
9 dynamic by using a regression model to predict the marginal cost of line transformers  
10 and disaggregate the fixed per customer component and the capacity-related  
11 component. The regression does a good job of predicting transformer costs, as  
12 indicated by an r-squared statistic of 97 percent. Because of the significant fixed  
13 nature of line transformer investments, 89 percent of the marginal cost of line  
14 transformers for the residential class are considered customer-related in the  
15 Company’s class cost of service study with the remainder considered demand-related.

16           For the residential class, size of customer may be particularly unimportant in  
17 driving the Company’s cost of line transformers, because of how line extension  
18 allowances work. When service is provided to residential customers, the portion of  
19 the cost to connect to the Company’s system for which the Company is responsible,  
20 otherwise known as the line extension allowance, is a fixed dollar amount. If the cost  
21 to connect a residential customer exceeds their line extension allowance, they will  
22 pay for that additional cost. For a very large residential customer who requires a  
23 much larger than average transformer, that customer would likely not have had a

1 sufficiently large line extension allowance and would have paid for the incremental  
2 cost of the larger transformer serving it upfront.

3 Finally, line transformers typically serve a small number of customers and are  
4 located geographically close to the customers they serve. On average, 4.1 residential  
5 customers are served by a transformer. Line transformers should not be lumped  
6 together with generation, transmission and upstream distribution costs that are  
7 generally included in the energy charge for residential customers. Generation,  
8 transmission and upstream distribution facilities are used by many customers, are  
9 often located far away from a customer's location and are consequently a more  
10 fungible resource that can more flexibly serve customers as they come and go and as  
11 loads rise and fall. Line transformers are more similar to meters and service drops,  
12 because they serve only one or a very small number of customers and are located  
13 close to customers. They are inflexible and cannot be easily redeployed to other  
14 customers as loads fluctuate.

15 **Q. Dr. Dlouhy discusses how electric vehicle (EV) adoption may drive the need for**  
16 **system upgrades as a reason against including certain costs in the basic charge.**  
17 **Does he provide any evidence that the changing energy landscape will materially**  
18 **alter the Company's cost of providing line transformers for its residential**  
19 **customers?**

20 A. No, he does not. The Company plans its system to provide customers with a high  
21 level of reliability. Line transformers, which are typically used by a small number of  
22 residential customers, are sized conservatively considering the maximum peak  
23 capacity that the Company expects each home could use. While it is true that the  
24 addition of a substantial new load, like an electric vehicle, could cause a transformer

1 to become overloaded and fail, transformer failures are uncommon. While the  
2 Company is concerned about the potential for EV loads to impact the local  
3 distribution system, EV adoption is still pretty low at this time in the Company's  
4 service territory. As charging load scales up, the Company believes that impacts will  
5 be mitigated by time of use pricing and/or demand response.

6 **Q. Dr. Dlouhy objects to the Company's residential basic charge comparison**  
7 **including the basic charges of publicly owned utilities.<sup>12</sup> Why is this information**  
8 **a relevant point of reference for considering the Company's residential basic**  
9 **charge?**

10 A. While investor-owned utilities comprise a large majority of electric utility customers  
11 in Oregon, and their prices are subject to Commission scrutiny and approval as Dr.  
12 Dlouhy points out, comparing the Company's basic charge to the basic charges for  
13 both publicly-owned and investor-owned utilities is useful. It is useful, not because I  
14 expect that someone would change where they live because of their electric utility's  
15 basic charge level, but because it illustrates the standard practices of other utilities  
16 that operate in close proximity to the regions PacifiCorp serves. PacifiCorp is very  
17 different than the largest investor-owned utility, Portland General Electric Company,  
18 and serves a more rural and geographically diverse service territory. As such, the  
19 customer and distribution system characteristics of publicly-owned electric utilities  
20 may be more similar to the Company's. Also, while investor-owned utility rates are  
21 subject to Commission oversight and must be set to reflect cost, Dr. Dlouhy presents  
22 no evidence that the basic charges of publicly-owned utilities are unreasonable or are

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<sup>12</sup> See Staff/700, Dlouhy/26.

1 unreflective of cost of service. The boards for public utility districts are generally  
2 made up of elected commissioners and those boards scrutinize pricing and must  
3 approve any rate changes that occur for their customers. These public utility basic  
4 charges provide an additional helpful benchmark that confirms the reasonableness of  
5 the Company's proposed basic charge.

6 **Q. Dr. Dlouhy expresses some skepticism that tier flattening can help with electric**  
7 **vehicle adoption and references time of use and demand response as better ways**  
8 **to achieve that goal.<sup>13</sup> Please comment.**

9 A. I agree with Dr. Dlouhy that time of use and demand response are very important  
10 tools to reduce customer costs for electrification and encourage customers to shift  
11 these loads to more beneficial times. For example, in the 2021 Rate Case, the  
12 Company proposed a residential time of use pilot to give customers a new option  
13 which could make charging an electric vehicle more affordable. However, increasing  
14 adoption for programs like these takes time. Customers can be risk averse and are  
15 hesitant to choose a time of use plan that differs from the standard pricing to which  
16 they are accustomed. Meanwhile, they are at present faced with a price signal that  
17 arbitrarily tells them that energy usage over 1,000 kWh per month is more expensive  
18 per kWh. With average monthly residential usage at 900 kWh and charging an  
19 electric vehicle adding about 300 more kWh<sup>14</sup> per month, customers who examine  
20 and understand the Company's pricing will perceive that they are being penalized for  
21 this load addition. The primary reason for flattening tiered rates is that it better aligns

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<sup>13</sup> See Staff/700, Dlouhy/28,29.

<sup>14</sup> Assuming 1,000 miles driven and a vehicle that gets about 3 miles to the kWh, additional load from EV charging would be 333 kWh per month.

1 with the economics of the service provided. A secondary benefit is that it removes a  
2 disincentive to electrification.

3 **Q. Please summarize Dr. Dlouhy's testimony regarding the appropriate summer to**  
4 **winter price differential to use for residential energy charges.**

5 A. Dr. Dlouhy indicates that Staff is still investigating what the appropriate seasonal  
6 differential should be. He discusses how the Company's loss of load probability is  
7 greater during the summer, but declines to incorporate a capacity value into the  
8 seasonal differential calculation for the present time. He then objects to the Company  
9 basing its differential on a single wholesale market hub and instead recommends  
10 relying upon the weighted average pricing for wholesale transactions at a variety of  
11 market hubs. As a result, Staff recommends a 1.43 cents per kWh differential.<sup>15</sup>

12 **Q. Do you agree with Dr. Dlouhy that 1.4 cents per kWh is a better summer to**  
13 **winter price differential than the 1.9 cents per kWh that the Company proposes?**

14 A. No. While a seasonal differential for residential rates could be calculated in a variety  
15 of different ways, the value determined by the Company is reasonable and fairly  
16 reflects cost differences by season. Staff's value is based upon historical wholesale  
17 market pricing. The Company's value is more appropriate because it reflects forecast  
18 wholesale market prices that are anticipated to occur during the period when rates are  
19 in effect in 2023.

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<sup>15</sup> See Staff/700, Dlouhy/30-36.

1 **Q. Dr. Dlouhy argues that Residential Exchange Program (REP) benefits are a**  
2 **fixed amount and are more appropriately set at a fixed level for residential**  
3 **customers than applied to all energy usage.<sup>16</sup> Do you agree with him?**

4 A. No. The calculation of the level of REP benefits that are made available to  
5 PacifiCorp's eligible customers is directly based upon the Company's energy sales to  
6 eligible customers. Residential usage at all levels, below and above 1,000 kWh,  
7 drives the share of REP benefits made available. Sharing the benefits with all usage  
8 better aligns with the language in the Pacific Northwest Power Planning and  
9 Conservation Act, which states that the cost benefits under the REP "shall be passed  
10 through directly to such utility's residential loads."<sup>17</sup> The Company's proposed  
11 flattening of the Schedule 98 credit better reflects the intent of this legislation, which  
12 is to ensure that all residential loads benefit from the residential exchange program.

13 **Q. Dr. Dlouhy references some very large users that received arrearage**  
14 **management program funding and argues that it is wasteful to provide REP**  
15 **benefits for these customers.<sup>18</sup> Please comment.**

16 A. I think Staff is focusing on a handful of outliers in the residential customer usage  
17 data. A large number of residential customer bills are for usage in excess of  
18 1,000 kWh. In fact, when examining the 2019 Residential Email Survey, 31 percent  
19 of monthly bills for lower-income customers with household income below \$50,000  
20 per year are for more than 1,000 kWh. The presence of a very small number of  
21 residential customers with usage over 10,000 kWh per month should not be relied

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<sup>16</sup> See Staff/700, Dlouhy/36-43.

<sup>17</sup> 16 USC §839c(c)(3).

<sup>18</sup> See Staff/700, Dlouhy/38-40.

1 upon to prevent other customers with more moderate usage levels from receiving  
2 REP benefits for all their usage.

3 **Q. Do you think that it would be reasonable to put a cap on the monthly per**  
4 **residential customer kWh that are eligible for the Schedule 98 REP credit?**

5 A. Yes. I think one way to address Staff's concerns that a flat energy-based REP credit  
6 would go to customers with extremely high usage levels is to cap the per customer  
7 monthly level of kWh eligible for the credit at a level that covers the monthly usage  
8 of most residential customers who are of a reasonable size. The Company is not  
9 proposing a specific level for such a cap at this time but believes it should be higher  
10 than 1,000.

11 **Q. Dr. Dlouhy offers up the idea of designing the Schedule 98 REP credit as a flat**  
12 **per bill credit.<sup>19</sup> What is your opinion of this alternative?**

13 A. I think that having a flat per bill REP credit is even more problematic than only  
14 making the credit available to the first 1,000 kWh of usage. It makes the credit more  
15 out of step with the language of Pacific Northwest Power Planning and Conservation  
16 Act. For example, under Staff's proposal a small apartment-dwelling customer using  
17 200 kWh in a given month would receive the same monthly credit as a large family  
18 living in a house and using 2,000 kWh in the same month, thus shifting credits from  
19 customers who use the energy to smaller usage customers. Additionally, it makes  
20 reasonable levels of incremental energy usage less affordable, which I believe is not  
21 accurate and is harmful to the economics of electrification.

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<sup>19</sup> See Staff/700, Dlouhy/42-43.



1 **Q. Do you agree with CUB witness Mr. Gehrke that “seasonal rates arbitrarily**  
2 **benefit some customers, but disadvantage others”?**<sup>20</sup>

3 A. No. The Company’s proposal to vary residential energy charges by season is not  
4 arbitrary, but is based upon the Company’s higher cost to serve during summer  
5 months.

6 **Q. Mr. Gehrke discounts the influence that seasonal rates can have for encouraging**  
7 **energy efficiency, because some customers rent and do not have the ability to**  
8 **modify their home’s performance.**<sup>21</sup> **Do you think that this is a valid reason to**  
9 **not seasonally differentiate residential rates?**

10 A. No. I agree that implementing energy efficiency measures for homes that are rented  
11 can be very challenging. However, sending customers accurate price signals about  
12 their energy choices is important to influence behaviors and many customers do own  
13 their own homes. As Mr. Gehrke points out, “customers tend to replace appliances  
14 such as HVAC appliances or water heaters when the unit fails.” Once a customer  
15 makes such a replacement for a failed unit, that customer is locked into their decision  
16 for many years. Seasonal prices like the ones proposed by the Company accurately  
17 let customers know that energy costs are higher in the summer. This information  
18 makes, for example, the economic case for a heat-pump water-heater stronger since  
19 this technology removes heat from the air and is therefore more efficient during the  
20 warmer summer months.

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<sup>20</sup> See CUB/200,Gehrke/19.

<sup>21</sup> See CUB/200,Gehrke/20-22.

1 **Q. Mr. Gehrke characterizes the Company’s proposal as a “seasonal penalty**  
2 **approach,” and argues that a carrot approach like implementing demand**  
3 **response and energy efficiency incentives, would be more appropriate.<sup>22</sup> Please**  
4 **comment.**

5 A. I do not agree with the characterization of the Company’s seasonal pricing proposal  
6 as a “seasonal penalty.” While the summer price is higher under this rate design, the  
7 winter price is lower. It is not a penalty, but rather a differentiated rate structure  
8 based on the actual differential cost of energy. The Company agrees that providing  
9 demand response and energy efficiency programs, when cost effective and  
10 appropriately designed, is worthwhile. However, it should be clear that offering such  
11 programs and seasonally differentiating rates are not mutually exclusive. Both  
12 encourage behaviors and investments that help customers use energy more efficiently.

13 **Q. Do you agree with Mr. Gehrke that the Company’s ability to compete with**  
14 **natural gas should not be a reason to impose residential seasonal rates?<sup>23</sup>**

15 A. Yes. I agree that the rationale for implementing seasonal rates should not be that they  
16 make electric heating more competitive with natural gas, but instead that they better  
17 reflect the economics of providing customers with energy. A practical application of  
18 this result is that customers are given better information about the most economic fuel  
19 for heating their homes. The Commission should take this information into  
20 consideration as they review the Company’s residential rate design proposal.

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<sup>22</sup> See CUB/200,Gehrke/21-22.

<sup>23</sup> See CUB/200,Gehrke/22.

1 **Q. Mr. Gehrke discusses in his testimony how seasonal rates could potentially have**  
2 **different impacts to customers living in different climates throughout the**  
3 **Company's diverse geographic service territory.<sup>24</sup> Please comment.**

4 A. Mr. Gehrke discusses how theoretical customers in Umatilla and Coos Bay could be  
5 impacted differently and how the cooling degree days in different parts of the  
6 Company's service territory are higher than other parts. Ultimately, he focuses on  
7 only the summer part of the seasonal rate structure without performing analysis on the  
8 benefit of lower winter prices and how customers' annual bills may be impacted  
9 across different regions.

10 **Q. Have you performed any analysis to better understand how the Company's**  
11 **proposed residential rate design would impact customers living in different parts**  
12 **of the Company's service area?**

13 A. Yes. Using the information from the 2019 Residential Email Survey, I examined the  
14 average monthly bill impact from the Company's proposed residential rates that were  
15 included in its direct filing for customers living in different geographic regions.  
16 I categorized the counties where the Company has service territory into six  
17 geographic regions. The Central Oregon region includes Crook, Deschutes, Gilliam,  
18 Jefferson, Sherman, and Wasco counties. The Eastern Oregon region includes  
19 Morrow, Umatilla, and Wallowa counties. The Oregon Coast region includes  
20 Clatsop, Coos, Lincoln, and Tillamook counties. The Portland/Hood  
21 River/Willamette Valley region includes Benton, Hood River, Lane, Linn, Marion,  
22 Multnomah, and Polk counties. The Southeast Oregon region includes Klamath and

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<sup>24</sup> See CUB/200, Gehrke/17-19.

1 Lake counties. The Southern Oregon region includes Douglas, Jackson, and  
2 Josephine counties. Table 2 shows the results of this analysis:

**Table 2: Impact of Proposed Residential Price Change from Direct Filing by Geographic Region**

Region	Average Bill (Present)	Average Bill (Proposed)	Change	% Change	Difference from Overall Oregon
Central Oregon	\$97.30	\$111.59	\$14.29	14.7%	-0.5%
Eastern Oregon	\$115.39	\$131.38	\$15.98	13.9%	-1.3%
Oregon Coast	\$89.63	\$103.16	\$13.53	15.1%	-0.1%
Portland/Hood River/Willamette Valley	\$85.57	\$99.65	\$14.07	16.4%	1.3%
Southeast Oregon	\$99.77	\$114.53	\$14.76	14.8%	-0.4%
Southern Oregon	\$112.46	\$128.82	\$16.36	14.6%	-0.6%
Overall Oregon	\$97.77	\$112.63	\$14.85	15.2%	

3 Table 2 shows that the average impact across regions is fairly similar with all regions  
4 being within plus or minus 1.3 percent of the overall average for all regions. Based  
5 upon this information, I do not think that there is evidence that the Company's  
6 proposed residential rate design unfairly or disproportionately impacts customers  
7 based upon the region where they live.

8 **Q. Even if there were very modest differences in bill impacts for customers living in  
9 different geographies, would this nullify the merits of seasonal pricing?**

10 A. No. While it is important to consider the equity impacts of rate design, seasonal  
11 residential rates are primarily justified because they better reflect the economics of  
12 the Company's cost of providing service and will more fairly apportion costs to  
13 customers.

1 **Q. Mr. Gehrke argues against raising the basic charge by referencing the business**  
2 **models of other industries whose pricing is volumetric.<sup>25</sup> Do you think that this**  
3 **comparison illustrates that the Company’s proposed increase to the basic charge**  
4 **for residential customers living in single family homes is unreasonable?**

5 A. No. While many competitive industries charge only for volumetric usage, it is also  
6 common for different industries to charge their customers on an entirely fixed basis or  
7 on a hybrid of both fixed and volumetric charges. For example, streaming video  
8 services usually charge a flat fee for all-you-can-watch television shows and movies  
9 on their platform. Internet providers similarly charge a flat per month fee based upon  
10 the speed of service. Home delivery subscription retailers and discount warehouse  
11 club retailers typically charge a fixed annual or monthly charge for membership and  
12 also charge for the actual goods sold. It is not unreasonable for the Company to have  
13 a modest \$12 per month fixed charge for its residential customers living in single  
14 family homes. Per the Company’s direct filing, recovery of costs from the Basic  
15 Charge still only comprises 11 percent of proposed residential class revenue even  
16 with the increase to the single-family basic charge.

17 **Q. Mr. Gehrke references that in his experience speaking with utility customers,**  
18 **including customers of publicly owned electric utilities, that customers have**  
19 **expressed a preference for lower fixed charges, so that they could have greater**  
20 **control of their bills.<sup>26</sup> Please comment.**

21 A. The Company certainly takes customer experience and gradualism into account but  
22 recognizes the importance of assigning rates to customers based on cost causation.

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<sup>25</sup> See CUB/200,Gehrke/17-19.

<sup>26</sup> See CUB/200,Gehrke/25,26.

1 Mr. Gehrke states “(a)s a residential class, the Company’s proposed rate design  
2 change is revenue neutral.” While some customers may have higher bills with a  
3 higher basic charge, other customers subsidize, through volumetric rates, the fixed  
4 costs incurred by smaller usage customers when basic charges are too low.

5 **Q. Both Staff and CUB voice equity concerns with how the Company’s residential**  
6 **rate design, taken as a whole, may adversely impact customers. Has the**  
7 **Company performed any analysis on how the Company’s proposed rate**  
8 **structure could help the Company’s most vulnerable customers?**

9 A. Yes. As part of Staff’s investigation into implementing House Bill 2475, it has  
10 identified reducing the number of customers who are energy burdened, meaning they  
11 spend more than six percent of their income on energy, as a key goal for development  
12 of utility-offered low-income residential discount programs. To better understand the  
13 equity impacts of the Company’s proposed changes to the underlying residential rate  
14 structure, the Company analyzed the impact that each rate design choice had on the  
15 count of customers who would be considered energy burdened using the 2019  
16 Residential Email Survey. To perform this analysis some assumptions were required.  
17 The survey identified the income of survey participants within a range, so the  
18 midpoint between the identified range was assumed to be each customer’s income.  
19 Also, it was assumed that if the customers were eligible for the Low Income Home  
20 Energy Assistance Program (LIHEAP) or the Company’s proposed Schedule 7 Low-  
21 Income Discount (LID) which has an anticipated effective date of August 1, 2022,  
22 they would be receiving those benefits. The Company then developed rates under  
23 five scenarios using the proposed residential class revenue from the Company’s direct

1 filed case. Each pricing scenario builds off the one before it. The first scenario  
 2 assumes no change to rate design and simply applies the increase uniformly to energy  
 3 charges. The second scenario increases the single-family basic charge to \$12. The  
 4 third scenario flattens the base energy charges and removes tiers. The fourth scenario  
 5 institutes seasonal pricing. The fifth scenario flattens the Schedule 98 REP credit. In  
 6 order to recognize the full impact to customers, all scenarios include the impact of  
 7 existing adders and pass throughs and include the filed TAM increase. Table 3 below  
 8 shows the results of this analysis:

9 **Table 3: Change in Energy Burdened Customers with Different Residential Rate**

10 **Design Choices**

	Pricing Scenario					Total Rate Design Impact
	1) Equal Increase to Energy Charges	2) Increase Single Family Basic Charge to \$12	3) Flatten Base Energy Charges	4) Seasonal Flat Base Energy Charges	5) Flatten BPA Credit	
Net First Block kWh, 0-1,000 (¢/kWh)	10.532	10.301	10.646	(1.142)		
Net Second Block kWh, > 1,000 (¢/kWh)	12.844	12.613	11.580	(0.208)		
Net Summer kWh (¢/kWh)				13.178	12.264	
Net Winter kWh (¢/kWh)				11.249	10.335	
Net Single-Family Basic Charge (\$/month)	9.64	12.18	12.18	12.18	12.18	
Net Multi-Family Basic Charge (\$/month)	8.12	8.12	8.12	8.12	8.12	
Energy Burdened Customers in Survey	936	928	906	894	887	
Change with Each Scenario		-0.9%	-2.4%	-1.3%	-0.8%	<b>-5.2%</b>

11 Table 3 illustrates that each of the Company’s proposed modifications to  
 12 residential rate design is likely to reduce the energy burden for the Company’s most  
 13 vulnerable customers. The cumulative impact of all of the proposed changes is a  
 14 5.2 percent reduction in energy burdened customers.

1           **F.       Large General Service Schedule 48**

2           **Q.       Do you agree with AWEC witness Dr. Kaufman’s suggestion to create a new**  
3           **category within Schedule 48 for customers with dedicated substations?**

4           A.       No. Adding this subcategory to Schedule 48 increases tariff complexity to provide a  
5           benefit for a small number of large customers.

6           **Q.       Does the Company’s study prepared as a requirement of settlement in the 2021**  
7           **Rate Case provide sufficient evidence to justify a new dedicated substation**  
8           **facilities classification within the Schedule 48 tariff?**

9           A.       No. While the special marginal cost of service study prepared by the Company as a  
10          requirement of its settlement in the 2021 Rate Case indicated that, if treated  
11          separately, customers with dedicated substations could receive a lower revenue  
12          requirement, I am not persuaded that it would be appropriate to apply the results of  
13          this study to rate design. Revenue requirement is assigned to different classes by  
14          applying each class’s percentage of marginal cost by function to the embedded  
15          functional revenue requirement. This revenue requirement apportionment occurs for  
16          the following functions: generation, transmission, distribution, lighting, ancillary  
17          service, customer – billing, customer – metering, and customer – other. In this way,  
18          class revenues are based upon the results of the marginal cost of service study but are  
19          in aggregate set to recover the overall embedded revenue requirement. Switching to  
20          using a marginal cost of service study like the one prepared for the 2021 Rate Case  
21          settlement would break out a new function for dedicated substations wherein costs  
22          would be directly assigned to a subset of customers and would be akin to having a  
23          part of the Company’s revenue allocation be based upon embedded cost of service as



1           opposed to marginal cost of service. Given the small sample size of the number of  
2           customers served from dedicated substations, the result from the study performed for  
3           the 2021 Rate Case may not be a reflection of any flaw in marginal cost development,  
4           but rather the vintage of the particular substations that are dedicated and their  
5           resultant lower net book values than that of other substations. Marginal cost is used  
6           in Oregon to apportion the revenue requirement to customer classes and it is based  
7           upon the incremental cost of the next customer, unit of energy, or unit of capacity.  
8           Directly assigned one type of service based upon historic embedded cost instead of  
9           marginal cost is out of step with the Commission's preference that marginal cost of  
10          service be used. For these reasons, I am not convinced at this time that a separate  
11          dedicated substation rate category should be pursued.

12       **Q. Dr. Kaufman recommends that rate design for Schedule 48 should be modified**  
13       **in the following ways: adjust system usage rates to only collect system usage**  
14       **revenue requirement; maintain the current monthly basic charge if the charge**  
15       **would otherwise decrease; and adjust the facility capacity charge for above and**  
16       **below 4,000 kW by equal amounts within each delivery voltage level.<sup>27</sup> Do you**  
17       **agree with his recommendations?**

18       A. Not at this time. Dr. Kaufman provided little explanation for his concerns and  
19       recommendations and it is not clear to me how they are an improvement to the  
20       Company's recommended rate design for Schedule 48.

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<sup>27</sup> See AWEC/200,Kaufman/11.

1           **G.     Load Forecast for Irrigation**

2           **Q.     KWUA/OFBF witness Mr. Reed argues that the Company forecast the irrigation**  
3           **class energy sales and customer count too high.<sup>28</sup> Please respond.**

4           A.     Upon closer examination of the irrigation rate schedule forecast, the Company  
5           determined a portion of the forecast irrigation class energy sales assigned to Schedule  
6           41 should be instead assigned to Schedule 48 under the irrigation class. A discussion  
7           of this change is provided with Company witness Mr. Kenneth L. Elder Jr.'s reply  
8           testimony.

9                     The Company also examined the application of forecast customer counts for  
10           the irrigation rate schedule to the annual basic charge counts used to set rates in the  
11           rate design model. The Company originally applied the forecast bill count directly as  
12           the forecast annual bill count. However, upon review, it was determined that there is  
13           a difference in definition between customer count as defined in the Company's  
14           forecast and in the count of annual basic charges. This resulted in an apparent  
15           increase in the number of irrigation customers in the filed case. To more accurately  
16           forecast the annual basic charge billing determinant, the Company has applied to the  
17           historic annual basic charge count a percentage change based on the ratio of historic  
18           customers to forecast customers. The ratio is 100.2 percent which results in forecast  
19           annual bill counts that are very close to the historic counts.

20                     The Company incorporated these changes into its marginal cost of service and  
21           pricing models for its reply filing. This change lowers the Company's present  
22           revenue by approximately \$1 million or 0.1 percent.

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<sup>28</sup> See KWUA-OFBF/100,Reed/11-16.

1           **H.     Disallowance of Arrearage Management Program (AMP) Costs in**  
2                           **COVID Deferral**

3   **Q.     Staff witness Mr. Fox argues that a portion of the Company’s AMP costs in the**  
4           **COVID deferral should be disallowed for very large energy users. Please**  
5           **summarize his position.**

6   A.     Mr. Fox notes that some customers with very large usage received AMP funds and he  
7           surmises that these customers may not truly be residential customers. Since their  
8           usage is greater than 10,000 kWh per month, he believes that it is likely that their  
9           energy is used for “an at-home business or an energy-intensive agricultural crop”.

10          Mr. Fox then notes that Staff’s concerns would have been mitigated “if the Company  
11          followed up with these high-usage customers to verify that they indeed should qualify  
12          for AMP funding and are not using it to subsidize any unsanctioned activities.”

13          Mr. Fox recommends that \$376,593 from the COVID deferral for AMP funds  
14          awarded to bills with usage greater than 10,000 be disallowed.<sup>29</sup>

15   **Q.     Should the Commission disallow this cost as Mr. Fox suggests?**

16   A.     No. The AMP was instituted to provide relief to customers facing economic hardship  
17          from the historic COVID-19 global pandemic. Like many measures taken to provide  
18          relief for this event, swift action was needed to provide much needed assistance to  
19          households adversely impacted from this unprecedented time. Staff and many  
20          different advocates strongly encouraged the Company to take action and offer this  
21          program with haste. To provide relief swiftly, the barriers to participation in the  
22          AMP were not overly rigorous and anyone with a past due balance who attested to

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<sup>29</sup> See Staff/200,Fox/18-21.

1 being impacted by the pandemic was eligible. The AMP was approved by the  
2 Commission and the Company fully complied with the parameters set forth for the  
3 AMP.

4 It is not fair or reasonable to now penalize the Company for managing the  
5 AMP as it was designed and approved by the Commission. An important  
6 consideration for the Company and the Commission in future programs is to apply the  
7 lessons learned from the AMP and limit eligibility for benefits upfront.

8 **Q. What are the Company's practices with respect to determining that a customer**  
9 **is residential?**

10 A. The Company's practice is to apply the definition in the Company's Oregon Rule 2 -  
11 General Rules and Regulations, Types of Service, specifically sections Q and R.  
12 When a request is received for a new or modified service, the operational employee  
13 who fields the request makes the determination if the requested service is residential  
14 based on this definition. Unless there is a change in service, the Company will not  
15 proactively examine a residential customer's usage to ensure that they are on the  
16 appropriate rate schedule. Such an examination, especially for suspected illegal grow  
17 operations, could pose challenges to the safety of the Company's field personnel. In  
18 general, how a customer uses the Company's power behind its meter is the  
19 customer's business and not the Company's responsibility.

1           **I.       Small General Service Schedule 23 Time of Use**

2           **Q.       Do you agree with SBUA witness Mr. Steele that the Commission should order the**  
3           **Company to answer why it didn't propose a new time of use option for Schedule**  
4           **23 customers in this case?**

5           A.       No. The Company did not propose a new time of use option, because Schedule 23  
6           customers already have a time of use option available to them through Schedule 210,  
7           Portfolio Time of Use Supply Service.

8           **Q.       Does this conclude your reply testimony?**

9           A.       Yes.

Docket No. UE 399  
Exhibit PAC/2101  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith  
Updated Unbundled Results of Operations - Summary and Detail

July 2022

PACIFICORP  
STATE OF OREGON  
Combined GRC and TAM

Functionalized Revenue Requirement  
12 Months Ended December 31, 2023 Forecast

Function	Revenue Requirement
Production	\$ 773,719,793
Transmission	\$ 181,837,330
Distribution	\$ 397,638,936
Distribution-Lighting	\$ 3,384,646
Distribution Total	\$ 401,023,582
Ancillary	\$ 23,847,685
Customer Billing	\$ 15,326,213
Customer Metering	\$ 21,166,726
Customer Other	\$ 9,353,438
Retail Service	a \$ -
Public Purposes	b \$ -
Total State of Oregon	\$ 1,426,274,767

- a - Retail Services are conducted as unregulated activities.
  - b - DSM is collected by a separate tariff.
- Public Purposes are collected by a separate tariff.

PACIFICORP  
STATE OF OREGON  
Combined GRC and TAM  
Functionalized Revenue Requirement  
12 Months Ended December 31, 2023 Forecast

	ROR	ROE	Total \$	Production	Transmission	Distribution	Distribution- Lighting	Ancillary	Billing	Customer Metering	Other	Distribution Components		
												Poles & Wires	Poles & Wires-Lighting	Franchise Fees
1 Functionalized Sins Revenues @ Earned	4.22%	3.77%	1,245,562,594	714,186,847	125,865,238	337,550,898	2,744,355	23,847,685	14,775,040	17,490,939	9,101,590	302,795,878	2,461,790	35,037,586
2 System Allocated Revenues			-	-	-	-	-	-	-	-	-	-	-	-
3 Total Oregon General Business Revenue			1,245,562,594	714,186,847	125,865,238	337,550,898	2,744,355	23,847,685	14,775,040	17,490,939	9,101,590	302,795,878	2,461,790	35,037,586
4 Target Increase in Return	7.37%	9.80%	131,698,542	44,419,974	41,763,074	41,729,013	444,659	-	411,253	2,742,655	187,914	41,729,013	444,659	-
7 Add														
8 Uncollectible Expense			912,087	300,473	282,501	303,275	3,232	-	2,782	18,552	1,271	282,271	3,008	21,228
9 Franchise Tax			4,161,363	-	-	4,117,488	43,875	-	-	-	-	-	-	4,161,363
10 Other Revenue Based Taxes			1,003,257	330,508	310,740	333,590	3,555	-	3,060	20,407	1,398	310,486	3,308	23,350
11 Inc Taxes - State			7,928,450	2,674,149	2,514,200	2,512,149	26,769	-	24,758	165,112	11,313	2,512,149	26,769	-
12 Inc Taxes - Federal			35,008,473	11,807,841	11,101,577	11,092,522	118,200	-	109,320	729,060	49,952	11,092,522	118,200	-
13 Total Increase Needed			180,712,173	59,532,946	55,972,092	60,088,038	640,290	-	551,173	3,675,787	251,848	55,926,442	595,945	4,205,942
14 Total Oregon General Business Revenue @	7.37%	9.80%	1,426,274,767	773,719,793	181,837,330	397,638,936	3,384,646	23,847,685	15,326,213	21,166,726	9,353,438	358,722,319	3,057,735	39,243,528
16 Less: System Allocated Revenues			-	-	-	-	-	-	-	-	-	-	-	-
17 Total Unbundled Revenue Requirement			1,426,274,767	773,719,793	181,837,330	397,638,936	3,384,646	23,847,685	15,326,213	21,166,726	9,353,438	358,722,319	3,057,735	39,243,528
18 Rate Base			4,179,558,977	1,409,703,540	1,325,384,695	1,324,303,730	14,111,605	-	13,051,437	87,040,374	5,963,596	1,324,303,730	14,111,605	-
				33.73%	31.71%	31.69%	0.34%	0.00%	0.31%	2.08%	0.14%	31.69%	0.34%	0.00%

Notes:  
Row 9: Franchise Tax @ 2.30%  
Row 11: Inc Taxes - State 4.54%  
Row 12: Inc Taxes - Federal 21.00%



Docket No. UE 399  
Exhibit PAC/2102  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith  
Updated Functionalized Oregon Results of Operations Report

July 2022

PACIFICORP  
STATE OF OREGON  
Combined GRC and TAM  
Unbundled Results of Operations  
12 Months Ended December 31, 2023 Forecast

	Total \$	Production	Transmission	Distribution	Dist-Lighting	Ancillary	C Billing	C Metering	C Other
<b>Operating Revenues</b>									
General Business Revenues	1,245,562,594	714,186,847	125,865,238	337,550,898	2,744,355	23,847,685	14,775,040	17,490,939	9,101,590
Special Sales	102,596,785	102,596,785	-	-	-	-	-	-	-
Other Operating Revenues	80,909,734	38,885,171	60,214,337	4,106,300	3,205	(23,847,685)	661,822	390,035	496,550
<b>Total Operating Revenues</b>	<b>1,429,069,113</b>	<b>855,668,803</b>	<b>186,079,575</b>	<b>341,657,198</b>	<b>2,747,560</b>	<b>-</b>	<b>15,436,862</b>	<b>17,880,974</b>	<b>9,598,140</b>
<b>Operating Expenses</b>									
Steam Production	251,200,664	251,200,664	-	-	-	-	-	-	-
Nuclear Production	-	-	-	-	-	-	-	-	-
Hydro Production	12,195,411	12,195,411	-	-	-	-	-	-	-
Other Power Supply	367,975,636	367,975,636	-	-	-	-	-	-	-
ECD	-	-	-	-	-	-	-	-	-
Transmission	59,585,511	207,702	59,377,809	-	-	-	-	-	-
Distribution	116,474,578	-	-	113,798,483	898,815	-	-	1,777,279	-
Customer Accounts	23,650,478	3,793,292	824,915	1,514,611	12,180	-	9,744,847	3,870,054	3,890,579
Customer Service	4,692,219	-	-	2,367,268	-	-	-	-	2,324,952
Sales	-	-	-	-	-	-	-	-	-
Administrative & General	63,204,272	15,884,877	6,328,518	35,117,243	192,357	-	2,038,499	2,577,399	1,065,379
<b>Total O &amp; M Expenses</b>	<b>898,978,769</b>	<b>651,257,582</b>	<b>66,531,242</b>	<b>152,797,604</b>	<b>1,103,353</b>	<b>-</b>	<b>11,783,346</b>	<b>8,224,732</b>	<b>7,280,910</b>
Depreciation	287,295,417	183,918,491	40,115,616	58,594,390	829,649	-	549,794	2,987,603	299,875
Amortization Expense	34,357,204	5,783,078	1,656,969	20,795,624	45,888	-	2,362,345	2,073,856	1,639,443
Taxes Other Than Income	89,848,715	24,393,405	12,572,050	51,281,093	196,584	-	321,497	874,616	209,471
Income Taxes - Federal	(69,043,545)	(77,818,868)	1,067,861	7,893,490	244,519	-	(510,858)	448,675	(368,365)
Income Taxes - State	(3,423,104)	(2,049,616)	(445,724)	(818,385)	(6,581)	-	(36,977)	(42,831)	(22,991)
Income Taxes - Def Net	14,587,854	11,172,889	8,623,289	(5,310,791)	(261,651)	-	416,677	(360,570)	308,010
Investment Tax Credit Adj.	-	-	-	-	-	-	-	-	-
Misc Revenue & Expense	4,502	(506,624)	(207)	511,333	-	-	-	-	-
<b>Total Operating Expenses</b>	<b>1,252,605,813</b>	<b>796,150,337</b>	<b>130,121,097</b>	<b>285,744,360</b>	<b>2,151,760</b>	<b>-</b>	<b>14,885,824</b>	<b>14,206,081</b>	<b>9,346,353</b>
<b>Operating Revenue for Return</b>	<b>176,463,300</b>	<b>59,518,466</b>	<b>55,958,478</b>	<b>55,912,839</b>	<b>595,800</b>	<b>-</b>	<b>551,039</b>	<b>3,674,893</b>	<b>251,786</b>
<b>Rate Base</b>									
Electric Plant in Service	8,832,858,186	3,758,983,683	2,119,481,008	2,693,938,078	33,212,674	-	49,506,025	145,279,057	32,457,663
Plant Held for Future Use	-	1,757,792	(561,055)	(1,123,039)	-	-	(36,787)	(36,911)	-
Misc Deferred Debits	67,039,001	57,504,396	3,101,941	4,463,903	71,474	-	728,077	768,218	400,993
Elec Plant Acq Adj	699,759	699,759	-	-	-	-	-	-	-
Nuclear Fuel	-	-	-	-	-	-	-	-	-
Prepayments	11,116,576	4,748,693	1,151,164	3,623,273	57,965	-	589,049	621,983	324,448
Fuel Stock	37,219,586	37,219,586	-	-	-	-	-	-	-
Material & Supplies	81,632,777	66,682,599	1,207,676	13,305,200	-	-	-	437,302	-
Working Capital	13,614,617	5,322,108	1,434,758	5,179,919	65,309	-	625,976	634,767	351,781
Weatherization Loans	-	-	-	-	-	-	-	-	-
Miscellaneous Rate Base	(101,493)	(101,493)	-	-	-	-	-	-	-
<b>Total Electric Plant</b>	<b>9,044,079,009</b>	<b>3,932,817,124</b>	<b>2,125,815,492</b>	<b>2,719,387,333</b>	<b>33,407,421</b>	<b>-</b>	<b>51,412,339</b>	<b>147,704,416</b>	<b>33,534,884</b>
<b>Rate Base Deductions</b>									
Accum Prov For Depr	(3,565,614,879)	(1,736,797,433)	(577,959,187)	(1,198,772,966)	(16,682,364)	-	(3,395,635)	(30,159,039)	(1,848,254)
Accum Prov For Amort	(217,778,883)	(72,007,240)	(20,429,304)	(49,051,980)	(765,506)	-	(32,272,047)	(20,995,863)	(22,256,942)
Accum Def Income Taxes	(643,328,592)	(313,742,098)	(179,329,639)	(136,607,119)	(1,685,655)	-	(1,307,407)	(7,953,827)	(2,702,846)
Unamortized ITC	(45,658)	(18,575)	(3,483)	(16,376)	(262)	-	(2,671)	(2,818)	(1,471)
Customer Adv for Const	(22,975,394)	-	(20,905,487)	(1,961,291)	(23,889)	-	-	(84,727)	-
Customer Service Deposits	-	-	-	-	-	-	-	-	-
Misc. Rate Base Deductions	(414,776,627)	(400,548,238)	(1,803,696)	(8,673,871)	(138,139)	-	(1,383,142)	(1,467,767)	(761,774)
<b>Total Rate Base Deductions</b>	<b>(4,864,520,032)</b>	<b>(2,523,113,584)</b>	<b>(800,430,797)</b>	<b>(1,395,083,603)</b>	<b>(19,295,816)</b>	<b>-</b>	<b>(38,360,902)</b>	<b>(60,664,042)</b>	<b>(27,571,288)</b>
<b>Total Rate Base</b>	<b>4,179,558,977</b>	<b>1,409,703,540</b>	<b>1,325,384,695</b>	<b>1,324,303,730</b>	<b>14,111,605</b>	<b>-</b>	<b>13,051,437</b>	<b>87,040,374</b>	<b>5,963,596</b>
<b>Return on Rate Base</b>	<b>4.2221%</b>	<b>4.2221%</b>	<b>4.2221%</b>	<b>4.2221%</b>	<b>4.2221%</b>	<b>4.2221%</b>	<b>4.2221%</b>	<b>4.2221%</b>	<b>4.2221%</b>
<b>Return on Equity</b>	<b>3.7693%</b>	<b>3.7693%</b>	<b>3.7693%</b>	<b>3.7693%</b>	<b>3.7693%</b>	<b>3.7693%</b>	<b>3.7693%</b>	<b>3.7693%</b>	<b>3.7693%</b>

2020 PROTOCOL  
RESULTS OF OPERATIONS SUMMARY  
12 Months Ended December 31, 2023 Forecast

Operating Revenues		Total\$	Production	Transmission	Distribution	Dist-Lighting	Ancillary	C Billing	C Metering	C Service	DSM
General Business Revenues		1,245,562,594	714,186,847	125,865,238	337,550,898	2,744,355	23,847,685	14,775,040	17,490,939	9,101,590	-
General Business Revenues		-	-	-	-	-	-	-	-	-	-
Interdepartmental		-	-	-	-	-	-	-	-	-	-
Special Sales		102,596,785	102,596,785	-	-	-	-	-	-	-	-
Other Operating Revenues		80,909,734	38,885,171	60,214,337	4,106,300	3,205	(23,847,685)	661,822	390,035	496,550	-
<b>Total Operating Revenues</b>		<b>1,429,069,113</b>	<b>855,668,803</b>	<b>186,079,575</b>	<b>341,657,198</b>	<b>2,747,560</b>	<b>-</b>	<b>15,436,862</b>	<b>17,880,974</b>	<b>9,598,140</b>	<b>-</b>
Operating Expenses		Total\$	Production	Transmission	Distribution	Dist-Lighting	Ancillary	C Billing	C Metering	C Service	DSM
Steam Production		251,200,664	251,200,664	-	-	-	-	-	-	-	-
Nuclear Production		-	-	-	-	-	-	-	-	-	-
Hydro Production		12,195,411	12,195,411	-	-	-	-	-	-	-	-
Other Power Supply		367,975,636	367,975,636	-	-	-	-	-	-	-	-
ECD		-	-	-	-	-	-	-	-	-	-
Transmission		59,583,511	207,702	59,377,809	-	-	-	-	-	-	-
Distribution		116,474,578	-	-	113,798,483	898,815	-	-	1,777,279	-	-
Customer Accounts		23,650,478	3,793,292	824,915	1,514,611	12,180	-	9,744,847	3,870,054	3,890,379	-
Customer Service		4,692,219	-	-	2,367,268	-	-	-	-	2,324,952	-
Sales		-	-	-	-	-	-	-	-	-	-
Administrative & General		63,204,272	15,884,877	6,328,518	35,117,243	192,357	-	2,038,499	2,577,399	1,065,379	-
<b>Total O &amp; M Expenses</b>		<b>898,978,769</b>	<b>651,257,582</b>	<b>66,531,242</b>	<b>152,797,604</b>	<b>1,103,353</b>	<b>-</b>	<b>11,783,346</b>	<b>8,224,732</b>	<b>7,280,910</b>	<b>-</b>
Depreciation		287,295,417	183,918,491	40,115,616	58,594,390	829,649	-	549,794	2,987,603	299,875	-
Amortization Expense		34,337,204	5,783,078	1,656,969	20,795,624	45,888	-	2,362,345	2,073,856	1,639,443	-
Taxes Other Than Income		89,848,715	24,393,405	12,572,050	51,281,093	196,584	-	321,497	874,616	209,471	-
Income Taxes - Federal		(69,043,545)	(77,818,868)	1,067,861	7,893,490	244,519	-	(510,858)	448,675	(368,365)	-
Income Taxes - State		(3,423,104)	(2,049,616)	(445,724)	(818,383)	(6,381)	-	(36,977)	(42,831)	(22,991)	-
Income Taxes - Det Net		14,587,854	11,172,889	8,623,289	(5,310,791)	(261,651)	-	416,677	(360,570)	308,010	-
Investment Tax Credit Adj.		-	-	-	-	-	-	-	-	-	-
Misc Revenue & Expense		4,502	(506,624)	(207)	511,333	-	-	-	-	-	-
<b>Total Operating Expenses</b>		<b>1,252,605,813</b>	<b>796,150,337</b>	<b>130,121,097</b>	<b>285,744,360</b>	<b>2,151,760</b>	<b>-</b>	<b>14,885,824</b>	<b>14,206,081</b>	<b>9,346,353</b>	<b>-</b>
<b>Operating Revenue for Return</b>		<b>176,463,300</b>	<b>59,318,466</b>	<b>55,938,478</b>	<b>55,912,839</b>	<b>593,800</b>	<b>-</b>	<b>551,039</b>	<b>3,674,893</b>	<b>251,786</b>	<b>-</b>
Rate Base		Total\$	Production	Transmission	Distribution	Dist-Lighting	Ancillary	C Billing	C Metering	C Service	DSM
Electric Plant in Service		8,832,858,186	3,758,983,683	2,119,481,008	2,693,938,078	33,212,674	-	49,506,025	145,279,057	32,457,663	-
Plant Held for Future Use		-	1,757,792	(561,055)	(1,123,039)	-	-	(36,787)	(36,911)	-	-
Misc Deferred Debits		67,039,001	57,504,396	3,101,941	4,463,903	71,474	-	728,077	768,218	400,993	-
Elec Plant Acq Adj		699,759	699,759	-	-	-	-	-	-	-	-
Nuclear Fuel		-	-	-	-	-	-	-	-	-	-
Prepayments		11,116,576	4,748,693	1,151,164	3,623,273	57,965	-	589,049	621,983	324,448	-
Fuel Stock		37,219,586	37,219,586	-	-	-	-	-	-	-	-
Material & Supplies		81,632,777	66,682,599	1,207,676	13,305,200	-	-	-	-	437,302	-
Working Capital		13,614,617	5,322,108	1,434,758	5,179,919	65,309	-	625,976	634,767	351,781	-
Weatherization Loans		-	-	-	-	-	-	-	-	-	-
Miscellaneous Rate Base		(101,493)	(101,493)	-	-	-	-	-	-	-	-
<b>Total Electric Plant</b>		<b>9,044,079,009</b>	<b>3,932,817,124</b>	<b>2,125,815,492</b>	<b>2,719,387,333</b>	<b>33,407,421</b>	<b>-</b>	<b>51,412,339</b>	<b>147,704,416</b>	<b>33,534,884</b>	<b>-</b>
Rate Base Deductions		Total\$	Production	Transmission	Distribution	Dist-Lighting	Ancillary	C Billing	C Metering	C Service	DSM
Accum Prov For Depr		(3,565,614,879)	(1,736,797,433)	(577,959,187)	(1,198,772,966)	(16,682,364)	-	(3,393,633)	(30,159,039)	(1,848,254)	-
Accum Prov For Amort		(217,778,883)	(72,007,240)	(20,429,304)	(49,051,980)	(765,506)	-	(22,272,047)	(20,995,863)	(22,256,942)	-
Accum Def Income Taxes		(643,328,592)	(313,742,098)	(179,329,639)	(136,607,119)	(1,685,655)	-	(1,307,407)	(7,933,827)	(2,702,846)	-
Unamortized ITC		(45,658)	(18,575)	(3,483)	(16,378)	(262)	-	(2,671)	(2,818)	(1,471)	-
Customer Adv for Const		(22,975,394)	-	(20,905,487)	(1,961,291)	(23,889)	-	-	(84,727)	-	-
Customer Service Deposits		-	-	-	-	-	-	-	-	-	-
Misc Rate Base Deductions		(414,776,627)	(400,548,238)	(1,803,696)	(8,673,871)	(138,139)	-	(1,383,142)	(1,467,767)	(761,774)	-
<b>Total Rate Base Deductions</b>		<b>(4,864,520,032)</b>	<b>(2,523,113,584)</b>	<b>(800,430,797)</b>	<b>(1,395,083,603)</b>	<b>(19,295,816)</b>	<b>-</b>	<b>(38,360,902)</b>	<b>(60,664,042)</b>	<b>(27,571,288)</b>	<b>-</b>
<b>Total Rate Base</b>		<b>4,179,558,977</b>	<b>1,409,703,540</b>	<b>1,325,384,695</b>	<b>1,324,303,730</b>	<b>14,111,605</b>	<b>-</b>	<b>13,051,437</b>	<b>87,040,374</b>	<b>5,963,596</b>	<b>-</b>
<b>Return on Rate Base</b>		<b>4.222%</b>	<b>4.222%</b>	<b>4.222%</b>	<b>4.222%</b>	<b>4.222%</b>	<b>4.222%</b>	<b>4.222%</b>	<b>4.222%</b>	<b>4.222%</b>	<b>0.000%</b>
<b>Return on Equity</b>		<b>3.769%</b>	<b>3.769%</b>	<b>3.769%</b>	<b>3.769%</b>	<b>3.769%</b>	<b>3.769%</b>	<b>3.769%</b>	<b>3.769%</b>	<b>3.769%</b>	<b>0.000%</b>

RESULTS OF OPERATIONS SUMMARY

2020 PROTOCOL				Total\$	Production	Transmission	Distribution	Dist-Lighting	Ancillary	C Billing	C Metering	C Service	DSM
FERC ACCT	DESCRIPTION	BUSINESS FUNCTION	IAM FACTOR										
440	Residential Sales		S	611,665,097	714,186,847	125,865,238	337,550,898	2,744,355	23,847,685	14,775,040	17,490,939	9,101,590	-
	Less Klamath Surcharge Revenue	P	S	-	-	-	-	-	-	-	-	-	-
				<b>611,665,097</b>	<b>714,186,847</b>	<b>125,865,238</b>	<b>337,550,898</b>	<b>2,744,355</b>	<b>23,847,685</b>	<b>14,775,040</b>	<b>17,490,939</b>	<b>9,101,590</b>	<b>-</b>
442	Commercial & Industrial Sales		S	629,606,015	-	-	-	-	-	-	-	-	-
		P	SE	-	-	-	-	-	-	-	-	-	-
		PT	SG	-	-	-	-	-	-	-	-	-	-
				<b>629,606,015</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
444	Public Street & Highway Lighting		S	4,291,482	-	-	-	-	-	-	-	-	-
			SO	-	-	-	-	-	-	-	-	-	-
				<b>4,291,482</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
445	Other Sales to Public Authority		S	-	-	-	-	-	-	-	-	-	-
				<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
448	Interdepartmental		S	-	-	-	-	-	-	-	-	-	-
		D_SPLIT	GP	-	-	-	-	-	-	-	-	-	-
			SO	-	-	-	-	-	-	-	-	-	-
				<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Sales to Ultimate Customers</b>				<b>1,245,562,594</b>	<b>714,186,847</b>	<b>125,865,238</b>	<b>337,550,898</b>	<b>2,744,355</b>	<b>23,847,685</b>	<b>14,775,040</b>	<b>17,490,939</b>	<b>9,101,590</b>	<b>-</b>

447	Sales for Resale-Non NPC	P	S	-	-	-	-	-	-	-	-	-	-
447NPC	Sales for Resale-NPC	P	SG	102,596,785	102,596,785	-	-	-	-	-	-	-	-
		P	SE	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
				102,596,785	102,596,785	-	-	-	-	-	-	-	-
	Total Sales for Resale			102,596,785	102,596,785	-	-	-	-	-	-	-	-
449	Provision for Rate Refund	P	S	-	-	-	-	-	-	-	-	-	-
		P	SG	(842,436)	(842,436)	-	-	-	-	-	-	-	-
				(842,436)	(842,436)	-	-	-	-	-	-	-	-
	<b>Total Sales from Electricity</b>			<b>1,347,316,943</b>	<b>815,941,197</b>	<b>125,865,238</b>	<b>337,550,898</b>	<b>2,744,355</b>	<b>23,847,685</b>	<b>14,775,040</b>	<b>17,490,939</b>	<b>9,101,590</b>	-
450	Forfeited Discounts & Interest	C_BILLING	S	(19,497)	-	-	-	-	-	(19,497)	-	-	-
		C_BILLING	SO	-	-	-	-	-	-	-	-	-	-
				(19,497)	-	-	-	-	-	(19,497)	-	-	-
451	Misc Electric Revenue	CSS_SYS	S	1,526,034	-	-	-	-	-	676,542	356,075	493,418	-
		C_METER	S	19,942	-	-	-	-	-	-	19,942	-	-
		GP	SG	-	-	-	-	-	-	-	-	-	-
		DSM	SO	14,329	-	-	14,329	-	-	-	-	-	-
				1,560,305	-	-	14,329	-	-	676,542	376,017	493,418	-
453	Water Sales	P	SG	1,911	1,911	-	-	-	-	-	-	-	-
				1,911	1,911	-	-	-	-	-	-	-	-
454	Rent of Electric Property	D	S	4,606,685	-	-	4,606,685	-	-	-	-	-	-
		T	SG	1,265,679	-	1,265,679	-	-	-	-	-	-	-
		GP	SO	852,305	362,714	204,514	259,945	3,205	-	4,777	14,018	3,132	-
				6,724,669	362,714	1,470,193	4,866,630	3,205	-	4,777	14,018	3,132	-
	Oregon Ancillary Services				23,847,685				(23,847,685)				
456	Other Electric Revenue	OTHSGR	S	27,911,738	6,401,311	21,509,621	807	-	-	-	-	-	-
		C_BILLING	CN	-	-	-	-	-	-	-	-	-	-
		OTHSO	SE	6,609,800	-	6,609,800	-	-	-	-	-	-	-
		OTHSO	SO	(776,615)	-	-	(776,615)	-	-	-	-	-	-
		OTHSGR	SG	39,739,858	9,113,986	30,624,723	1,149	-	-	-	-	-	-
				73,484,780	15,515,296	58,744,144	(774,660)	-	-	-	-	-	-
	<b>Total Other Electric Revenue:</b>			<b>81,752,170</b>	<b>39,727,606</b>	<b>60,214,337</b>	<b>4,106,300</b>	<b>3,205</b>	<b>(23,847,685)</b>	<b>661,822</b>	<b>390,035</b>	<b>496,550</b>	-
	<b>Total Electric Operating Revenues:</b>			<b>1,429,069,113</b>	<b>855,668,803</b>	<b>186,079,575</b>	<b>341,657,198</b>	<b>2,747,560</b>	-	<b>15,436,862</b>	<b>17,880,974</b>	<b>9,598,140</b>	-
<b>Miscellaneous Revenues</b>													
41160	Gain on Sale of Utility Plant - CR	D	S	-	-	-	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
		G	SO	-	-	-	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
41170	Loss on Sale of Utility Plant	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
4118	Gain from Emission Allowances	P	S	-	-	-	-	-	-	-	-	-	-
		P	SE	(12)	(12)	-	-	-	-	-	-	-	-
				(12)	(12)	-	-	-	-	-	-	-	-
41181	Gain from Disposition of NOX Credits	P	SE	-	-	-	-	-	-	-	-	-	-
4194	Impact Housing Interest Income	P	SG	-	-	-	-	-	-	-	-	-	-
421	(Gain) / Loss on Sale of Utility Plant	D	S	511,579	-	-	511,579	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
		B_Center	CN	-	-	-	-	-	-	-	-	-	-
		PTD	SO	(800)	-	(207)	(246)	-	-	-	-	-	-
		P	SG	(506,265)	(506,612)	-	-	-	-	-	-	-	-
				4,514	(506,612)	(207)	511,333	-	-	-	-	-	-
	<b>Total Miscellaneous Revenues:</b>			<b>4,502</b>	<b>(506,624)</b>	<b>(207)</b>	<b>511,333</b>	-	-	-	-	-	-
<b>Miscellaneous Expenses</b>													
4311	Interest on Customer Deposits	C_BILLING	S	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
	<b>Total Miscellaneous Expenses:</b>			-	-	-	-	-	-	-	-	-	-
	<b>Net Misc Revenue and Expense</b>			<b>4,502</b>	<b>(506,624)</b>	<b>(207)</b>	<b>511,333</b>	-	-	-	-	-	-
500	Operation Supervision & Engineering	P	SG	3,823,246	3,823,246	-	-	-	-	-	-	-	-
		P	SG	307,179	307,179	-	-	-	-	-	-	-	-
		P	SG	(15)	(15)	-	-	-	-	-	-	-	-
				4,130,410	4,130,410	-	-	-	-	-	-	-	-
501	Fuel Related-Non NPC	P	S	5,360,860	5,360,860	-	-	-	-	-	-	-	-
		P	SE	8,161,382	8,161,382	-	-	-	-	-	-	-	-
		P	SE	-	-	-	-	-	-	-	-	-	-

	P	SE	-	-	-	-	-	-	-	-	-
	P	SE	71,802	71,802	-	-	-	-	-	-	-
	P	SE	-	-	-	-	-	-	-	-	-
			13,594,044	13,594,044	-	-	-	-	-	-	-
501NPC	Fuel Related-NPC										
	P	S	-	-	-	-	-	-	-	-	-
	P	SE	157,530,631	157,530,631	-	-	-	-	-	-	-
	P	SE	-	-	-	-	-	-	-	-	-
	P	SE	-	-	-	-	-	-	-	-	-
	P	SE	7,735,400	7,735,400	-	-	-	-	-	-	-
	P	SE	-	-	-	-	-	-	-	-	-
			165,266,031	165,266,031	-	-	-	-	-	-	-
	Total Fuel Related		178,860,075	178,860,075	-	-	-	-	-	-	-
502	Steam Expenses										
	P	SG	21,239,374	21,239,374	-	-	-	-	-	-	-
	P	SG	1,307,872	1,307,872	-	-	-	-	-	-	-
	P	SG	0	0	-	-	-	-	-	-	-
			22,547,246	22,547,246	-	-	-	-	-	-	-
503	Steam From Other Sources-Non-NPC										
	P	SE	(654)	(654)	-	-	-	-	-	-	-
			(654)	(654)	-	-	-	-	-	-	-
503NPC	Steam From Other Sources-NPC										
	P	SE	1,117,446	1,117,446	-	-	-	-	-	-	-
			1,117,446	1,117,446	-	-	-	-	-	-	-
505	Electric Expenses										
	P	SG	294,531	294,531	-	-	-	-	-	-	-
	P	SG	37,152	37,152	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-
			331,684	331,684	-	-	-	-	-	-	-
506	Misc. Steam Expense										
	P	SG	16,019,548	16,019,548	-	-	-	-	-	-	-
	P	SG	(14,170,038)	(14,170,038)	-	-	-	-	-	-	-
	P	SG	410,315	410,315	-	-	-	-	-	-	-
			2,259,825	2,259,825	-	-	-	-	-	-	-
507	Rents										
	P	SG	132,174	132,174	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-
	P	SG	67	67	-	-	-	-	-	-	-
			132,241	132,241	-	-	-	-	-	-	-
510	Maint Supervision & Engineering										
	P	SG	1,677,786	1,677,786	-	-	-	-	-	-	-
	P	SG	312,966	312,966	-	-	-	-	-	-	-
	P	SG	173,793	173,793	-	-	-	-	-	-	-
			2,164,546	2,164,546	-	-	-	-	-	-	-
511	Maintenance of Structures										
	P	SG	6,322,956	6,322,956	-	-	-	-	-	-	-
	P	SG	749,633	749,633	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-
			7,072,588	7,072,588	-	-	-	-	-	-	-
512	Maintenance of Boiler Plant										
	P	SG	19,541,521	19,541,521	-	-	-	-	-	-	-
	P	SG	513,115	513,115	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-
			20,054,635	20,054,635	-	-	-	-	-	-	-
513	Maintenance of Electric Plant										
	P	SG	8,942,251	8,942,251	-	-	-	-	-	-	-
	P	SG	88,460	88,460	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-
			9,030,712	9,030,712	-	-	-	-	-	-	-
514	Maintenance of Misc. Steam Plant										
	P	SG	3,069,878	3,069,878	-	-	-	-	-	-	-
	P	SG	430,040	430,040	-	-	-	-	-	-	-
	P	SG	(6)	(6)	-	-	-	-	-	-	-
			3,499,911	3,499,911	-	-	-	-	-	-	-
	Total Steam Power Generation		251,200,664	251,200,664	-	-	-	-	-	-	-
517	Operation Super & Engineering										
	P	SG	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
518	Nuclear Fuel Expense										
	P	SE	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
519	Coolants and Water										
	P	SG	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
520	Steam Expenses										
	P	SG	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
523	Electric Expenses										
	P	SG	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
524	Misc. Nuclear Expenses										
	P	SG	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
528	Maintenance Super & Engineering										
	P	SG	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
529	Maintenance of Structures										
	P	SG	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-

530	Maintenance of Reactor Plant	P	SG	-	-	-	-	-	-	-	-	-	-
531	Maintenance of Electric Plant	P	SG	-	-	-	-	-	-	-	-	-	-
532	Maintenance of Misc Nuclear	P	SG	-	-	-	-	-	-	-	-	-	-
<b>Total Nuclear Power Generation</b>				-	-	-	-	-	-	-	-	-	-
535	Operation Super & Engineering	P	SG	(15)	(15)	-	-	-	-	-	-	-	-
		P	SG	(638)	(638)	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	2,655,486	2,655,486	-	-	-	-	-	-	-	-
		P	SG	431,814	431,814	-	-	-	-	-	-	-	-
				3,086,647	3,086,647	-	-	-	-	-	-	-	-
536	Water For Power	P	DGP	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	83,746	83,746	-	-	-	-	-	-	-	-
				83,746	83,746	-	-	-	-	-	-	-	-
537	Hydraulic Expenses	P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	1,187,551	1,187,551	-	-	-	-	-	-	-	-
		P	SG	90,865	90,865	-	-	-	-	-	-	-	-
				1,278,416	1,278,416	-	-	-	-	-	-	-	-
538	Electric Expenses	P	DGP	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
539	Misc. Hydro Expenses	P	SG	15	15	-	-	-	-	-	-	-	-
		P	SG	3,307,671	3,307,671	-	-	-	-	-	-	-	-
		P	SG	1,821,620	1,821,620	-	-	-	-	-	-	-	-
				5,129,306	5,129,306	-	-	-	-	-	-	-	-
540	Rents (Hydro Generation)	P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	410,468	410,468	-	-	-	-	-	-	-	-
		P	SG	18,323	18,323	-	-	-	-	-	-	-	-
				428,791	428,791	-	-	-	-	-	-	-	-
541	Maint Supervision & Engineering	P	DGP	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	114	114	-	-	-	-	-	-	-	-
				114	114	-	-	-	-	-	-	-	-
542	Maintenance of Structures	P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	213,664	213,664	-	-	-	-	-	-	-	-
		P	SG	20,674	20,674	-	-	-	-	-	-	-	-
				234,338	234,338	-	-	-	-	-	-	-	-
543	Maintenance of Dams & Waterways	P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	199,398	199,398	-	-	-	-	-	-	-	-
		P	SG	102,431	102,431	-	-	-	-	-	-	-	-
				301,829	301,829	-	-	-	-	-	-	-	-
544	Maintenance of Electric Plant	P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	463,615	463,615	-	-	-	-	-	-	-	-
		P	SG	70,803	70,803	-	-	-	-	-	-	-	-
				534,418	534,418	-	-	-	-	-	-	-	-
545	Maintenance of Misc. Hydro Plant	P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	873,192	873,192	-	-	-	-	-	-	-	-
		P	SG	244,614	244,614	-	-	-	-	-	-	-	-
				1,117,806	1,117,806	-	-	-	-	-	-	-	-
<b>Total Hydraulic Power Generation</b>				<b>12,195,411</b>	<b>12,195,411</b>	-	-	-	-	-	-	-	-
546	Operation Super & Engineering	P	SG	91,007	91,007	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	(2)	(2)	-	-	-	-	-	-	-	-
				91,003	91,003	-	-	-	-	-	-	-	-
547	Fuel-Non-NPC	P	SE	-	-	-	-	-	-	-	-	-	-
		P	SE	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
547NPC	Fuel-NPC	P	SE	85,083,728	85,083,728	-	-	-	-	-	-	-	-

	P	SE	493,441	493,441	-	-	-	-	-	-	-	-
			85,577,169	85,577,169	-	-	-	-	-	-	-	-
548	Generation Expense											
	P	SG	4,968,716	4,968,716	-	-	-	-	-	-	-	-
	P	SG	107,969	107,969	-	-	-	-	-	-	-	-
	P	SG	(79)	(79)	-	-	-	-	-	-	-	-
			5,076,606	5,076,606	-	-	-	-	-	-	-	-
549	Miscellaneous Other											
	P	S	34,768	34,768	-	-	-	-	-	-	-	-
	P	SG	1,111,990	1,111,990	-	-	-	-	-	-	-	-
	P	SG	1,273,488	1,273,488	-	-	-	-	-	-	-	-
	P	SG	(8,739)	(8,739)	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			2,411,507	2,411,507	-	-	-	-	-	-	-	-
550	Maint Supervision & Engineering											
	P	S	412,870	412,870	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	SG	11,594	11,594	-	-	-	-	-	-	-	-
	P	SG	2,109,968	2,109,968	-	-	-	-	-	-	-	-
			2,534,432	2,534,432	-	-	-	-	-	-	-	-
551	Maint Supervision & Engineering											
	P	SG	-	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-	-
552	Maintenance of Structures											
	P	SG	660,043	660,043	-	-	-	-	-	-	-	-
	P	SG	14,789	14,789	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			674,832	674,832	-	-	-	-	-	-	-	-
553	Maint of Generation & Electric Plant											
	P	SG	1,108,387	1,108,387	-	-	-	-	-	-	-	-
	P	SG	3,268,006	3,268,006	-	-	-	-	-	-	-	-
	P	SG	67,954	67,954	-	-	-	-	-	-	-	-
	P	SG	608,174	608,174	-	-	-	-	-	-	-	-
			5,052,520	5,052,520	-	-	-	-	-	-	-	-
554	Maintenance of Misc. Other											
	P	SG	605,835	605,835	-	-	-	-	-	-	-	-
	P	SG	297,773	297,773	-	-	-	-	-	-	-	-
	P	SG	21,573	21,573	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			925,180	925,180	-	-	-	-	-	-	-	-
	<b>Total Other Power Generation</b>		<b>102,343,249</b>	<b>102,343,249</b>	-	-	-	-	-	-	-	-
555	Purchased Power-Non NPC											
	P	S	-	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-	-
555NPC	Purchased Power-NPC											
	P	S	2,571,370	2,571,370	-	-	-	-	-	-	-	-
	P	SG	249,388,639	249,388,639	-	-	-	-	-	-	-	-
	P	SE	11,193,250	11,193,250	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	DGP	-	-	-	-	-	-	-	-	-	-
			263,153,259	263,153,259	-	-	-	-	-	-	-	-
	<b>Total Purchased Power</b>		<b>263,153,259</b>	<b>263,153,259</b>	-	-	-	-	-	-	-	-
556	System Control & Load Dispatch											
	P	SG	167,169	167,169	-	-	-	-	-	-	-	-
			167,169	167,169	-	-	-	-	-	-	-	-
557	Other Expenses											
	P	S	3,334,956	3,334,956	-	-	-	-	-	-	-	-
	P	SG	9,974,673	9,974,673	-	-	-	-	-	-	-	-
	P	SGCT	-	-	-	-	-	-	-	-	-	-
	P	SE	2,330	2,330	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	TROIP	-	-	-	-	-	-	-	-	-	-
			13,311,959	13,311,959	-	-	-	-	-	-	-	-
2017 Protocol Adjustment												
Baseline ECD	P	S	(11,000,000)	(11,000,000)	-	-	-	-	-	-	-	-
Equalization Adj.	P	S	(11,000,000)	(11,000,000)	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-	-
	<b>Total Other Power Supply</b>		<b>265,632,387</b>	<b>265,632,387</b>	-	-	-	-	-	-	-	-
<b>TOTAL PRODUCTION EXPENSE</b>			<b>631,371,711</b>	<b>631,371,711</b>	-	-	-	-	-	-	-	-
Embedded Cost Differentials												
Company Owned	P	DGP	-	-	-	-	-	-	-	-	-	-
Company Owned	P	SG	-	-	-	-	-	-	-	-	-	-
Mid-C Contract	P	MC	-	-	-	-	-	-	-	-	-	-
Mid-C Contract	P	SG	-	-	-	-	-	-	-	-	-	-
Existing QF Cost	P	S	-	-	-	-	-	-	-	-	-	-
Existing QF Cost	P	SG	-	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-	-
Hydro Endowment Fixed Dollar Proposal												
Klamath Surcharge S2	P	S	-	-	-	-	-	-	-	-	-	-
ECD Hydro	P	S	-	-	-	-	-	-	-	-	-	-
Mid-C Contract	P	MC	-	-	-	-	-	-	-	-	-	-
Mid-C Contract	P	SG	-	-	-	-	-	-	-	-	-	-
Klamath Dam Removal	P	S	-	-	-	-	-	-	-	-	-	-
Less Klamath Surcharge Expense	P	SG	-	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-	-
560	Operation Supervision & Engineering											
	T	SG	2,477,738	2,477,738	-	-	-	-	-	-	-	-
	T	SG	(248)	(248)	-	-	-	-	-	-	-	-

				2,477,490	-	2,477,490	-	-	-	-	-	-	-
561	Load Dispatching	T	SG	4,919,401	-	4,919,401	-	-	-	-	-	-	-
		T	SG	(40)	-	(40)	-	-	-	-	-	-	-
				4,919,361	-	4,919,361	-	-	-	-	-	-	-
562	Station Expense	T	SG	894,505	-	894,505	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
				894,505	-	894,505	-	-	-	-	-	-	-
563	Overhead Line Expense	T	SG	266,228	-	266,228	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
				266,228	-	266,228	-	-	-	-	-	-	-
564	Underground Line Expense	T	SG	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
565	Transmission of Electricity by Others-Non NPC	T	SG	-	-	-	-	-	-	-	-	-	-
		T	SE	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
565NPC	Transmission of Electricity by Others-NPC	T	SG	38,594,010	-	38,594,010	-	-	-	-	-	-	-
		T	SE	1,717,733	-	1,717,733	-	-	-	-	-	-	-
				40,311,743	-	40,311,743	-	-	-	-	-	-	-
	Total Transmission of Electricity by Others			40,311,743	-	40,311,743	-	-	-	-	-	-	-
566	Misc. Transmission Expense	T	SG	1,004,735	-	1,004,735	-	-	-	-	-	-	-
		T	SG	(1,233,314)	-	(1,233,314)	-	-	-	-	-	-	-
				(228,579)	-	(228,579)	-	-	-	-	-	-	-
567	Rents - Transmission	T	SG	690,737	-	690,737	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
				690,737	-	690,737	-	-	-	-	-	-	-
568	Maint Supervision & Engineering	T	SG	231,858	-	231,858	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
				231,858	-	231,858	-	-	-	-	-	-	-
569	Maintenance of Structures	T	SG	1,511,538	-	1,511,538	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
				1,511,538	-	1,511,538	-	-	-	-	-	-	-
570	Maintenance of Station Equipment	STEP_UP	SG	2,953,943	207,702	2,746,241	-	-	-	-	-	-	-
		STEP_UP	SG	(0)	(0)	(0)	-	-	-	-	-	-	-
				2,953,943	207,702	2,746,241	-	-	-	-	-	-	-
571	Maintenance of Overhead Lines	T	SG	5,249,669	-	5,249,669	-	-	-	-	-	-	-
		T	SG	203,329	-	203,329	-	-	-	-	-	-	-
				5,452,998	-	5,452,998	-	-	-	-	-	-	-
572	Maintenance of Underground Lines	T	SG	50,065	-	50,065	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
				50,065	-	50,065	-	-	-	-	-	-	-
573	Maint of Misc. Transmission Plant	T	SG	53,604	-	53,604	-	-	-	-	-	-	-
		T	SG	-	-	-	-	-	-	-	-	-	-
				53,604	-	53,604	-	-	-	-	-	-	-
	<b>TOTAL TRANSMISSION EXPENSE</b>			<b>59,585,511</b>	<b>207,702</b>	<b>59,377,809</b>	-	-	-	-	-	-	-
580	Operation Supervision & Engineering	D_SPLIT	S	457,261	-	-	433,267	5,277	-	-	-	18,717	-
		D_SPLIT	SNPD	2,282,835	-	-	2,163,046	26,346	-	-	-	93,443	-
				2,740,096	-	-	2,596,313	31,624	-	-	-	112,160	-
581	Load Dispatching	D	S	-	-	-	-	-	-	-	-	-	-
		D	SNPD	3,566,379	-	-	3,566,379	-	-	-	-	-	-
				3,566,379	-	-	3,566,379	-	-	-	-	-	-
582	Station Expense	D	S	1,198,280	-	-	1,198,280	-	-	-	-	-	-
		D	SNPD	4,971	-	-	4,971	-	-	-	-	-	-
				1,203,251	-	-	1,203,251	-	-	-	-	-	-
583	Overhead Line Expenses	D	S	1,903,111	-	-	1,903,111	-	-	-	-	-	-
		D	SNPD	47	-	-	47	-	-	-	-	-	-
				1,903,158	-	-	1,903,158	-	-	-	-	-	-
584	Underground Line Expense	D	S	456	-	-	456	-	-	-	-	-	-
		D	SNPD	-	-	-	-	-	-	-	-	-	-
				456	-	-	456	-	-	-	-	-	-
585	Street Lighting & Signal Systems	DL	S	-	-	-	-	-	-	-	-	-	-
		DL	SNPD	91,479	-	-	-	91,479	-	-	-	-	-
				91,479	-	-	-	91,479	-	-	-	-	-
586	Meter Expenses	C_Meter	S	1,357,738	-	-	-	-	-	-	-	1,357,738	-
		C_Meter	SNPD	-	-	-	-	-	-	-	-	-	-
				1,357,738	-	-	-	-	-	-	-	1,357,738	-
587	Customer Installation Expenses	D	S	6,776,917	-	-	6,776,917	-	-	-	-	-	-
		D	SNPD	-	-	-	-	-	-	-	-	-	-
				6,776,917	-	-	6,776,917	-	-	-	-	-	-



588	Misc. Distribution Expenses	D	S	(123,652)	-	-	(123,652)	-	-	-	-	-	-
		D	SNPD	168,460	-	-	168,460	-	-	-	-	-	-
				44,808	-	-	44,808	-	-	-	-	-	-
589	Rents	D	S	2,045,852	-	-	2,045,852	-	-	-	-	-	-
		D	SNPD	7,343	-	-	7,343	-	-	-	-	-	-
				2,053,195	-	-	2,053,195	-	-	-	-	-	-
590	Maint Supervision & Engineering	D_SPLIT	S	884,417	-	-	838,008	10,207	-	-	36,202	-	-
		D_SPLIT	SNPD	715,544	-	-	677,997	8,238	-	-	29,289	-	-
				1,599,961	-	-	1,516,004	18,465	-	-	65,491	-	-
591	Maintenance of Structures	D	S	584,288	-	-	584,288	-	-	-	-	-	-
		D	SNPD	18,442	-	-	18,442	-	-	-	-	-	-
				602,730	-	-	602,730	-	-	-	-	-	-
592	Maintenance of Station Equipment	D	S	2,963,425	-	-	2,963,425	-	-	-	-	-	-
		D	SNPD	445,259	-	-	445,259	-	-	-	-	-	-
				3,408,683	-	-	3,408,683	-	-	-	-	-	-
593	Maintenance of Overhead Lines	D	S	79,890,862	-	-	79,890,862	-	-	-	-	-	-
		D	SNPD	879,196	-	-	879,196	-	-	-	-	-	-
				80,770,059	-	-	80,770,059	-	-	-	-	-	-
594	Maintenance of Underground Lines	D	S	7,878,812	-	-	7,878,812	-	-	-	-	-	-
		D	SNPD	6,663	-	-	6,663	-	-	-	-	-	-
				7,885,475	-	-	7,885,475	-	-	-	-	-	-
595	Maintenance of Line Transformers	D	S	-	-	-	-	-	-	-	-	-	-
		D	SNPD	312,879	-	-	312,879	-	-	-	-	-	-
				312,879	-	-	312,879	-	-	-	-	-	-
596	Maint of Street Lighting & Signal Sys.	DL	S	757,247	-	-	-	757,247	-	-	-	-	-
		DL	SNPD	-	-	-	-	-	-	-	-	-	-
				757,247	-	-	-	757,247	-	-	-	-	-
597	Maintenance of Meters	C_Meter	S	231,678	-	-	-	-	-	-	231,678	-	-
		C_Meter	SNPD	10,213	-	-	-	-	-	-	10,213	-	-
				241,891	-	-	-	-	-	-	241,891	-	-
598	Maint of Misc. Distribution Plant	D	S	(294,111)	-	-	(294,111)	-	-	-	-	-	-
		D	SNPD	1,452,287	-	-	1,452,287	-	-	-	-	-	-
				1,158,176	-	-	1,158,176	-	-	-	-	-	-
	<b>TOTAL DISTRIBUTION EXPENSE</b>			<b>116,474,578</b>	-	-	<b>113,798,483</b>	<b>898,815</b>	-	-	<b>1,777,279</b>	-	-
901	Supervision	CUST901	S	-	-	-	-	-	-	-	-	-	-
		CUST901	CN	750,114	-	-	-	-	336,067	-	363,161	50,886	-
				750,114	-	-	-	-	336,067	-	363,161	50,886	-
902	Meter Reading Expense	C_Meter	S	2,496,921	-	-	-	-	-	-	2,496,921	-	-
		C_Meter	CN	128,991	-	-	-	-	-	-	128,991	-	-
				2,625,912	-	-	-	-	-	-	2,625,912	-	-
903	Customer Receipts & Collections	CUST903	S	819,548	-	-	-	-	549,507	-	47,166	222,875	-
		CUST903	CN	13,110,873	-	-	-	-	8,790,840	-	754,546	3,565,487	-
				13,930,421	-	-	-	-	9,340,347	-	801,712	3,788,362	-
904	Uncollectible Accounts	REVREQ	S	6,286,577	3,764,148	818,577	1,502,974	12,087	-	67,908	78,660	42,223	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		REVREQ	CN	48,674	29,144	6,338	11,637	94	-	526	609	327	-
				6,335,251	3,793,292	824,915	1,514,611	12,180	-	68,434	79,269	42,550	-
905	Misc. Customer Accounts Expense	CUST905	S	-	-	-	-	-	-	-	-	-	-
		CUST905	CN	8,781	-	-	-	-	-	-	-	8,781	-
				8,781	-	-	-	-	-	-	-	8,781	-
	<b>TOTAL CUSTOMER ACCOUNTS EXPENSE</b>			<b>23,650,478</b>	<b>3,793,292</b>	<b>824,915</b>	<b>1,514,611</b>	<b>12,180</b>	-	<b>9,744,847</b>	<b>3,870,054</b>	<b>3,890,579</b>	-
907	Supervision	C_Service	S	-	-	-	-	-	-	-	-	-	-
		C_Service	CN	955	-	-	-	-	-	-	-	955	-
				955	-	-	-	-	-	-	-	955	-
908	Customer Assistance	DSM	S	2,367,268	-	-	2,367,268	-	-	-	-	-	-
		C_Service	CN	664,941	-	-	-	-	-	-	-	664,941	-
				3,032,209	-	-	2,367,268	-	-	-	-	664,941	-
909	Informational & Instructional Adv	C_Service	S	809,790	-	-	-	-	-	-	-	809,790	-
		C_Service	CN	848,655	-	-	-	-	-	-	-	848,655	-
				1,658,445	-	-	-	-	-	-	-	1,658,445	-
910	Misc. Customer Service	C_Service	S	-	-	-	-	-	-	-	-	-	-
		C_Service	CN	611	-	-	-	-	-	-	-	611	-
				611	-	-	-	-	-	-	-	611	-
	<b>TOTAL CUSTOMER SERVICE EXPENSE</b>			<b>4,692,219</b>	-	-	<b>2,367,268</b>	-	-	-	-	<b>2,324,952</b>	-
911	Supervision	P	S	-	-	-	-	-	-	-	-	-	-
		P	CN	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
912	Demonstration & Selling Expense												

	P	S	-	-	-	-	-	-	-	-	-
	P	CN	-	-	-	-	-	-	-	-	-
913	Advertising Expense										
	P	S	-	-	-	-	-	-	-	-	-
	P	CN	-	-	-	-	-	-	-	-	-
916	Misc. Sales Expense										
	P	S	-	-	-	-	-	-	-	-	-
	P	CN	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
<b>TOTAL SALES EXPENSE</b>			-	-	-	-	-	-	-	-	-
<b>Total Customer Service Exp Including Sales</b>			<b>4,692,219</b>	-	-	<b>2,367,268</b>	-	-	-	-	<b>2,324,952</b>
920	Administrative & General Salaries										
	LABOR	S	741,792	301,790	56,591	266,066	4,260	43,396	45,789	23,901	-
	LABOR	CN	-	-	-	-	-	-	-	-	-
	LABOR	SO	21,988,577	8,945,798	1,677,501	7,886,857	126,280	1,286,371	1,357,293	708,477	-
			22,730,370	9,247,588	1,734,093	8,152,923	130,540	1,329,767	1,403,082	732,378	-
921	Office Supplies & expenses										
	LABOR	S	2,005,777	816,027	153,020	719,432	11,519	117,342	123,811	64,627	-
	LABOR	CN	29,458	11,985	2,247	10,566	169	1,723	1,818	949	-
	LABOR	SO	2,778,145	1,130,256	211,844	996,464	15,955	162,526	171,487	89,512	-
			4,813,380	1,958,268	367,211	1,726,462	27,643	281,591	297,116	155,088	-
922	Office Supplies & expenses										
	LABOR	S	-	-	-	-	-	-	-	-	-
	LABOR	CN	-	-	-	-	-	-	-	-	-
	LABOR	SO	(10,803,981)	(4,395,474)	(824,232)	(3,871,169)	(62,047)	(632,052)	(666,899)	(348,107)	-
			(10,803,981)	(4,395,474)	(824,232)	(3,871,169)	(62,047)	(632,052)	(666,899)	(348,107)	-
923	Outside Services										
	LABOR	S	247,116	100,536	18,852	88,636	1,419	14,457	15,254	7,962	-
	LABOR	CN	-	-	-	-	-	-	-	-	-
	LABOR	SO	6,628,120	2,696,574	505,637	2,377,372	38,065	387,757	409,135	213,560	-
			6,875,236	2,797,110	524,510	2,466,008	39,484	402,214	424,389	221,522	-
924	Property Insurance										
	DPW	S	11,846,070	-	-	11,469,115	-	-	376,955	-	-
	PT	SG	-	-	-	-	-	-	-	-	-
	GP	SO	979,911	417,019	235,134	298,864	3,685	5,492	16,117	3,601	-
			12,825,981	417,019	235,134	11,767,978	3,685	5,492	393,072	3,601	-
925	Injuries & Damages										
	DPW	S	1,605,846	-	-	1,554,747	-	-	51,100	-	-
	LABOR	SO	8,964,277	3,647,012	683,882	3,215,305	51,482	524,426	533,340	288,831	-
			10,570,124	3,647,012	683,882	4,770,051	51,482	524,426	604,439	288,831	-
926	Employee Pensions & Benefits										
	LABOR	S	174,852	71,136	13,339	62,716	1,004	10,229	10,793	5,634	-
	LABOR	CN	-	-	-	-	-	-	-	-	-
	LABOR	SO	34,180,099	13,905,777	2,607,589	12,239,708	196,296	1,999,397	2,109,841	1,101,290	-
			34,354,951	13,976,914	2,620,928	12,322,424	197,300	2,009,626	2,120,634	1,106,924	-
927	Franchise Requirements										
	DSM	S	-	-	-	-	-	-	-	-	-
	DSM	SG	-	-	-	-	-	-	-	-	-
928	Regulatory Commission Expense										
	D	S	6,137,001	-	-	6,137,001	-	-	-	-	-
	P	SE	-	-	-	-	-	-	-	-	-
	D	SO	669,249	-	-	669,249	-	-	-	-	-
	FERC	SG	1,236,795	497,228	739,567	-	-	-	-	-	-
			8,043,046	497,228	739,567	6,806,251	-	-	-	-	-
929	Duplicate Charges										
	LABOR	S	-	-	-	-	-	-	-	-	-
	LABOR	SO	(34,017,261)	(13,839,529)	(2,595,166)	(12,201,302)	(195,361)	(1,990,070)	(2,099,790)	(1,096,044)	-
			(34,017,261)	(13,839,529)	(2,595,166)	(12,201,302)	(195,361)	(1,990,070)	(2,099,790)	(1,096,044)	-
930	Misc General Expenses										
	LABOR	S	(1,669,716)	(679,305)	(127,382)	(598,893)	(9,589)	(97,681)	(103,067)	(53,799)	-
	C_SERVICE	CN	-	-	-	-	-	-	-	-	-
	LABOR	SO	492,750	200,470	37,592	176,740	2,830	28,827	30,416	15,877	-
			(1,176,966)	(478,835)	(89,790)	(422,154)	(6,759)	(68,853)	(72,651)	(37,922)	-
931	Rents										
	LABOR	S	499,156	203,076	38,080	179,037	2,867	29,202	30,811	16,083	-
	LABOR	SO	613,434	249,569	46,799	220,026	3,523	35,887	37,866	19,765	-
			1,112,590	452,645	84,879	399,064	6,390	65,089	68,677	35,848	-
935	Maintenance of General Plant										
	G	S	162,835	33,218	58,936	66,329	-	2,173	2,180	-	-
	B_Center	CN	9,355	-	-	-	-	6,094	-	3,261	-
	G	SO	7,704,613	1,571,715	2,788,568	3,138,378	-	102,804	103,149	-	-
			7,876,803	1,604,933	2,847,503	3,204,707	-	111,071	105,329	3,261	-
<b>TOTAL ADMINISTRATIVE &amp; GEN EXPENSE</b>			<b>63,204,272</b>	<b>15,884,877</b>	<b>6,328,518</b>	<b>35,117,243</b>	<b>192,357</b>	<b>2,038,499</b>	<b>2,577,399</b>	<b>1,065,379</b>	-
<b>TOTAL O&amp;M EXPENSE</b>			<b>898,978,769</b>	<b>651,257,582</b>	<b>66,531,242</b>	<b>152,797,604</b>	<b>1,103,353</b>	<b>11,783,346</b>	<b>8,224,732</b>	<b>7,280,910</b>	-
403SP	Steam Depreciation										
	P	SG	10,510,019	10,510,019	-	-	-	-	-	-	-
	P	SG	8,739,606	8,739,606	-	-	-	-	-	-	-
	P	SG	94,675,952	94,675,952	-	-	-	-	-	-	-
	P	SG	1,973,454	1,973,454	-	-	-	-	-	-	-
			115,899,032	115,899,032	-	-	-	-	-	-	-
403NP	Nuclear Depreciation										
	P	SG	-	-	-	-	-	-	-	-	-
403HP	Hydro Depreciation										
	P	SG	(6,288,576)	(6,288,576)	-	-	-	-	-	-	-
	P	SG	350,670	350,670	-	-	-	-	-	-	-
	P	SG	12,628,163	12,628,163	-	-	-	-	-	-	-
	P	SG	2,283,199	2,283,199	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-
			8,973,457	8,973,457	-	-	-	-	-	-	-





D	SNPD	-	-	-	-	-	-	-	-	
CSS_SYS	CN	3,715	-	-	-	-	1,647	867	1,201	
P	SGCT	-	-	-	-	-	-	-	-	
BOOKDEPR	SCHMDEXP	(65,094,255)	(43,566,046)	(8,786,370)	(12,111,492)	(171,487)	(60,794)	(398,068)	-	
P	TROJD	(0)	(0)	-	-	-	-	-	-	
IBT	IBT	-	-	-	-	-	-	-	-	
P	SG	(150,808)	(150,808)	-	-	-	-	-	-	
GP	GPS	-	-	-	-	-	-	-	-	
P	SG	-	-	-	-	-	-	-	-	
P	SG	-	-	-	-	-	-	-	-	
P	SG	-	-	-	-	-	-	-	-	
		(96,402,045)	(55,061,085)	(14,791,401)	(24,773,428)	(326,586)	(246,660)	(1,089,249)	(113,637)	
<b>TOTAL DEFERRED INCOME TAXES</b>		<b>14,587,854</b>	<b>11,172,889</b>	<b>8,623,289</b>	<b>(3,310,791)</b>	<b>(261,651)</b>	<b>416,677</b>	<b>(360,570)</b>	<b>308,010</b>	
SCHMAF	Additions - Flow Through	-	-	-	-	-	-	-	-	
SCHMAF	S	-	-	-	-	-	-	-	-	
SCHMAF	SNP	-	-	-	-	-	-	-	-	
SCHMAF	SO	-	-	-	-	-	-	-	-	
SCHMAF	SE	-	-	-	-	-	-	-	-	
P	TROIP	-	-	-	-	-	-	-	-	
SCHMAF	SG	-	-	-	-	-	-	-	-	
SCHMAP	Additions - Permanent	-	-	-	-	-	-	-	-	
P	S	-	-	-	-	-	-	-	-	
P	SE	11,204	11,204	-	-	-	-	-	-	
PTD	SNP	-	-	-	-	-	-	-	-	
SCHMAP-SO	SO	793,141	599,596	24,893	117,035	1,874	19,089	20,141	10,513	
SCHMAP	SG	-	-	-	-	-	-	-	-	
BOOKDEPR	SCHMDEXP	29,198	19,542	3,941	5,433	77	27	179	-	
		833,543	630,341	28,834	122,468	1,951	19,116	20,320	10,513	
SCHMAT	Additions - Temporary	-	-	-	-	-	-	-	-	
SCHMAT-SITUS	S	7,750,166	7,793,171	(35,804)	(15,493)	349	3,552	2,436	1,956	
SCHMAT-SG	GPS	-	-	-	-	-	-	-	-	
D_SPLIT	CIAC	22,664,151	-	-	21,474,876	261,569	-	927,706	-	
SCHMAT-SNP	SNP	18,202,300	8,417,583	4,870,645	4,756,878	-	394	156,531	268	
P	TROID	0	0	-	-	-	-	-	-	
C BILLING	BADDEBT	0	-	-	-	-	0	-	-	
SCHMAT-SE	SE	4,218,144	4,213,232	632	2,970	48	484	511	267	
SCHMAT-SG	GPS	-	-	-	-	-	-	-	-	
CSS_SYS	CN	(13,111)	-	-	-	-	(6,699)	(3,526)	(4,886)	
SCHMAT-SO	SO	4,947,456	2,007,849	360,384	1,783,235	28,925	294,652	310,131	162,281	
SCHMAT-SNP	SNPD	(0)	(0)	(0)	(0)	-	(0)	(0)	(0)	
P	SGCT	-	-	-	-	-	-	-	-	
P	SG	-	-	-	-	-	-	-	-	
BOOKDEPR	SCHMDEXP	264,755,010	177,194,267	35,736,416	49,260,539	697,481	247,263	1,619,044	-	
P	SG	-	-	-	-	-	-	-	-	
P	SG	1,695,981	1,695,981	-	-	-	-	-	-	
P	SG	-	-	-	-	-	-	-	-	
P	SG	-	-	-	-	-	-	-	-	
		324,218,097	201,322,084	40,932,272	77,263,004	988,371	539,646	3,012,833	159,887	
<b>TOTAL SCHEDULE - M ADDITIONS</b>		<b>325,051,640</b>	<b>201,952,425</b>	<b>40,961,106</b>	<b>77,385,472</b>	<b>990,322</b>	<b>558,762</b>	<b>3,033,153</b>	<b>170,400</b>	
SCHMDF	Deductions - Flow Through	-	-	-	-	-	-	-	-	
SCHMDF	S	-	-	-	-	-	-	-	-	
SCHMDF	SG	-	-	-	-	-	-	-	-	
SCHMDF	SG	-	-	-	-	-	-	-	-	
SCHMDP	Deductions - Permanent	-	-	-	-	-	-	-	-	
SCHMDP	S	-	-	-	-	-	-	-	-	
P	SE	274,461	274,461	-	-	-	-	-	-	
SCHMDP	SNP	27,576	27,326	124	122	-	-	4	-	
BOOKDEPR	SCHMDEXP	-	-	-	-	-	-	-	-	
P	SG	-	-	-	-	-	-	-	-	
SCHMDP-SO	SO	-	-	-	-	-	-	-	-	
		302,037	301,787	124	122	-	-	4	-	
SCHMDT	Deductions - Temporary	-	-	-	-	-	-	-	-	
SCHMDT-SITUS	S	1,505,223	1,646,348	(36,285)	(89,520)	(511)	(5,435)	(6,351)	(3,024)	
SCHMDT	BADDEBT	-	-	-	-	-	-	-	-	
SCHMDT-SNP	SNP	30,144,467	13,942,882	8,065,672	7,877,019	-	-	258,894	-	
SCHMDT	CN	-	-	-	-	-	-	-	-	
SCHMDT-SG	SG	539,881	539,771	110	-	-	-	-	-	
SCHMDT-SG	SG	35,996,713	35,989,397	7,316	-	-	-	-	-	
P	SE	38,132	38,132	-	-	-	-	-	-	
SCHMDT-SG	SG	-	-	-	-	-	-	-	-	
SCHMDT-GPS	GPS	13,282,069	6,143,426	3,533,847	3,470,724	-	-	114,072	-	
SCHMDT-SO	SO	7,303,110	2,587,021	(1,643,914)	3,183,522	118,972	1,210,010	1,181,326	666,173	
TAXDEPR	TAXDEPR	362,506,031	225,507,148	68,340,946	63,397,020	72,450	2,105,225	1,707,806	1,375,437	
SCHMDT-SNP	SNPD	-	-	-	-	-	-	-	-	
		451,315,627	286,394,127	78,287,692	77,838,765	190,911	3,309,800	3,255,747	2,038,586	
<b>TOTAL SCHEDULE - M DEDUCTIONS</b>		<b>451,617,664</b>	<b>286,695,913</b>	<b>78,287,816</b>	<b>77,838,886</b>	<b>190,911</b>	<b>3,309,800</b>	<b>3,255,751</b>	<b>2,038,586</b>	
<b>TOTAL SCHEDULE - M ADJUSTMENTS</b>		<b>(126,566,024)</b>	<b>(84,743,489)</b>	<b>(37,326,710)</b>	<b>(453,414)</b>	<b>799,411</b>	<b>(2,751,038)</b>	<b>(222,598)</b>	<b>(1,868,186)</b>	
40911	State Income Taxes	-	-	-	-	-	-	-	-	
REVREQ	S	(3,667,703)	(2,196,072)	(477,573)	(876,862)	(7,052)	(39,619)	(45,891)	(24,634)	
REVREQ	SG	244,599	146,456	31,849	58,478	470	2,642	3,061	1,643	
P	SG	-	-	-	-	-	-	-	-	
IBT	IBT	-	-	-	-	-	-	-	-	
		(3,423,104)	(2,049,616)	(445,724)	(818,385)	(6,581)	(36,977)	(42,831)	(22,991)	
<b>TOTAL STATE TAXES</b>		<b>(3,423,104)</b>	<b>(2,049,616)</b>	<b>(445,724)</b>	<b>(818,385)</b>	<b>(6,581)</b>	<b>(36,977)</b>	<b>(42,831)</b>	<b>(22,991)</b>	
<b>Calculation of Taxable Income:</b>										
Operating Revenues		1,429,069,113	855,068,803	186,079,575	341,637,198	2,747,560	15,436,862	17,880,974	9,598,140	
Operating Deductions:										
O & M Expenses		898,978,769	651,257,582	66,531,242	152,797,604	1,103,353	11,783,346	8,224,732	7,280,910	
Depreciation Expense		287,295,417	183,918,491	40,115,616	58,594,390	829,649	549,794	2,987,603	299,875	
Amortization Expense		34,357,204	5,783,078	1,656,969	20,795,624	45,888	2,362,345	2,073,856	1,639,443	
Taxes Other Than Income		89,848,715	24,393,405	12,572,050	51,281,093	196,584	321,497	874,616	209,471	
Interest & Dividends (AFUDC-Equity)		(21,314,425)	(9,070,742)	(5,114,485)	(6,500,698)	(80,145)	(119,462)	(350,571)	(78,323)	
Misc Revenue & Expense		4,502	(506,624)	(207)	511,333	-	-	-	-	
Total Operating Deductions		1,289,170,182	855,775,190	115,761,186	277,479,347	2,095,329	14,897,519	13,810,237	9,351,376	
Other Deductions:										
Interest Deductions		94,119,313	36,350,292	28,352,350	26,954,774	293,847	257,939	1,754,424	155,685	
Interest on PCRBS		-	-	-	-	1	-	-	-	
Schedule M Adjustments		(126,566,024)	(84,743,489)	(37,326,710)	(453,414)	799,411	(2,751,038)	(222,598)	(1,868,186)	
<b>Income Before State Taxes</b>		<b>(80,786,407)</b>	<b>(121,200,168)</b>	<b>4,639,329</b>	<b>36,769,662</b>	<b>1,157,794</b>	<b>(2,469,633)</b>	<b>2,093,715</b>	<b>(1,777,107)</b>	

State Income Taxes			(3,423,104)	(2,049,616)	(445,724)	(818,385)	(6,581)	-	(36,977)	(42,831)	(22,991)	-
<b>Total Taxable Income</b>			<b>(77,363,305)</b>	<b>(119,150,552)</b>	<b>5,085,052</b>	<b>37,588,047</b>	<b>1,164,375</b>	<b>-</b>	<b>(2,432,657)</b>	<b>2,136,546</b>	<b>(1,754,117)</b>	<b>-</b>
Tax Rate			21%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
Federal Income Tax - Calculated			(16,246,293.66)	(25,021,616)	1,067,861	7,893,490	244,519	-	(510,858)	448,675	(368,365)	-
Adjustments to Calculated Tax:												
40910 PMI	P	SE	(4,236)	(4,236)	-	-	-	-	-	-	-	-
40910 Renewable Energy Cra	P	SG	(32,793,015)	(32,793,015)	-	-	-	-	-	-	-	-
40910	P	SO	-	-	-	-	-	-	-	-	-	-
40910	P	S	-	-	-	-	-	-	-	-	-	-
Federal Income Tax			<b>(69,043,545)</b>	<b>(77,818,866)</b>	<b>1,067,861</b>	<b>7,893,490</b>	<b>244,519</b>	<b>-</b>	<b>(510,858)</b>	<b>448,675</b>	<b>(368,365)</b>	<b>-</b>
<b>TOTAL OPERATING EXPENSES</b>			<b>1,252,605,813</b>	<b>796,150,337</b>	<b>130,121,097</b>	<b>285,744,360</b>	<b>2,151,760</b>	<b>-</b>	<b>14,885,824</b>	<b>14,206,081</b>	<b>9,346,353</b>	<b>-</b>
310 Land and Land Rights												
	P	SG	605,070	605,070	-	-	-	-	-	-	-	-
	P	SG	8,798,338	8,798,338	-	-	-	-	-	-	-	-
	P	SG	14,090,065	14,090,065	-	-	-	-	-	-	-	-
	P	S	-	-	-	-	-	-	-	-	-	-
	P	SG	329,404	329,404	-	-	-	-	-	-	-	-
			<b>23,822,876</b>	<b>23,822,876</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
311 Structures and Improvements												
	P	SG	38,842,516	38,842,516	-	-	-	-	-	-	-	-
	P	SG	81,432,226	81,432,226	-	-	-	-	-	-	-	-
	P	SG	119,173,764	119,173,764	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>259,448,507</b>	<b>259,448,507</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
312 Boiler Plant Equipment												
	P	SG	152,558,236	152,558,236	-	-	-	-	-	-	-	-
	P	SG	120,899,679	120,899,679	-	-	-	-	-	-	-	-
	P	SG	870,295,889	870,295,889	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>1,143,753,805</b>	<b>1,143,753,805</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
314 Turbogenerator Units												
	P	SG	28,349,076	28,349,076	-	-	-	-	-	-	-	-
	P	SG	28,381,769	28,381,769	-	-	-	-	-	-	-	-
	P	SG	189,134,437	189,134,437	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>245,865,282</b>	<b>245,865,282</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
315 Accessory Electric Equipment												
	P	SG	22,300,096	22,300,096	-	-	-	-	-	-	-	-
	P	SG	34,614,595	34,614,595	-	-	-	-	-	-	-	-
	P	SG	33,227,505	33,227,505	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>110,142,196</b>	<b>110,142,196</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
316 Misc Power Plant Equipment												
	P	SG	610,611	610,611	-	-	-	-	-	-	-	-
	P	SG	1,277,420	1,277,420	-	-	-	-	-	-	-	-
	P	SG	6,172,142	6,172,142	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>8,060,173</b>	<b>8,060,173</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
317 Steam Plant ARO												
	P	S	-	-	-	-	-	-	-	-	-	-
			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
SP Unclassified Steam Plant - Account 300												
	P	SG	14,879,541	14,879,541	-	-	-	-	-	-	-	-
			<b>14,879,541</b>	<b>14,879,541</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Steam Production Plant</b>			<b>1,805,972,380</b>	<b>1,805,972,380</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
320 Land and Land Rights												
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
321 Structures and Improvements												
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
322 Reactor Plant Equipment												
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
323 Turbogenerator Units												
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
324 Land and Land Rights												
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
325 Misc. Power Plant Equipment												
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
NP Unclassified Nuclear Plant - Acct 300												
	P	SG	-	-	-	-	-	-	-	-	-	-
			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Nuclear Production Plant</b>			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
330 Land and Land Rights												
	P	SG	2,686,599	2,686,599	-	-	-	-	-	-	-	-
	P	SG	1,369,856	1,369,856	-	-	-	-	-	-	-	-
	P	SG	5,711,291	5,711,291	-	-	-	-	-	-	-	-
	P	SG	342,379	342,379	-	-	-	-	-	-	-	-

				10,110,125	10,110,125	-	-	-	-	-	-	-	-
331	Structures and Improvements	P	SG	5,046,789	5,046,789	-	-	-	-	-	-	-	-
		P	SG	1,260,289	1,260,289	-	-	-	-	-	-	-	-
		P	SG	64,946,487	64,946,487	-	-	-	-	-	-	-	-
		P	SG	3,727,230	3,727,230	-	-	-	-	-	-	-	-
				74,980,795	74,980,795	-	-	-	-	-	-	-	-
332	Reservoirs, Dams & Waterways	P	SG	37,749,982	37,749,982	-	-	-	-	-	-	-	-
		P	SG	4,882,041	4,882,041	-	-	-	-	-	-	-	-
		P	SG	92,916,464	92,916,464	-	-	-	-	-	-	-	-
		P	SG	28,583,316	28,583,316	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
				164,131,802	164,131,802	-	-	-	-	-	-	-	-
333	Water Wheel, Turbines, & Generators	P	SG	7,467,178	7,467,178	-	-	-	-	-	-	-	-
		P	SG	1,755,057	1,755,057	-	-	-	-	-	-	-	-
		P	SG	17,474,476	17,474,476	-	-	-	-	-	-	-	-
		P	SG	11,327,937	11,327,937	-	-	-	-	-	-	-	-
				38,024,649	38,024,649	-	-	-	-	-	-	-	-
334	Accessory Electric Equipment	P	SG	949,900	949,900	-	-	-	-	-	-	-	-
		P	SG	867,394	867,394	-	-	-	-	-	-	-	-
		P	SG	17,641,074	17,641,074	-	-	-	-	-	-	-	-
		P	SG	2,911,566	2,911,566	-	-	-	-	-	-	-	-
				22,369,934	22,369,934	-	-	-	-	-	-	-	-
335	Misc. Power Plant Equipment	P	SG	293,741	293,741	-	-	-	-	-	-	-	-
		P	SG	40,040	40,040	-	-	-	-	-	-	-	-
		P	SG	328,126	328,126	-	-	-	-	-	-	-	-
		P	SG	4,753	4,753	-	-	-	-	-	-	-	-
				666,660	666,660	-	-	-	-	-	-	-	-
336	Roads, Railroads & Bridges	P	SG	1,134,574	1,134,574	-	-	-	-	-	-	-	-
		P	SG	190,957	190,957	-	-	-	-	-	-	-	-
		P	SG	4,899,690	4,899,690	-	-	-	-	-	-	-	-
		P	SG	606,733	606,733	-	-	-	-	-	-	-	-
				6,831,954	6,831,954	-	-	-	-	-	-	-	-
337	Hydro Plant ARO	P	S	-	-	-	-	-	-	-	-	-	-
HP	Unclassified Hydro Plant - Acct 300	P	S	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
	<b>Total Hydraulic Plant</b>			<b>317,115,920</b>	<b>317,115,920</b>	-	-	-	-	-	-	-	-
340	Land and Land Rights	P	S	74,986	74,986	-	-	-	-	-	-	-	-
		P	SG	10,146,538	10,146,538	-	-	-	-	-	-	-	-
		P	SG	3,062,680	3,062,680	-	-	-	-	-	-	-	-
		P	SG	61,138	61,138	-	-	-	-	-	-	-	-
				13,345,342	13,345,342	-	-	-	-	-	-	-	-
341	Structures and Improvements	P	SG	43,366,178	43,366,178	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	24,869,351	24,869,351	-	-	-	-	-	-	-	-
		P	SG	1,111,055	1,111,055	-	-	-	-	-	-	-	-
				69,346,584	69,346,584	-	-	-	-	-	-	-	-
342	Fuel Holders, Producers & Accessories	P	SG	3,542,273	3,542,273	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	717,476	717,476	-	-	-	-	-	-	-	-
				4,259,749	4,259,749	-	-	-	-	-	-	-	-
343	Prime Movers	P	S	315,315	315,315	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	760,259,853	760,259,853	-	-	-	-	-	-	-	-
		P	SG	243,565,988	243,565,988	-	-	-	-	-	-	-	-
		P	SG	15,061,164	15,061,164	-	-	-	-	-	-	-	-
				1,019,202,321	1,019,202,321	-	-	-	-	-	-	-	-
344	Generators	P	S	-	-	-	-	-	-	-	-	-	-
		P	SG	42,197,084	42,197,084	-	-	-	-	-	-	-	-
		P	SG	103,629,596	103,629,596	-	-	-	-	-	-	-	-
		P	SG	4,623,831	4,623,831	-	-	-	-	-	-	-	-
				150,450,512	150,450,512	-	-	-	-	-	-	-	-
345	Accessory Electric Plant	P	SG	51,698,025	51,698,025	-	-	-	-	-	-	-	-
		P	SG	61,617,159	61,617,159	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	754,439	754,439	-	-	-	-	-	-	-	-
				114,069,623	114,069,623	-	-	-	-	-	-	-	-
346	Misc. Power Plant Equipment	P	SG	3,109,480	3,109,480	-	-	-	-	-	-	-	-
		P	SG	2,847,374	2,847,374	-	-	-	-	-	-	-	-
				5,956,854	5,956,854	-	-	-	-	-	-	-	-
347	Other Production ARO	P	S	-	-	-	-	-	-	-	-	-	-
OP	Unclassified Other Prod Plant-Acct 300	P	S	-	-	-	-	-	-	-	-	-	-

	P	SG	(143,835)	(143,835)	-	-	-	-	-	-	-
			(143,835)	(143,835)	-	-	-	-	-	-	-
<b>Total Other Production Plant</b>			<b>1,376,487,150</b>	<b>1,376,487,150</b>	-	-	-	-	-	-	-
Experimental Plant											
103 Experimental Plant	P	SG	-	-	-	-	-	-	-	-	-
<b>Total Experimental Plant</b>			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>TOTAL PRODUCTION PLANT</b>			<b>3,499,575,450</b>	<b>3,499,575,450</b>	-	-	-	-	-	-	-
350 Land and Land Rights											
	T	SG	5,456,596	-	5,456,596	-	-	-	-	-	-
	T	SG	12,267,731	-	12,267,731	-	-	-	-	-	-
	T	SG	62,848,536	-	62,848,536	-	-	-	-	-	-
			80,572,862	-	80,572,862	-	-	-	-	-	-
352 Structures and Improvements											
	T	S	-	-	-	-	-	-	-	-	-
	T	SG	1,806,860	-	1,806,860	-	-	-	-	-	-
	T	SG	4,595,289	-	4,595,289	-	-	-	-	-	-
	T	SG	74,929,623	-	74,929,623	-	-	-	-	-	-
			81,331,772	-	81,331,772	-	-	-	-	-	-
353 Station Equipment											
	STEP_UP	SG	27,181,877	1,911,253	25,270,623	-	-	-	-	-	-
	STEP_UP	SG	39,575,511	2,782,693	36,792,818	-	-	-	-	-	-
	STEP_UP	SG	542,119,063	38,118,289	504,000,764	-	-	-	-	-	-
			608,876,451	42,812,246	566,064,205	-	-	-	-	-	-
354 Towers and Fixtures											
	T	SG	33,309,851	-	33,309,851	-	-	-	-	-	-
	T	SG	34,119,847	-	34,119,847	-	-	-	-	-	-
	T	SG	279,288,483	-	279,288,483	-	-	-	-	-	-
			346,718,181	-	346,718,181	-	-	-	-	-	-
355 Poles and Fixtures											
	T	S	-	-	-	-	-	-	-	-	-
	T	SG	15,567,606	-	15,567,606	-	-	-	-	-	-
	T	SG	29,543,613	-	29,543,613	-	-	-	-	-	-
	T	SG	322,960,871	-	322,960,871	-	-	-	-	-	-
			368,072,090	-	368,072,090	-	-	-	-	-	-
356 Clearing and Grading											
	T	SG	40,947,977	-	40,947,977	-	-	-	-	-	-
	T	SG	40,862,920	-	40,862,920	-	-	-	-	-	-
	T	SG	276,773,819	-	276,773,819	-	-	-	-	-	-
			358,584,716	-	358,584,716	-	-	-	-	-	-
357 Underground Conduit											
	T	SG	1,657	-	1,657	-	-	-	-	-	-
	T	SG	23,831	-	23,831	-	-	-	-	-	-
	T	SG	977,652	-	977,652	-	-	-	-	-	-
			1,003,139	-	1,003,139	-	-	-	-	-	-
358 Underground Conductors											
	T	SG	-	-	-	-	-	-	-	-	-
	T	SG	282,783	-	282,783	-	-	-	-	-	-
	T	SG	2,078,338	-	2,078,338	-	-	-	-	-	-
			2,361,120	-	2,361,120	-	-	-	-	-	-
359 Roads and Trails											
	T	SG	484,421	-	484,421	-	-	-	-	-	-
	T	SG	114,541	-	114,541	-	-	-	-	-	-
	T	SG	2,559,215	-	2,559,215	-	-	-	-	-	-
			3,158,177	-	3,158,177	-	-	-	-	-	-
TP Unclassified Trans Plant - Acct 300											
	T	SG	240,402,438	-	240,402,438	-	-	-	-	-	-
			240,402,438	-	240,402,438	-	-	-	-	-	-
TS0 Unclassified Trans Sub Plant - Acct 300											
	T	SG	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
<b>TOTAL TRANSMISSION PLANT</b>			<b>2,091,080,946</b>	<b>42,812,246</b>	<b>2,048,268,700</b>	-	-	-	-	-	-
360 Land and Land Rights											
	D	S	15,341,593	-	15,341,593	-	-	-	-	-	-
			15,341,593	-	15,341,593	-	-	-	-	-	-
361 Structures and Improvements											
	D	S	34,602,903	-	34,602,903	-	-	-	-	-	-
			34,602,903	-	34,602,903	-	-	-	-	-	-
362 Station Equipment											
	D	S	278,426,317	-	278,426,317	-	-	-	-	-	-
			278,426,317	-	278,426,317	-	-	-	-	-	-
363 Storage Battery Equipment											
	D	S	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
364 Poles, Towers & Fixtures											
	D	S	473,552,029	-	473,552,029	-	-	-	-	-	-
			473,552,029	-	473,552,029	-	-	-	-	-	-
365 Overhead Conductors											
	D	S	313,370,002	-	313,370,002	-	-	-	-	-	-
			313,370,002	-	313,370,002	-	-	-	-	-	-
366 Underground Conduit											
	D	S	113,316,773	-	113,316,773	-	-	-	-	-	-
			113,316,773	-	113,316,773	-	-	-	-	-	-
367 Underground Conductors											
	D	S	223,703,231	-	223,703,231	-	-	-	-	-	-
			223,703,231	-	223,703,231	-	-	-	-	-	-
368 Line Transformers											
	D	S	521,925,966	-	521,925,966	-	-	-	-	-	-
			521,925,966	-	521,925,966	-	-	-	-	-	-



369	Services	D	S	340,242,418	-	-	340,242,418	-	-	-	-	-	-
				340,242,418	-	-	340,242,418	-	-	-	-	-	-
370	Meters	C_Meter	S	101,685,442	-	-	-	-	-	-	101,685,442	-	-
				101,685,442	-	-	-	-	-	-	101,685,442	-	-
371	Installations on Customers' Premises	DL	S	2,803,506	-	-	-	2,803,506	-	-	-	-	-
				2,803,506	-	-	-	2,803,506	-	-	-	-	-
372	Leased Property	D	S	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
373	Street Lights	DL	S	25,866,963	-	-	-	25,866,963	-	-	-	-	-
				25,866,963	-	-	-	25,866,963	-	-	-	-	-
DP	Unclassified Dist Plant - Acct 300	D	S	39,370,985	-	-	39,370,985	-	-	-	-	-	-
				39,370,985	-	-	39,370,985	-	-	-	-	-	-
D50	Unclassified Dist Sub Plant - Acct 300	D	S	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
<b>TOTAL DISTRIBUTION PLANT</b>				<b>2,484,208,127</b>	<b>-</b>	<b>-</b>	<b>2,353,852,216</b>	<b>28,670,469</b>	<b>-</b>	<b>-</b>	<b>101,685,442</b>	<b>-</b>	<b>-</b>
389	Land and Land Rights	D_SPLIT	S	6,116,556	-	-	5,795,597	70,592	-	-	250,367	-	-
		B_Center	CN	949,723	-	-	-	-	-	227,826	-	121,897	-
		G-DGU	SG	86	55	32	-	-	-	-	-	-	-
		G-SG	SG	319	131	188	-	-	-	-	-	-	-
		LABOR	SO	2,064,667	839,986	157,513	740,554	11,857	-	120,787	127,446	66,524	-
				8,531,352	940,172	157,732	6,536,151	82,449	-	348,612	377,813	188,421	-
390	Structures and Improvements	D_SPLIT	S	40,901,786	-	-	38,755,513	472,051	-	-	1,674,222	-	-
		P	SE	221,299	221,299	-	-	-	-	-	-	-	-
		G-DGP	SG	87,168	55,222	31,945	-	-	-	-	-	-	-
		G-DGU	SG	352,685	223,432	129,252	-	-	-	-	-	-	-
		B_Center	CN	2,543,565	-	-	-	-	-	1,656,995	-	886,570	-
		G-SG	SG	2,702,211	1,111,958	1,590,253	-	-	-	-	-	-	-
		LABOR	SO	27,502,687	11,189,149	2,098,171	9,864,656	157,948	-	1,608,956	1,697,663	886,145	-
				74,311,401	12,801,061	3,849,622	48,620,169	629,999	-	3,265,951	3,371,885	1,772,713	-
391	Office Furniture & Equipment	D_SPLIT	S	2,404,388	-	-	2,278,221	27,749	-	-	98,418	-	-
		G-DGP	SG	-	-	-	-	-	-	-	-	-	-
		G-DGU	SG	-	-	-	-	-	-	-	-	-	-
		B_Center	CN	1,248,381	-	-	-	-	-	813,253	-	435,128	-
		G-SG	SG	1,069,938	440,278	629,659	-	-	-	-	-	-	-
		P	SE	7,963	7,963	-	-	-	-	-	-	-	-
		LABOR	SO	16,483,298	6,706,039	1,257,505	5,912,225	94,663	-	964,302	1,017,468	531,096	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	1,050	1,050	-	-	-	-	-	-	-	-
				21,215,018	7,155,330	1,887,165	8,190,446	122,413	-	1,777,555	1,115,886	966,224	-
392	Transportation Equipment	D_SPLIT	S	25,963,884	-	-	24,601,459	299,652	-	-	1,062,773	-	-
		LABOR	SO	2,106,247	856,902	160,685	755,468	12,096	-	123,219	130,013	67,864	-
		G-SG	SG	6,118,237	2,517,649	3,600,587	-	-	-	-	-	-	-
		B_Center	CN	-	-	-	-	-	-	-	-	-	-
		G-DGU	SG	104,317	66,087	38,230	-	-	-	-	-	-	-
		P	SE	81,579	81,579	-	-	-	-	-	-	-	-
		G-DGP	SG	18,361	11,632	6,729	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	11,611	11,611	-	-	-	-	-	-	-	-
				34,404,234	3,545,460	3,806,231	25,356,927	311,748	-	123,219	1,192,786	67,864	-
393	Stores Equipment	D_SPLIT	S	2,735,814	-	-	2,592,255	31,574	-	-	111,984	-	-
		G-DGP	SG	-	-	-	-	-	-	-	-	-	-
		G-DGU	SG	-	-	-	-	-	-	-	-	-	-
		LABOR	SO	67,429	27,433	5,144	24,185	387	-	3,945	4,162	2,173	-
		G-SG	SG	1,562,269	642,872	919,396	-	-	-	-	-	-	-
		P	SG	14,033	14,033	-	-	-	-	-	-	-	-
				4,379,545	684,338	924,541	2,616,440	31,962	-	3,945	116,147	2,173	-
394	Tools, Shop & Garage Equipment	D_SPLIT	S	10,914,668	-	-	10,341,934	125,967	-	-	446,767	-	-
		G-DGP	SG	9,799	6,208	3,591	-	-	-	-	-	-	-
		G-SG	SG	5,639,637	2,320,706	3,318,931	-	-	-	-	-	-	-
		LABOR	SO	531,591	216,272	40,555	190,671	3,053	-	31,099	32,814	17,128	-
		P	SE	31,322	31,322	-	-	-	-	-	-	-	-
		G-SG	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	23,379	23,379	-	-	-	-	-	-	-	-
				17,150,396	2,597,887	3,363,077	10,532,605	129,020	-	31,099	479,581	17,128	-
395	Laboratory Equipment	D_SPLIT	S	9,565,368	-	-	9,063,437	110,395	-	-	391,537	-	-
		G-DGP	SG	-	-	-	-	-	-	-	-	-	-
		G-DGU	SG	-	-	-	-	-	-	-	-	-	-
		LABOR	SO	1,521,794	537,756	100,839	474,101	7,591	-	77,327	81,591	42,588	-
		P	SE	334,735	334,735	-	-	-	-	-	-	-	-
		G-SG	SG	1,676,500	689,879	986,622	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	3,646	3,646	-	-	-	-	-	-	-	-
				12,902,043	1,566,016	1,087,461	9,537,537	117,986	-	77,327	473,127	42,588	-
396	Power Operated Equipment	D_SPLIT	S	44,851,927	-	-	42,498,374	517,640	-	-	1,835,912	-	-
		G-DGP	SG	68,125	43,158	24,966	-	-	-	-	-	-	-
		G-SG	SG	11,742,978	4,832,226	6,910,752	-	-	-	-	-	-	-
		LABOR	SO	2,261,093	919,900	172,498	811,008	12,985	-	132,278	139,571	72,853	-
		G-DGU	SG	240,471	152,343	88,128	-	-	-	-	-	-	-
		P	SE	58,982	58,982	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
				59,223,576	6,006,609	7,196,345	43,309,383	530,626	-	132,278	1,975,483	72,853	-
397	Communication Equipment												

		D_SPLIT	S	99,466,592	-	-	94,247,199	1,147,953	-	-	4,071,440	-	-
		G-DGP	SG	78,467	49,711	28,757	-	-	-	-	-	-	-
		G-DGU	SG	36,210	22,940	13,270	-	-	-	-	-	-	-
		LABOR	SO	40,663,806	16,543,598	3,102,229	14,585,283	233,532	-	2,378,905	2,510,062	1,310,197	-
		B_Center	CN	638,025	-	-	-	-	-	415,639	-	222,386	-
		G-SG	SG	49,577,591	20,401,139	29,176,453	-	-	-	-	-	-	-
		P	SE	23,330	23,330	-	-	-	-	-	-	-	-
		G-SG	SG	-	-	-	-	-	-	-	-	-	-
		G-SG	SG	4,325	1,780	2,545	-	-	-	-	-	-	-
				<b>190,488,346</b>	<b>37,042,497</b>	<b>32,323,253</b>	<b>108,832,481</b>	<b>1,381,485</b>	<b>-</b>	<b>2,794,544</b>	<b>6,581,502</b>	<b>1,532,583</b>	<b>-</b>
398	Misc. Equipment	D_SPLIT	S	1,225,125	-	-	1,160,838	14,139	-	-	50,148	-	-
		G-DGP	SG	-	-	-	-	-	-	-	-	-	-
		G-DGU	SG	-	-	-	-	-	-	-	-	-	-
		B_Center	CN	25,566	-	-	-	-	-	16,653	-	8,911	-
		LABOR	SO	604,569	245,962	46,122	216,847	3,472	-	35,368	37,318	19,479	-
		P	SE	988	988	-	-	-	-	-	-	-	-
		G-SG	SG	746,796	307,306	439,490	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
				<b>2,603,044</b>	<b>554,256</b>	<b>485,613</b>	<b>1,377,684</b>	<b>17,611</b>	<b>-</b>	<b>52,023</b>	<b>87,466</b>	<b>28,390</b>	<b>-</b>
399	Coal Mine	P	SE	12,644,903	12,644,903	-	-	-	-	-	-	-	-
MP	Unclassified Mine Plant	P	SE	-	-	-	-	-	-	-	-	-	-
				<b>12,644,903</b>	<b>12,644,903</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
399L	WIDCO Capital Lease	P	SE	-	-	-	-	-	-	-	-	-	-
	Remove Capital Leases			-	-	-	-	-	-	-	-	-	-
1011390	General Capital Leases	D_SPLIT	S	1,612,664	-	-	1,528,041	18,612	-	-	66,011	-	-
		P	SG	2,569,194	2,569,194	-	-	-	-	-	-	-	-
		LABOR	SO	-	-	-	-	-	-	-	-	-	-
				<b>4,181,858</b>	<b>2,569,194</b>	<b>-</b>	<b>1,528,041</b>	<b>18,612</b>	<b>-</b>	<b>-</b>	<b>66,011</b>	<b>-</b>	<b>-</b>
	Remove Capital Leases			<b>(4,181,858)</b>	<b>(2,569,194)</b>	<b>-</b>	<b>(1,528,041)</b>	<b>(18,612)</b>	<b>-</b>	<b>-</b>	<b>(66,011)</b>	<b>-</b>	<b>-</b>
1011346	General Gas Line Capital Leases	P	SG	-	-	-	-	-	-	-	-	-	-
	Remove Capital Leases			-	-	-	-	-	-	-	-	-	-
GP	Unclassified Gen Plant - Acct 300	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
		LABOR	SO	16,717,753	6,801,424	1,275,392	5,996,319	96,010	-	978,018	1,031,940	538,650	-
		B_Center	CN	-	-	-	-	-	-	-	-	-	-
		G-SG	SG	-	-	-	-	-	-	-	-	-	-
		G-DGP	SG	-	-	-	-	-	-	-	-	-	-
		G-DGU	SG	-	-	-	-	-	-	-	-	-	-
				<b>16,717,753</b>	<b>6,801,424</b>	<b>1,275,392</b>	<b>5,996,319</b>	<b>96,010</b>	<b>-</b>	<b>978,018</b>	<b>1,031,940</b>	<b>538,650</b>	<b>-</b>
399G	Unclassified Gen Plant - Acct 300	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
		LABOR	SO	-	-	-	-	-	-	-	-	-	-
		G-SG	SG	-	-	-	-	-	-	-	-	-	-
		G-DGP	SG	-	-	-	-	-	-	-	-	-	-
		G-DGU	SG	-	-	-	-	-	-	-	-	-	-
				<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
	<b>TOTAL GENERAL PLANT</b>			<b>454,571,611</b>	<b>92,239,954</b>	<b>56,356,431</b>	<b>270,906,142</b>	<b>3,451,308</b>	<b>-</b>	<b>9,584,572</b>	<b>16,803,616</b>	<b>5,229,587</b>	<b>-</b>
301	Organization	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
		LABOR	SO	-	-	-	-	-	-	-	-	-	-
		I-SG	SG	-	-	-	-	-	-	-	-	-	-
302	Franchise & Consent	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
		I-SG	SG	3,127,269	2,053,574	1,071,134	2,479	-	-	-	81	-	-
		I-DGP	SG	46,148,665	46,148,665	-	-	-	-	-	-	-	-
		I-DGU	SG	2,534,217	2,534,217	-	-	-	-	-	-	-	-
		I-DGP	SG	-	-	-	-	-	-	-	-	-	-
		I-DGU	SG	124,183	124,183	-	-	-	-	-	-	-	-
				<b>51,934,335</b>	<b>50,860,640</b>	<b>1,071,134</b>	<b>2,479</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>81</b>	<b>-</b>	<b>-</b>
303	Miscellaneous Intangible Plant	D_SPLIT	S	4,609,463	-	-	4,367,587	53,198	-	-	188,678	-	-
		LABOR	SG	51,359,564	20,895,044	3,918,205	18,421,634	294,958	-	3,004,626	3,170,281	1,654,817	-
		LABOR	SO	129,329,917	52,616,379	9,866,538	46,388,019	742,741	-	7,566,030	7,983,171	4,167,039	-
		P	SE	(16,029)	(16,029)	-	-	-	-	-	-	-	-
		CSS_SYS	CN	66,204,805	-	-	-	-	-	29,350,796	15,447,787	21,406,220	-
		I-DGP	SG	-	-	-	-	-	-	-	-	-	-
		I-DGP	SG	-	-	-	-	-	-	-	-	-	-
				<b>251,487,718</b>	<b>73,495,393</b>	<b>13,784,742</b>	<b>69,177,240</b>	<b>1,090,897</b>	<b>-</b>	<b>39,921,453</b>	<b>26,789,918</b>	<b>27,228,075</b>	<b>-</b>
303	Less Non-Utility Plant	I-SITUS	S	-	-	-	-	-	-	-	-	-	-
				<b>251,487,718</b>	<b>73,495,393</b>	<b>13,784,742</b>	<b>69,177,240</b>	<b>1,090,897</b>	<b>-</b>	<b>39,921,453</b>	<b>26,789,918</b>	<b>27,228,075</b>	<b>-</b>
IP	Unclassified Intangible Plant - Acct 300	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
		I-SG	SG	-	-	-	-	-	-	-	-	-	-
		I-DGU	SG	-	-	-	-	-	-	-	-	-	-
		LABOR	SO	-	-	-	-	-	-	-	-	-	-
				<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
	<b>TOTAL INTANGIBLE PLANT</b>			<b>303,422,053</b>	<b>124,356,033</b>	<b>14,855,877</b>	<b>69,179,719</b>	<b>1,090,897</b>	<b>-</b>	<b>39,921,453</b>	<b>26,790,000</b>	<b>27,228,075</b>	<b>-</b>
	<b>TOTAL ELECTRIC PLANT IN SERVICE</b>			<b>8,832,858,186</b>	<b>3,758,983,683</b>	<b>2,119,481,008</b>	<b>2,693,938,078</b>	<b>33,212,674</b>	<b>-</b>	<b>49,506,025</b>	<b>145,279,057</b>	<b>32,457,663</b>	<b>-</b>
105	Plant Held For Future Use	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		T	SG	436,807	-	436,807	-	-	-	-	-	-	-
		P	SG	2,320,216	2,320,216	-	-	-	-	-	-	-	-
		P	SE	-	-	-	-	-	-	-	-	-	-
		G	SG	(2,757,023)	(562,423)	(997,862)	(1,123,039)	-	-	(36,787)	(36,911)	-	-

				-	1,757,792	(561,055)	(1,123,039)	-	-	(36,787)	(36,911)	-	-
114	Electric Plant Acquisition Adjustments			-	-	-	-	-	-	-	-	-	-
	P	S		-	-	-	-	-	-	-	-	-	-
	P	SG		914,861	914,861	-	-	-	-	-	-	-	-
	P	SG		-	-	-	-	-	-	-	-	-	-
				914,861	914,861	-	-	-	-	-	-	-	-
115	Accum. Provision for Asset Acquisition Adjustments			-	-	-	-	-	-	-	-	-	-
	P	S		-	-	-	-	-	-	-	-	-	-
	P	SG		(215,102)	(215,102)	-	-	-	-	-	-	-	-
	P	SG		-	-	-	-	-	-	-	-	-	-
				(215,102)	(215,102)	-	-	-	-	-	-	-	-
128	Pensions	LABOR	SO	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
124	Weatherization			-	-	-	-	-	-	-	-	-	-
		DSM	S	-	-	-	-	-	-	-	-	-	-
		DSM	SO	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
182W	Weatherization			-	-	-	-	-	-	-	-	-	-
		DSM	S	-	-	-	-	-	-	-	-	-	-
		DSM	SG	-	-	-	-	-	-	-	-	-	-
		DSM	SG	-	-	-	-	-	-	-	-	-	-
		DSM	SO	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
186W	Weatherization			-	-	-	-	-	-	-	-	-	-
		DSM	S	-	-	-	-	-	-	-	-	-	-
		DSM	CN	-	-	-	-	-	-	-	-	-	-
		DSM	CNP	-	-	-	-	-	-	-	-	-	-
		DSM	SG	-	-	-	-	-	-	-	-	-	-
		DSM	SO	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
	Total Weatherization			-	-	-	-	-	-	-	-	-	-
151	Fuel Stock			-	-	-	-	-	-	-	-	-	-
	P	DEU		-	-	-	-	-	-	-	-	-	-
	P	SE		38,576,326	38,576,326	-	-	-	-	-	-	-	-
	P	SE		-	-	-	-	-	-	-	-	-	-
	P	SE		-	-	-	-	-	-	-	-	-	-
				38,576,326	38,576,326	-	-	-	-	-	-	-	-
152	Fuel Stock - Undistributed	P	SE	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
25316	DG&T Working Capital Deposit	P	SE	(698,512)	(698,512)	-	-	-	-	-	-	-	-
				(698,512)	(698,512)	-	-	-	-	-	-	-	-
25317	DG&T Working Capital Deposit	P	SE	(658,229)	(658,229)	-	-	-	-	-	-	-	-
				(658,229)	(658,229)	-	-	-	-	-	-	-	-
25319	Provo Working Capital Deposit	P	SE	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
	Total Fuel Stock			37,219,586	37,219,586	-	-	-	-	-	-	-	-
154	Materials and Supplies			49,096,450	40,104,956	726,333	8,002,154	-	-	263,007	-	-	-
	MSS	SG		(131,198)	(107,170)	(1,941)	(21,384)	-	-	(703)	-	-	-
	MSS	SE		-	-	-	-	-	-	-	-	-	-
	MSS	SO		(348,355)	(284,558)	(5,154)	(56,778)	-	-	(1,866)	-	-	-
	MSS	SG		31,239,258	25,518,119	462,154	5,091,638	-	-	167,347	-	-	-
	MSS	SG		2,068	1,689	31	337	-	-	11	-	-	-
	MSS	SNPD		(346,469)	(283,017)	(5,126)	(56,470)	-	-	(1,856)	-	-	-
	MSS	SG		-	-	-	-	-	-	-	-	-	-
	MSS	SG		-	-	-	-	-	-	-	-	-	-
	MSS	SG		-	-	-	-	-	-	-	-	-	-
	MSS	SG		-	-	-	-	-	-	-	-	-	-
	MSS	SG		2,192,006	1,790,564	32,429	357,272	-	-	11,742	-	-	-
	MSS	SG		-	-	-	-	-	-	-	-	-	-
				81,703,762	66,740,584	1,208,726	13,316,769	-	-	437,682	-	-	-
163	Stores Expense Undistributed	MSS	SO	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
25318	Provo Working Capital Deposit	MSS	SG	(70,985)	(57,985)	(1,050)	(11,570)	-	-	(380)	-	-	-
				(70,985)	(57,985)	(1,050)	(11,570)	-	-	(380)	-	-	-
	Total Materials & Supplies			81,632,777	66,682,599	1,207,676	13,305,200	-	-	437,302	-	-	-
165	Prepayments			4,077,479	1,658,875	311,070	1,462,509	23,417	-	238,540	251,691	131,377	-
	GP	SG		43,444	18,488	10,425	13,250	163	-	243	715	160	-
	PT	SG		996,982	624,080	372,903	-	-	-	-	-	-	-
	P	SE		11,397	11,397	-	-	-	-	-	-	-	-
	LABOR	SO		5,987,273	2,455,853	456,767	2,147,514	34,385	-	350,266	369,578	192,911	-
				11,116,576	4,748,693	1,151,164	3,623,273	57,965	-	589,049	621,983	324,448	-
182M	Misc Regulatory Assets			-	-	-	-	-	-	-	-	-	-
	DDSG	S		-	-	-	-	-	-	-	-	-	-
	DEFSG	SG		609,632	558,581	51,051	-	-	-	-	-	-	-
	P	SGCT		-	-	-	-	-	-	-	-	-	-
	DEFSG	SG		-	-	-	-	-	-	-	-	-	-
	P	SE		28,687,840	28,687,840	-	-	-	-	-	-	-	-
	P	SG		-	-	-	-	-	-	-	-	-	-
	LABOR	SO		12,424,112	5,054,606	947,832	4,456,277	71,352	-	726,833	766,905	400,308	-
				41,721,584	34,301,027	998,883	4,456,277	71,352	-	726,833	766,905	400,308	-
186M	Misc Deferred Debits			-	-	-	-	-	-	-	-	-	-
	LABOR	S		-	-	-	-	-	-	-	-	-	-
	P	SG		-	-	-	-	-	-	-	-	-	-
	P	SG		-	-	-	-	-	-	-	-	-	-
	DEFSG	SG		25,094,481	22,993,045	2,101,436	-	-	-	-	-	-	-

	LABOR	SO	21,262	8,650	1,622	7,626	122	-	1,244	1,312	685	-
	P	SE	201,674	201,674	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
	GP	EXCTAX	-	-	-	-	-	-	-	-	-	-
			25,317,417	23,203,369	2,103,058	7,626	122	-	1,244	1,312	685	-
Working Capital												
CWC	Cash Working Capital											
	CWC	S	8,765,418	5,698,937	762,611	2,019,784	14,710	-	110,548	90,922	67,905	-
	CWC	SO	-	-	-	-	-	-	-	-	-	-
	CWC	SE	-	-	-	-	-	-	-	-	-	-
			8,765,418	5,698,937	762,611	2,019,784	14,710	-	110,548	90,922	67,905	-
OWC	Other Work. Cap.											
131	Cash	GP	SNP	-	-	-	-	-	-	-	-	-
135	Working Funds	GP	SG	-	-	-	-	-	-	-	-	-
141	Notes Receivable	GP	SO	-	-	-	-	-	-	-	-	-
143	Other A/R	LABOR	SO	10,480,238	4,263,763	799,534	3,759,049	60,188	613,113	646,916	337,676	-
232	A/P	LABOR	S	-	-	-	-	-	-	-	-	-
232	A/P	LABOR	SO	(1,669,775)	(679,328)	(127,387)	(598,914)	(9,590)	(97,685)	(103,070)	(53,801)	-
232	A/P	P	SE	(776,540)	(776,540)	-	-	-	-	-	-	-
232	A/P	P	SG	(866,207)	(866,207)	-	-	-	-	-	-	-
2533	Other Misc. Df Crd.	P	S	-	-	-	-	-	-	-	-	-
2533	Other Misc. Df Crd.	P	SE	(2,318,518)	(2,318,518)	-	-	-	-	-	-	-
230	Asset Restr. Oblig.	P	SE	-	-	-	-	-	-	-	-	-
230	Asset Restr. Oblig.	P	S	-	-	-	-	-	-	-	-	-
254	Decom. Reg Liability	P	SG	-	-	-	-	-	-	-	-	-
254	Reclam. Reg Liability	P	SE	-	-	-	-	-	-	-	-	-
2533	Cholls Reclamation	P	SE	-	-	-	-	-	-	-	-	-
			4,849,199	(376,829)	672,147	3,160,135	50,598	-	513,428	543,845	283,875	-
Total Working Capital			13,614,617	5,322,108	1,434,758	5,179,919	65,309	-	623,976	634,767	351,781	-
Miscellaneous Rate Base												
18221	Unrec Plant & Reg Study Costs	P	S	-	-	-	-	-	-	-	-	-
18222	Nuclear Plant - Trojan	P	S	-	-	-	-	-	-	-	-	-
		P	TROJP	-	-	-	-	-	-	-	-	-
		P	TROJD	-	-	-	-	-	-	-	-	-
1869	Misc Deferred Debits-Trojan	P	S	(101,493)	(101,493)	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-
				(101,493)	(101,493)	-	-	-	-	-	-	-
TOTAL MISCELLANEOUS RATE BASE			(101,493)	(101,493)	-	-	-	-	-	-	-	-
TOTAL RATE BASE ADDITIONS			211,220,822	173,833,441	6,334,484	25,449,256	194,748	-	1,906,314	2,425,359	1,077,222	-
235	Customer Service Deposits											
	C_BILLING	S	-	-	-	-	-	-	-	-	-	-
	C_BILLING	CN	-	-	-	-	-	-	-	-	-	-
2281	Prov for Property Insuranc	LABOR	S	20,937,606	8,518,223	1,597,323	7,509,895	120,245	1,224,887	1,292,419	674,614	-
2282	Prov for Injuries & Damag	LABOR	SO	-	-	-	-	-	-	-	-	-
2282	Prov for Injuries & Damag	LABOR	S	(12,416,392)	(5,051,465)	(947,243)	(4,453,508)	(71,307)	(726,381)	(766,429)	(400,059)	-
2283	Prov for Pensions and Ben	LABOR	SO	(437,312)	(177,915)	(33,362)	(156,855)	(2,511)	(21,584)	(26,994)	(14,090)	-
2283	Prov for Pensions and Ben	LABOR	S	-	-	-	-	-	-	-	-	-
25333	Pens Oblig	LABOR	SE	(28,687,840)	(11,671,316)	(2,188,586)	(10,289,747)	(164,754)	(1,678,290)	(1,770,820)	(924,329)	-
254	Reg Liabilities - Insurance	LABOR	SO	(3,038,793)	(1,236,295)	(231,829)	(1,089,953)	(17,452)	(177,773)	(187,576)	(97,911)	-
			(23,642,731)	(9,618,771)	(1,803,696)	(8,480,168)	(135,780)	-	(1,383,142)	(1,459,399)	(761,774)	-
22841	Accum Misc Oper Provisions - Other											
	P	S	-	-	-	-	-	-	-	-	-	-
	P	SG	(61,066)	(61,066)	-	-	-	-	-	-	-	-
			(61,066)	(61,066)	-	-	-	-	-	-	-	-
254105	ARO	P	S	-	-	-	-	-	-	-	-	-
230	ARO	P	TROJD	(1,436,487)	(1,436,487)	-	-	-	-	-	-	-
254105	ARO	P	TROJD	-	-	-	-	-	-	-	-	-
254		P	S	(369,192,352)	(369,192,352)	-	-	-	-	-	-	-
			(370,628,839)	(370,628,839)	-	-	-	-	-	-	-	-
252	Customer Advances for Construction											
	D_SPLIT	S	(2,069,907)	-	-	(1,961,291)	(23,889)	-	-	(84,727)	-	-
	T	SE	-	-	-	-	-	-	-	-	-	-
	T	SG	(20,901,487)	-	(20,901,487)	-	-	-	-	-	-	-
	D_SPLIT	SO	-	-	-	-	-	-	-	-	-	-
	B_Center	CN	-	-	-	-	-	-	-	-	-	-
			(22,971,394)	-	(20,901,487)	(1,961,291)	(23,889)	-	-	(84,727)	-	-
25398	SO2 Emissions	P	SE	-	-	-	-	-	-	-	-	-
25399	Other Deferred Credits											
	D_SPLIT	S	(204,430)	-	-	(193,702)	(2,359)	-	-	(8,368)	-	-
	LABOR	SO	-	-	-	-	-	-	-	-	-	-
	P	SG	(16,601,692)	(16,601,692)	-	-	-	-	-	-	-	-
	P	SE	(3,637,870)	(3,637,870)	-	-	-	-	-	-	-	-
			(20,443,991)	(20,239,561)	-	(193,702)	(2,359)	-	-	(8,368)	-	-
190	Accumulated Deferred Income Taxes											
	D_SPLIT	S	93,571,742	-	-	88,661,674	1,079,920	-	-	3,830,148	-	-
	CSS_SYS	CN	-	-	-	-	-	-	-	-	-	-
	LABOR	SO	14,629,196	5,951,719	1,116,057	5,247,196	84,015	-	855,834	903,019	471,356	-
	P	GPS	-	-	-	-	-	-	-	-	-	-
	IBT	P	-	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
	C_BILLING	BADDEBT	2,389,493	-	-	-	-	-	2,389,493	-	-	-
	P	TROJD	332,600	332,600	-	-	-	-	-	-	-	-
	P	SG	357,511	357,511	-	-	-	-	-	-	-	-
	P	SE	470,514	470,514	-	-	-	-	-	-	-	-
	LABOR	SNP	-	-	-	-	-	-	-	-	-	-
	D_SPLIT	SNPD	409,509	-	-	388,021	4,726	-	-	16,762	-	-
	P	SG	-	-	-	-	-	-	-	-	-	-
			112,160,564	7,112,343	1,116,057	94,296,891	1,168,661	-	3,245,327	4,749,929	471,356	-



				(261,797,228)	-	-	(261,797,228)	-	-	-	-	-	-
108365	Overhead Conductors	D	S	(142,507,594)	-	-	(142,507,594)	-	-	-	-	-	-
				(142,507,594)	-	-	(142,507,594)	-	-	-	-	-	-
108366	Underground Conduit	D	S	(30,993,314)	-	-	(30,993,314)	-	-	-	-	-	-
				(30,993,314)	-	-	(30,993,314)	-	-	-	-	-	-
108367	Underground Conductors	D	S	(101,295,777)	-	-	(101,295,777)	-	-	-	-	-	-
				(101,295,777)	-	-	(101,295,777)	-	-	-	-	-	-
108368	Line Transformers	D	S	(260,127,513)	-	-	(260,127,513)	-	-	-	-	-	-
				(260,127,513)	-	-	(260,127,513)	-	-	-	-	-	-
108369	Services	D	S	(150,368,950)	-	-	(150,368,950)	-	-	-	-	-	-
				(150,368,950)	-	-	(150,368,950)	-	-	-	-	-	-
108370	Meters	C_Meter	S	(23,688,784)	-	-	-	-	-	-	(23,688,784)	-	-
				(23,688,784)	-	-	-	-	-	-	(23,688,784)	-	-
108371	Installations on Customers' Premises	DL	S	(2,168,171)	-	-	-	(2,168,171)	-	-	-	-	-
				(2,168,171)	-	-	-	(2,168,171)	-	-	-	-	-
108372	Leased Property	D	S	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
108373	Street Lights	DL	S	(13,088,693)	-	-	-	(13,088,693)	-	-	-	-	-
				(13,088,693)	-	-	-	(13,088,693)	-	-	-	-	-
108D00	Unclassified Dist Plant - Acct 300	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
108DS	Unclassified Dist Sub Plant - Acct 300	D_SPLIT	S	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
108DP	Unclassified Dist Sub Plant - Acct 300	D_SPLIT	S	2,061,813	-	-	1,933,622	23,796	-	-	84,396	-	-
				2,061,813	-	-	1,933,622	23,796	-	-	84,396	-	-
<b>TOTAL DISTRIBUTION PLANT DEPR</b>				<b>(1,122,481,248)</b>			<b>(1,083,643,812)</b>	<b>(15,233,068)</b>			<b>(23,604,388)</b>		
108GP	General Plant Accumulated Depr	D_SPLIT	S	(108,559,029)	-	-	(102,862,521)	(1,252,889)	-	-	(4,443,618)	-	-
		G-DGP	SG	(185,975)	(117,819)	(68,157)	-	-	-	-	-	-	-
		G-DGU	SG	(507,479)	(321,498)	(185,982)	-	-	-	-	-	-	-
		G-SG	SG	(36,134,859)	(14,869,465)	(21,265,394)	-	-	-	-	-	-	-
		B_Center	CN	(2,141,251)	-	-	-	-	(1,394,909)	-	(746,342)	-	-
		LABOR	SO	(34,199,402)	(13,913,631)	(2,609,061)	(12,266,632)	(196,407)	(2,000,726)	(2,111,033)	(1,101,912)	-	-
		P	SE	(372,404)	(372,404)	-	-	-	-	-	-	-	-
		G-SG	SG	(33,908)	(13,953)	(19,955)	-	-	-	-	-	-	-
		G-SG	SG	-	-	-	-	-	-	-	-	-	-
				(182,134,308)	(29,608,770)	(24,148,548)	(115,129,133)	(1,449,296)	-	(3,395,635)	(6,554,651)	(1,848,254)	-
108MP	Mining Plant Accumulated Depr.	P	S	-	-	-	-	-	-	-	-	-	-
		P	SE	-	-	-	-	-	-	-	-	-	-
108MP	Less Centralis Situs Depreciation	P	S	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
1081390	Accum Depr - Capital Lease	LABOR	SO	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
	Remove Capital Leases			-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
1081399	Accum Depr - Capital Lease	P	S	-	-	-	-	-	-	-	-	-	-
		P	SE	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
	Remove Capital Leases			-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-
<b>TOTAL GENERAL PLANT ACCUM DEPR</b>				<b>(182,134,308)</b>	<b>(29,608,770)</b>	<b>(24,148,548)</b>	<b>(115,129,133)</b>	<b>(1,449,296)</b>		<b>(3,395,635)</b>	<b>(6,554,651)</b>	<b>(1,848,254)</b>	
<b>TOTAL ACCUM DEPR - PLANT IN SERVICE</b>				<b>(3,565,614,879)</b>	<b>(1,736,797,433)</b>	<b>(577,959,187)</b>	<b>(1,198,772,966)</b>	<b>(16,682,364)</b>		<b>(3,395,635)</b>	<b>(30,159,839)</b>	<b>(1,848,254)</b>	
111SP	Accum Prov for Amort-Steam	P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
111GP	Accum Prov for Amort-General	D_SPLIT	S	(5,225,342)	-	-	(4,951,167)	(60,306)	-	-	(213,888)	-	-
		CSS_SYS	CN	-	-	-	-	-	-	-	-	-	-
		I-SG	SG	-	-	-	-	-	-	-	-	-	-
		LABOR	SO	(362,744)	(147,578)	(27,674)	(130,109)	(2,083)	(21,221)	(22,391)	(11,688)	-	-
		P	SE	(5,588,106)	(147,578)	(27,674)	(5,081,276)	(62,390)	(21,221)	(236,280)	(11,688)	-	-
111HP	Accum Prov for Amort-Hydro	P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-
		P	SG	(937,826)	(937,826)	-	-	-	-	-	-	-	-
		P	SG	-	-	-	-	-	-	-	-	-	-

			(937,826)	(937,826)	-	-	-	-	-	-	-
111IP	Accum Prov for Amort-Intangible Plant										
	D_SPLIT	S	(140,175)	-	-	(132,819)	(1,618)	-	-	(5,738)	-
	LABOR	SG	-	-	-	-	-	-	-	-	-
	LABOR	SG	(103,242)	(42,003)	(7,876)	(37,031)	(593)	-	(6,040)	(6,373)	(3,326)
	P	SE	21,110	21,110	-	-	-	-	-	-	-
	LABOR	SG	(30,054,368)	(12,227,272)	(2,292,838)	(10,779,893)	(172,602)	-	(1,758,234)	(1,855,171)	(968,358)
	I-SG	SG	(30,807,413)	(20,230,213)	(10,551,980)	(24,417)	-	-	-	(803)	-
	I-SG	SG	(1,550,215)	(1,017,975)	(530,971)	(1,229)	-	-	-	(40)	-
	CSS_SYS	CN	(56,627,623)	-	-	-	-	-	(25,104,913)	(13,213,112)	(18,309,598)
	P	SG	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-
	LABOR	SO	(91,991,024)	(37,425,483)	(7,017,966)	(32,995,315)	(528,304)	-	(3,381,639)	(5,678,347)	(2,963,971)
			(211,252,951)	(70,921,835)	(20,401,631)	(43,970,704)	(703,117)	-	(32,250,826)	(20,759,584)	(22,245,254)
111IP	Less Non-Utility Plant										
	NUTIL	OTH	-	-	-	-	-	-	-	-	-
			(211,252,951)	(70,921,835)	(20,401,631)	(43,970,704)	(703,117)	-	(32,250,826)	(20,759,584)	(22,245,254)
111390	Accum Amtr - Capital Lease										
	LABOR	S	-	-	-	-	-	-	-	-	-
	P	SG	-	-	-	-	-	-	-	-	-
	LABOR	SO	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-
	Remove Capital Lease Amtr		-	-	-	-	-	-	-	-	-
<b>TOTAL ACCUM PROV FOR AMORTIZATION</b>			<b>(217,778,883)</b>	<b>(72,007,240)</b>	<b>(20,419,304)</b>	<b>(49,051,980)</b>	<b>(765,506)</b>	-	<b>(32,272,047)</b>	<b>(20,995,863)</b>	<b>(22,256,942)</b>

Docket No. UE 399  
Exhibit PAC/2103  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith  
Updated Oregon Marginal Cost of Service Study Summary

July 2022



PACIFICORP  
STATE OF OREGON  
Oregon Marginal Cost Study  
20 Year Marginal Cost By Load Class  
12 Months Ended December 31, 2023 Forecast  
(Dollars in 000s)

Line	Class / Function	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
		Total	Residential (sec)	General Service - Schedule 23			General Service - Schedule 28				General Service - Schedule 30			Large Power Service - Schedule 48				Irrg - Sch 41 (sec)	Lighting Schs 15, 51, 53, 54 (sec)	
			0-15 kW (sec)	15+ kW (sec)	Primary (pri)	0-50 kW (sec)	51-100 kW (sec)	100+ kW (sec)	Primary (pri)	0-300 kW (sec)	300+ kW (sec)	Primary (pri)	1 - 4 MW (sec)	1 - 4 MW (pri)	> 4 MW (sec)	> 4 MW (pri)	Trn (trn)			
1	<b>Demand Related Marginal Cost</b>																			
2	Generation	\$219,936	\$107,480	\$8,552	\$9,330	\$44	\$6,792	\$10,072	\$12,853	\$344	\$2,783	\$13,845	\$1,425	\$7,168	\$6,551	\$487	\$11,761	\$17,328	\$3,121	\$0
3	Transmission	\$10,493	\$5,128	\$408	\$445	\$2	\$324	\$481	\$613	\$16	\$133	\$661	\$68	\$342	\$313	\$23	\$561	\$827	\$149	\$0
4	Distribution																			
5	Poles	\$44,524	\$23,605	\$2,590	\$2,889	\$12	\$1,332	\$1,985	\$2,568	\$65	\$406	\$2,030	\$200	\$2,253	\$2,035	\$5	\$124	\$0	\$2,342	\$83
6	Conductor	\$65,701	\$36,132	\$3,452	\$3,850	\$16	\$2,018	\$3,008	\$3,891	\$99	\$700	\$3,498	\$345	\$2,926	\$2,643	\$9	\$241	\$0	\$2,764	\$10
7	Substations	\$45,101	\$24,941	\$1,794	\$2,000	\$8	\$1,394	\$2,077	\$2,687	\$68	\$588	\$2,937	\$290	\$1,528	\$1,380	\$102	\$2,472	\$0	\$833	\$0
8	Transformers	\$9,493	\$5,566	\$683	\$424	\$0	\$440	\$725	\$570	\$0	\$103	\$390	\$0	\$195	\$0	\$13	\$0	\$0	\$345	\$38
9	<b>Total Demand</b>	<b>\$395,248</b>	<b>\$202,852</b>	<b>\$17,479</b>	<b>\$18,938</b>	<b>\$82</b>	<b>\$12,300</b>	<b>\$18,348</b>	<b>\$23,183</b>	<b>\$592</b>	<b>\$4,712</b>	<b>\$23,362</b>	<b>\$2,328</b>	<b>\$14,412</b>	<b>\$12,921</b>	<b>\$640</b>	<b>\$15,160</b>	<b>\$18,155</b>	<b>\$9,554</b>	<b>\$231</b>
10																				
11																				
12	<b>Energy Related Marginal Cost</b>																			
13	Generation	\$525,724	\$214,655	\$20,775	\$22,420	\$125	\$16,658	\$25,351	\$32,992	\$893	\$7,286	\$37,792	\$3,693	\$19,856	\$18,936	\$1,516	\$36,502	\$56,442	\$8,953	\$882
14	Transmission	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15	<b>Total Energy</b>	<b>\$525,724</b>	<b>\$214,655</b>	<b>\$20,775</b>	<b>\$22,420</b>	<b>\$125</b>	<b>\$16,658</b>	<b>\$25,351</b>	<b>\$32,992</b>	<b>\$893</b>	<b>\$7,286</b>	<b>\$37,792</b>	<b>\$3,693</b>	<b>\$19,856</b>	<b>\$18,936</b>	<b>\$1,516</b>	<b>\$36,502</b>	<b>\$56,442</b>	<b>\$8,953</b>	<b>\$882</b>
16																				
17	<b>Customer Related Marginal Cost</b>																			
18	Poles	\$55,856	\$42,660	\$8,783	\$1,813	\$14	\$387	\$286	\$162	\$6	\$12	\$30	\$3	\$12	\$8	\$0	\$0	\$0	\$1,680	\$0
19	Conductor	\$27,736	\$21,184	\$4,362	\$900	\$7	\$192	\$142	\$80	\$3	\$6	\$15	\$1	\$6	\$4	\$0	\$0	\$0	\$834	\$0
20	Transformers	\$76,245	\$46,311	\$12,168	\$3,336	\$0	\$3,458	\$2,905	\$1,776	\$0	\$214	\$534	\$0	\$93	\$0	\$1	\$0	\$0	\$5,450	\$0
21	Lighting	\$6,379	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,379
22	Service Drops	\$54,595	\$41,055	\$7,245	\$2,896	\$0	\$1,002	\$773	\$846	\$0	\$90	\$430	\$0	\$255	\$0	\$3	\$0	\$0	\$0	\$0
23	Meters	\$16,282	\$12,557	\$1,743	\$413	\$135	\$156	\$123	\$361	\$81	\$38	\$96	\$62	\$20	\$72	\$0	\$33	\$161	\$228	\$3
24	Meter Reading	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
25	Billing & Collections	\$16,770	\$13,430	\$2,119	\$437	\$3	\$170	\$125	\$71	\$2	\$7	\$19	\$2	\$27	\$18	\$0	\$8	\$2	\$132	\$196
26	Uncollectables	\$5,914	\$5,155	\$173	\$36	\$0	\$120	\$89	\$50	\$2	\$32	\$79	\$8	\$65	\$43	\$1	\$20	\$6	\$36	\$0
27	Customer Service / Other	\$5,964	\$4,955	\$642	\$132	\$1	\$49	\$36	\$21	\$1	\$3	\$8	\$1	\$4	\$3	\$0	\$1	\$0	\$41	\$66
28	<b>Total Customer (Commitment &amp; Billing)</b>	<b>\$265,740</b>	<b>\$187,308</b>	<b>\$37,235</b>	<b>\$9,964</b>	<b>\$162</b>	<b>\$5,533</b>	<b>\$4,480</b>	<b>\$3,367</b>	<b>\$94</b>	<b>\$401</b>	<b>\$1,209</b>	<b>\$77</b>	<b>\$481</b>	<b>\$147</b>	<b>\$5</b>	<b>\$62</b>	<b>\$169</b>	<b>\$8,402</b>	<b>\$6,644</b>
29																				
30																				
31	<b>Total Revenue @ Full MC</b>																			
32	Generation	\$745,660	\$322,134	\$29,327	\$31,750	\$168	\$23,450	\$35,423	\$45,845	\$1,237	\$10,069	\$51,638	\$5,117	\$27,024	\$25,486	\$2,003	\$48,263	\$73,770	\$12,074	\$882
33	Transmission	\$10,493	\$5,128	\$408	\$445	\$2	\$324	\$481	\$613	\$16	\$133	\$661	\$68	\$342	\$313	\$23	\$561	\$827	\$149	\$0
34	Distribution	\$379,250	\$241,454	\$41,077	\$18,108	\$58	\$10,223	\$11,901	\$12,581	\$240	\$2,118	\$9,864	\$840	\$7,267	\$6,069	\$133	\$2,837	\$0	\$14,249	\$231
35	Distribution-Lighting	\$6,379	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,379
36	Customer - Billing	\$16,770	\$13,430	\$2,119	\$437	\$3	\$170	\$125	\$71	\$2	\$7	\$19	\$2	\$27	\$18	\$0	\$8	\$2	\$132	\$196
37	Customer - Metering	\$16,282	\$12,557	\$1,743	\$413	\$135	\$156	\$123	\$361	\$81	\$38	\$96	\$62	\$20	\$72	\$0	\$33	\$161	\$228	\$3
38	Customer - Other	\$5,964	\$4,955	\$642	\$132	\$1	\$49	\$36	\$21	\$1	\$3	\$8	\$1	\$4	\$3	\$0	\$1	\$0	\$41	\$66
39	<b>Revenue (less Uncollectables)</b>	<b>\$1,180,798</b>	<b>\$599,660</b>	<b>\$75,315</b>	<b>\$51,286</b>	<b>\$368</b>	<b>\$34,371</b>	<b>\$48,090</b>	<b>\$59,491</b>	<b>\$1,578</b>	<b>\$12,369</b>	<b>\$62,284</b>	<b>\$6,090</b>	<b>\$34,684</b>	<b>\$31,960</b>	<b>\$2,160</b>	<b>\$51,704</b>	<b>\$74,760</b>	<b>\$26,873</b>	<b>\$7,757</b>
40																				
41	Customer - Uncollectables	\$5,914	\$5,155	\$173	\$36	\$0	\$120	\$89	\$50	\$2	\$32	\$79	\$8	\$65	\$43	\$1	\$20	\$6	\$36	\$0
42	<b>Total Revenue</b>	<b>\$1,186,712</b>	<b>\$604,815</b>	<b>\$75,488</b>	<b>\$51,322</b>	<b>\$368</b>	<b>\$34,492</b>	<b>\$48,178</b>	<b>\$59,541</b>	<b>\$1,579</b>	<b>\$12,400</b>	<b>\$62,363</b>	<b>\$6,098</b>	<b>\$34,749</b>	<b>\$32,004</b>	<b>\$2,160</b>	<b>\$51,724</b>	<b>\$74,766</b>	<b>\$26,909</b>	<b>\$7,757</b>

Docket No. UE 399  
Exhibit PAC/2104  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith  
Updated Unbundled Revenue Requirement Allocation

July 2022

PACIFICORP  
STATE OF OREGON  
Combined GRC and TAM  
December 31, 2023 Unbundled Revenue Requirement Allocation by Load Class

Line	Description	Total	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	Lighting Detail			
			Residential	General Service			General Service		General Service		Large Power Service			Irrigation	Lighting	Schs 15 & 51	Sch 53	Sch 54
			(sec)	Sch 23	(pri)	(sec)	(pri)	(sec)	(pri)	(sec)	(pri)	(sec)	(pri)	(tm)	(sec)	Schs 15, 51, 53, and 54	(sec)	(sec)
1	Total Operating Revenues	\$1,236,909	\$597,063	\$124,106	\$332	\$161,664	\$2,068	\$86,965	\$7,232	\$41,980	\$96,972	\$87,395	\$25,981	\$5,151	\$4,413	\$657	\$82	
2	MWh	13,886,900	5,633,856	1,133,687	3,324	1,968,466	23,804	1,183,142	98,439	560,926	1,477,894	1,545,236	234,973	23,152	10,559	11,452	1,141	
3																		
4	Functionalized 20 Year Full Marginal Costs - Class \$																	
5	Generation	\$745,660	\$322,134	\$61,076	\$168	\$104,717	\$1,237	\$61,707	\$5,117	\$29,027	\$73,749	\$73,770	\$12,074	\$882	\$402	\$436	\$43	
6	Transmission	\$10,493	\$5,128	\$853	\$2	\$1,418	\$16	\$793	\$68	\$365	\$874	\$827	\$149	\$0	\$0	\$0	\$0	
7	Distribution	\$379,250	\$241,454	\$59,185	\$58	\$34,706	\$240	\$11,981	\$840	\$7,400	\$8,906	\$0	\$14,249	\$231	\$208	\$12	\$11	
8	Distribution-Lighting	\$6,379	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,379	\$6,379	\$0	\$0	
9	Customer - Billing	\$16,770	\$13,430	\$2,556	\$3	\$366	\$2	\$26	\$2	\$27	\$26	\$2	\$132	\$196	\$185	\$8	\$3	
10	Customer - Metering	\$16,282	\$12,557	\$2,157	\$135	\$640	\$81	\$134	\$62	\$20	\$105	\$161	\$228	\$3	\$0	\$0	\$3	
11	Customer - Other	\$5,964	\$4,955	\$774	\$1	\$106	\$1	\$11	\$1	\$4	\$4	\$0	\$41	\$66	\$62	\$3	\$1	
12	Total	\$1,180,798	\$599,660	\$126,601	\$368	\$141,952	\$1,578	\$74,653	\$6,090	\$36,843	\$83,664	\$74,760	\$26,873	\$7,757	\$7,237	\$459	\$60	
13																		
14	Functional Revenue Requirement Allocation Factors																	
15	Functionalized 20 Year Full Marginal Costs - Class % of Total																	
16	Generation	100.00%	43.20%	8.19%	0.02%	14.04%	0.17%	8.28%	0.69%	3.89%	9.89%	9.89%	1.62%	0.12%	0.05%	0.06%	0.01%	
17	Transmission	100.00%	48.87%	13.13%	0.02%	13.51%	0.16%	7.56%	0.65%	3.48%	8.33%	7.88%	1.42%	0.00%	0.00%	0.00%	0.00%	
18	Distribution	100.00%	63.67%	15.61%	0.02%	9.15%	0.06%	3.16%	0.22%	1.95%	2.35%	0.00%	3.76%	0.06%	0.05%	0.00%	0.00%	
19	Distribution-Lighting	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	100.00%	0.00%	0.00%	
20	Ancillary Service	100.00%	43.20%	8.19%	0.02%	14.04%	0.17%	8.28%	0.69%	3.89%	9.89%	9.89%	1.62%	0.12%	0.05%	0.06%	0.01%	
21	Customer - Billing	100.00%	80.09%	15.24%	0.02%	2.18%	0.01%	0.16%	0.01%	0.16%	0.15%	0.01%	0.79%	1.17%	1.10%	0.05%	0.02%	
22	Customer - Metering	100.00%	77.12%	13.25%	0.83%	3.93%	0.50%	0.82%	0.38%	0.12%	0.64%	0.99%	1.40%	0.02%	0.00%	0.00%	0.02%	
23	Customer - Other	100.00%	83.09%	12.98%	0.02%	1.78%	0.01%	0.18%	0.01%	0.07%	0.07%	0.01%	0.69%	1.10%	1.04%	0.05%	0.02%	
24	Embedded DSM - (MWh)	100.00%	40.57%	8.16%	0.02%	14.17%	0.17%	8.52%	0.71%	4.04%	10.64%	11.13%	1.69%	0.17%	0.08%	0.08%	0.01%	
25	Regulatory & Franchise - (Total Operating Revenues)	100.00%	50.34%	10.27%	0.03%	12.31%	0.14%	6.58%	0.54%	3.20%	7.40%	6.74%	2.12%	0.32%	0.28%	0.04%	0.00%	
26																		
27																		
28	Functionalized Class Revenue Requirement - (Target)																	
29	Generation	\$764,020	\$330,067	\$62,580	\$173	\$107,296	\$1,267	\$63,226	\$5,243	\$29,742	\$75,365	\$75,586	\$12,371	\$904	\$412	\$447	\$45	
30	Transmission	\$179,558	\$87,748	\$14,599	\$36	\$24,261	\$281	\$13,575	\$1,163	\$6,250	\$14,950	\$14,147	\$2,548	\$0	\$0	\$0	\$0	
31	Distribution	\$354,225	\$225,522	\$55,280	\$54	\$32,416	\$224	\$11,191	\$785	\$6,912	\$8,319	\$0	\$13,309	\$216	\$195	\$11	\$10	
32	Distribution-Lighting	\$3,019	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,019	\$3,019	\$0	\$0	
33	Distribution Total	\$357,245	\$225,522	\$55,280	\$54	\$32,416	\$224	\$11,191	\$785	\$6,912	\$8,319	\$0	\$13,309	\$3,235	\$3,213	\$11	\$10	
34	Ancillary Services	\$23,549	\$10,173	\$1,929	\$5	\$3,307	\$39	\$1,949	\$162	\$917	\$2,329	\$2,330	\$381	\$28	\$13	\$14	\$1	
35	Customer - Billing	\$15,134	\$12,120	\$2,307	\$3	\$330	\$2	\$24	\$2	\$24	\$23	\$2	\$119	\$177	\$167	\$8	\$2	
36	Customer - Metering	\$20,901	\$16,119	\$2,768	\$174	\$821	\$104	\$172	\$80	\$26	\$134	\$207	\$292	\$3	\$0	\$0	\$3	
37	Customer - Other	\$9,236	\$7,674	\$1,199	\$2	\$164	\$1	\$17	\$1	\$6	\$6	\$1	\$63	\$102	\$96	\$4	\$1	
38	Embedded DSM - (MWh)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
39	Franchise Fees	\$38,752	\$19,506	\$3,980	\$13	\$4,770	\$54	\$2,551	\$210	\$1,241	\$2,867	\$2,611	\$823	\$126	\$110	\$14	\$2	
40	Total	\$1,408,395	\$708,930	\$144,641	\$459	\$173,365	\$1,973	\$92,705	\$7,646	\$45,118	\$104,194	\$94,883	\$29,907	\$4,575	\$4,013	\$498	\$65	
41																		
42	Ratio of Operating Revn to Revenue Requirement (Target)	87.82%	84.22%	85.80%	72.39%	93.25%	104.82%	93.81%	94.58%	93.05%	93.07%	92.11%	86.87%	112.59%	109.97%	131.99%	125.99%	
43	(Line 1 / Line 40)																	
44																		
45	Increase or (Decrease)	\$171,486	\$111,866	\$20,535	\$127	\$11,701	(\$95)	\$5,740	\$414	\$3,138	\$7,222	\$7,488	\$3,926	(\$576)	(\$400)	(\$159)	(\$17)	
46	(Line 40 - Line 1)																	
47																		
48																		
49	Percent Increase (Decrease)	13.86%	18.74%	16.55%	38.14%	7.24%	-4.60%	6.60%	5.73%	7.47%	7.45%	8.57%	15.11%	-11.18%	-9.07%	-24.24%	-20.63%	
50	(Line 45 / Line 1)																	

PACIFICORP  
STATE OF OREGON  
Combined GRC and TAM  
Oregon Marginal Cost Study  
December 31, 2023 Functionalized Revenue - Earned  
(\$ 000)

Line No.	Description	A Production	B Transmission	C Distribution	D Dist-Lighting	E Ancillary	F C Billing	G C Metering	I C Other	J Franchise Fees	K Total
1	Earned Functional Revenue Requirement	\$714,187	\$125,865	\$302,796	\$2,462	\$23,848	\$14,775	\$17,491	\$9,102	\$35,038	\$1,245,563
2											
3	Percent of Total	57.34%	10.11%	24.31%	0.20%	1.91%	1.19%	1.40%	0.73%	2.81%	100.00%
4											
5	Revenue From Classes Included in MC Study	\$709,225	\$124,991	\$300,692	\$2,445	\$23,682	\$14,672	\$17,369	\$9,038	\$34,794	\$1,236,909
6	Revenue Requirement Cap Adjustment										\$0
7											
8	Other Revenues										
9	Schedule 4 - Employee Discount										(\$341)
10	Partial Requirements - Sch. 47 pri										\$1,607
11	Partial Requirements - Sch. 47 tm										\$2,367
12	Sch 848										\$1,805
13	Oregon Direct Access Opt Out Amortization										\$1,767
14	Paperless Credit										(\$2,072)
15	AGA										\$3,521
16											
17	Total Oregon Situs Revenue										\$1,245,563

PACIFICORP  
STATE OF OREGON  
Combined GRC and TAM  
Oregon Marginal Cost Study  
December 31, 2023 Functionalized Revenue - Target  
(\$ 000)

Line No.	Description	A Production	B Transmission	C Distribution	D Dist-Lighting	E Ancillary	F C Billing	G C Metering	I C Other	J Franchise Fees	K Total	
1	Target Functional Revenue Requirement	\$773,720	\$181,837	\$358,722	\$3,058	\$23,848	\$15,326	\$21,167	\$9,353	\$39,244	\$1,426,275	
2												
3	Percent of Total	54.25%	12.75%	25.15%	0.21%	1.67%	1.07%	1.48%	0.66%	2.75%	100.00%	
4												
5	Revenue From Classes Included in MC Study	\$764,020	\$179,558	\$354,225	\$3,019	\$23,549	\$15,134	\$20,901	\$9,236	\$38,752	\$1,408,395	Increase \$171,486
6												
7	Revenue Requirement Cap Adjustment										\$9,742	\$9,742
8												
9	Other Revenues											
10	Schedule 4 - Employee Discount										(\$403)	(\$62)
11	Partial Requirements - Sch. 47 pri										\$1,644	\$37
12	Partial Requirements - Sch. 47 trn										\$2,302	(\$64)
13	Sch 848										\$1,378	(\$427)
14	Oregon Direct Access Opt Out Amortization										\$1,767	\$0
15	Paperless Credit										(\$2,072)	\$0
16	AGA										\$3,521	(\$0)
17	Total Oregon Situs Revenue										\$1,426,275	

PACIFICORP  
 State of Oregon  
 December 31, 2023 Unbundled Revenue Requirement Allocation by Load Class  
 FERC Transmission Revenue (\$ 000)

Line	Description	Total	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
			Residential (sec)	General Service Schedule 23 (sec)	General Service Schedule 23 (pri)	General Service Schedule 28 (sec)	General Service Schedule 28 (pri)	General Service Schedule 30 (sec)	General Service Schedule 30 (pri)	Large Power Service Schedule 48 (sec)	Large Power Service Schedule 48 (pri)	Large Power Service Schedule 48 (tm)	Schedule 41 Irrigation	Lighting (sec)
1	Total Transmission Revenue Requirement	\$179,558	\$87,748	\$14,599	\$36	\$24,261	\$281	\$13,575	\$1,163	\$6,250	\$14,950	\$14,147	\$2,548	\$0
2														
3	FERC Transmission													
4	Peak MW @ Input	2,358	1,152	192	0	319	4	178	15	82	196	186	33	0
5	% of Total	100.00%	48.87%	8.13%	0.02%	13.51%	0.16%	7.56%	0.65%	3.48%	8.33%	7.88%	1.42%	0.00%
6	FERC Transmission Revenues (\$ 000)	\$84,946	\$41,512	\$6,907	\$17	\$11,478	\$133	\$6,422	\$550	\$2,957	\$7,073	\$6,693	\$1,206	\$0
7														
8	Other Transmission Revenue Requirement	\$94,612	\$46,236	\$7,692	\$19	\$12,784	\$148	\$7,153	\$613	\$3,293	\$7,877	\$7,454	\$1,343	\$0

OR CP (MW)

Jan	2,655
Feb	2,484
Mar	2,379
Apr	2,196
May	1,917
Jun	2,051
Jul	2,409
Aug	2,474
Sep	2,161
Oct	1,901
Nov	2,196
Dec	2,398
Annual Average	2,268

Network service rate (\$/MW-year) <sup>1</sup>	\$37,449
FERC Transmission Revenues	\$84,946,194

<sup>1</sup>From 2021 Transmission Formula Rate Annual Update p.14

Docket No. UE 399  
Exhibit PAC/2105  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith  
Updated Target Functionalized Revenues and Billing Determinants

July 2022

**PACIFIC POWER  
STATE OF OREGON  
Functionalized Revenue Targets and Summary of Proposed Functionalized Revenues  
Forecast 12 Months Ended December 31, 2023**

Rate Schedule	Present Revenues (\$000)	Cost of Service Revenues (\$000)	Target with Unadjusted NPC Revenues (\$000)	Summary of Proposed Functionalized Revenues (\$000)	
					(1)
<b>Schedule 4, Residential</b>					
Transmission & Ancillary Services <sup>1</sup>	\$46,085	\$51,685	\$51,685	\$51,662	
System Usage- Schedule 200 Related	\$3,775	\$4,538	\$4,538	\$4,563	
System Usage- T&A and Schedule 201 Related	\$4,451	\$5,965	\$5,965	\$5,972	
Distribution	\$257,562	\$316,674	\$316,674	\$316,665	
Other Adjustments	\$1,282	\$0	\$0	\$0	
Generation Energy - Other (non-NPC) (Sch 200)	\$160,615	\$164,944	\$164,944	\$164,968	
Generation Energy - Net Power Costs (Sch 201)	\$123,294	\$165,123	\$123,294	\$123,294	
<b>Total</b>	<b>\$597,063</b>	<b>\$708,930</b>	<b>\$667,101</b>	<b>\$667,125</b>	
<b>Schedule 23, Small General Service</b>					
Transmission & Ancillary Services <sup>1</sup>	\$8,220	\$8,858	\$8,858	\$8,857	
System Usage- Schedule 200 Related	\$694	\$863	\$863	\$864	
System Usage- T&A and Schedule 201 Related	\$819	\$1,107	\$1,107	\$1,103	
Distribution	\$60,110	\$71,519	\$71,519	\$71,514	
Other Adjustments	\$247	\$0	\$0	\$0	
Generation Energy - Other (non-NPC) (Sch 200)	\$30,769	\$31,359	\$31,359	\$31,360	
Generation Energy - Net Power Costs (Sch 201)	\$23,580	\$31,393	\$23,580	\$23,580	
<b>Total</b>	<b>\$124,438</b>	<b>\$145,099</b>	<b>\$137,286</b>	<b>\$137,278</b>	
<b>Schedule 28, General Service 31-200kW</b>					
Secondary Voltage					
Transmission & Ancillary Services <sup>1</sup>	\$15,275	\$14,785	\$14,785	\$14,789	
System Usage- Schedule 200 Related	\$1,339	\$1,475	\$1,475	\$1,476	
System Usage- T&A and Schedule 201 Related	\$1,555	\$1,884	\$1,884	\$1,890	
Distribution	\$48,399	\$47,926	\$47,926	\$47,901	
Other Adjustments	\$433	\$0	\$0	\$0	
Generation Energy - Other (non-NPC) (Sch 200)	\$53,582	\$53,619	\$53,619	\$53,621	
Generation Energy - Net Power Costs (Sch 201)	\$41,082	\$53,677	\$41,082	\$41,082	
<b>Total</b>	<b>\$161,664</b>	<b>\$173,365</b>	<b>\$160,770</b>	<b>\$160,759</b>	
Primary Voltage					
Transmission & Ancillary Services <sup>1</sup>	\$220	\$172	\$172	\$172	
System Usage- Schedule 200 Related	\$15	\$17	\$17	\$17	
System Usage- T&A and Schedule 201 Related	\$18	\$22	\$22	\$22	
Distribution	\$676	\$494	\$494	\$494	
Other Adjustments	\$5	\$0	\$0	\$0	
Generation Energy - Other (non-NPC) (Sch 200)	\$642	\$633	\$633	\$633	
Generation Energy - Net Power Costs (Sch 201)	\$492	\$634	\$492	\$492	
<b>Total</b>	<b>\$2,068</b>	<b>\$1,973</b>	<b>\$1,832</b>	<b>\$1,832</b>	
<b>Schedule 30, General Service 201-999kW</b>					
Secondary Voltage					
Transmission & Ancillary Services <sup>1</sup>	\$8,377	\$8,371	\$8,371	\$8,377	
System Usage- Schedule 200 Related	\$769	\$869	\$869	\$864	
System Usage- T&A and Schedule 201 Related	\$899	\$1,101	\$1,101	\$1,100	
Distribution	\$21,015	\$19,137	\$19,137	\$19,106	
Other Adjustments	\$248	\$0	\$0	\$0	
Generation Energy - Other (non-NPC) (Sch 200)	\$31,568	\$31,596	\$31,596	\$31,621	
Generation Energy - Net Power Costs (Sch 201)	\$24,089	\$31,630	\$24,089	\$24,089	
<b>Total</b>	<b>\$86,965</b>	<b>\$92,705</b>	<b>\$85,163</b>	<b>\$85,157</b>	
Primary Voltage					
Transmission & Ancillary Services <sup>1</sup>	\$700	\$712	\$712	\$711	
System Usage- Schedule 200 Related	\$63	\$72	\$72	\$72	
System Usage- T&A and Schedule 201 Related	\$75	\$92	\$92	\$92	
Distribution	\$1,715	\$1,527	\$1,527	\$1,525	
Other Adjustments	\$22	\$0	\$0	\$0	
Generation Energy - Other (non-NPC) (Sch 200)	\$2,621	\$2,620	\$2,620	\$2,623	
Generation Energy - Net Power Costs (Sch 201)	\$2,036	\$2,623	\$2,036	\$2,036	
<b>Total</b>	<b>\$7,232</b>	<b>\$7,646</b>	<b>\$7,059</b>	<b>\$7,058</b>	
<b>Schedule 41, Agricultural Pumping Service</b>					
Transmission & Ancillary Services <sup>1</sup>	\$1,511	\$1,587	\$1,587	\$1,586	
System Usage- Schedule 200 Related	\$134	\$214	\$214	\$214	
System Usage- T&A and Schedule 201 Related	\$209	\$170	\$170	\$169	
Distribution	\$13,384	\$15,565	\$15,565	\$15,564	
Other Adjustments	\$49	\$0	\$0	\$0	
Generation Energy - Other (non-NPC) (Sch 200)	\$6,055	\$6,182	\$6,182	\$6,182	
Generation Energy - Net Power Costs (Sch 201)	\$4,638	\$6,189	\$4,638	\$4,638	
<b>Total</b>	<b>\$25,981</b>	<b>\$29,907</b>	<b>\$28,357</b>	<b>\$28,354</b>	



**PACIFIC POWER  
STATE OF OREGON  
Functionalized Revenue Targets and Summary of Proposed Functionalized Revenues  
Forecast 12 Months Ended December 31, 2023**

Rate Schedule	Present Revenues (\$000)	Cost of Service Revenues (\$000)	Target with Unadjusted NPC Revenues (\$000)	Summary of Proposed Functionalized Revenues (\$000)
(1)	(2)	(3)	(4)	(5)
<b>Schedule 48, Large General Service, 1,000kW and over</b>				
Secondary Voltage				
Transmission & Ancillary Services <sup>1</sup>	\$3,877	\$3,873	\$3,873	\$3,877
System Usage- Schedule 200 Related	\$337	\$409	\$409	\$409
System Usage- T&A and Schedule 201 Related	\$393	\$516	\$516	\$516
Distribution	\$10,959	\$10,578	\$10,578	\$10,575
Other Adjustments	\$122	\$0	\$0	\$0
Generation Energy - Other (non-NPC) (Sch 200)	\$14,874	\$14,863	\$14,863	\$14,863
Generation Energy - Net Power Costs (Sch 201)	\$11,419	\$14,879	\$11,419	\$11,419
<b>Total</b>	<b>\$41,980</b>	<b>\$45,118</b>	<b>\$41,658</b>	<b>\$41,659</b>
Primary Voltage				
Transmission & Ancillary Services <sup>1</sup>	\$9,413	\$9,402	\$9,402	\$9,413
System Usage- Schedule 200 Related	\$872	\$1,039	\$1,039	\$1,035
System Usage- T&A and Schedule 201 Related	\$1,005	\$1,299	\$1,299	\$1,301
Distribution	\$19,022	\$16,889	\$16,889	\$16,887
Other Adjustments	\$305	\$0	\$0	\$0
Generation Energy - Other (non-NPC) (Sch 200)	\$37,587	\$37,762	\$37,762	\$37,751
Generation Energy - Net Power Costs (Sch 201)	\$28,768	\$37,803	\$28,768	\$28,768
<b>Total</b>	<b>\$96,972</b>	<b>\$104,194</b>	<b>\$95,159</b>	<b>\$95,155</b>
Transmission Voltage				
Transmission & Ancillary Services <sup>1</sup>	\$9,388	\$9,022	\$9,022	\$9,017
System Usage- Schedule 200 Related	\$896	\$1,039	\$1,039	\$1,035
System Usage- T&A and Schedule 201 Related	\$1,020	\$1,289	\$1,289	\$1,283
Distribution	\$10,364	\$7,946	\$7,946	\$7,936
Other Adjustments	\$294	\$0	\$0	\$0
Generation Energy - Other (non-NPC) (Sch 200)	\$37,159	\$37,773	\$37,773	\$37,805
Generation Energy - Net Power Costs (Sch 201)	\$28,274	\$37,814	\$28,274	\$28,274
<b>Total</b>	<b>\$87,395</b>	<b>\$94,883</b>	<b>\$85,343</b>	<b>\$85,350</b>
<b>Schedules 15, 51, 53, 54 Lighting</b>				
Secondary Voltage				
Transmission & Ancillary Services <sup>1</sup>	\$39	\$28	\$28	\$27
System Usage- Schedule 200 Related	\$15	\$12	\$12	\$13
System Usage- T&A and Schedule 201 Related	\$14	\$13	\$13	\$14
Distribution	\$4,102	\$3,618	\$3,618	\$3,618
Other Adjustments	\$4	\$0	\$0	\$0
Generation Energy - Other (non-NPC) (Sch 200)	\$567	\$452	\$452	\$452
Generation Energy - Net Power Costs (Sch 201)	\$410	\$452	\$410	\$410
<b>Total</b>	<b>\$5,151</b>	<b>\$4,575</b>	<b>\$4,533</b>	<b>\$4,535</b>
<b>TOTAL</b>	<b>\$1,236,909</b>	<b>\$1,408,395</b>	<b>\$1,314,261</b>	<b>\$1,314,261</b>
Employee Discount	-\$341		-\$380	-\$380
Additional Rate Schedules				
Schedule 47	\$3,974		\$3,775	\$3,775
Schedule 848	\$1,805		\$1,378	\$1,378
<b>Total Oregon</b>	<b>\$1,242,347</b>		<b>\$1,319,034</b>	<b>\$1,319,034</b>
		<b>Revenue Increase</b>	<b>\$76,687</b>	<b>\$76,687</b>

<sup>1</sup>Includes only FERC transmission plus ancillary services revenues. Non-FERC transmission revenues are recovered through distribution charges.

PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 4</b>							
<b>Residential Service</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	5,769,399,104	5,755,783,167	5,633,856,479 kWh	0.818 ¢	\$46,084,946	0.917 ¢	\$51,662,464
<b>System Usage Charge</b>							
Sch 200 related, per kWh	5,769,399,104	5,755,783,167	5,633,856,479 kWh	0.067 ¢	\$3,774,684	0.081 ¢	\$4,563,424
T&A and Sch 201 related, per kWh	5,769,399,104	5,755,783,167	5,633,856,479 kWh	0.079 ¢	\$4,450,747	0.106 ¢	\$5,971,888
<b>Distribution Charge</b>							
Basic Charge Single Family, per month	4,970,309	4,970,309	5,116,973 bill	\$9.50	\$48,611,244	\$12.00	\$61,403,676
Basic Charge Multi Family, per month	1,266,367	1,266,367	1,303,735 bill	\$8.00	\$10,429,880	\$8.00	\$10,429,880
Total Bills	6,236,676	6,236,676	6,420,708 bill				
Three Phase Demand Charge, per kW demand	16,025	16,025	15,686 kW	\$2.20	\$34,509	\$2.20	\$34,509
Three Phase Minimum Demand Charge, per month	1,373	1,373	1,414 bill	\$3.80	\$5,373	\$3.80	\$5,373
Distribution Energy Charge, per kWh	5,769,399,104	5,755,783,167	5,633,856,479 kWh	3.523 ¢	\$198,480,764	4.345 ¢	\$244,791,064
<b>Energy Charge - Schedule 200</b>							
First Block kWh (0-1,000)	4,325,370,839	4,315,161,839	4,223,752,316 kWh	2.732 ¢	\$115,392,913		
Second Block kWh (> 1,000)	1,444,028,265	1,440,621,328	1,410,104,163 kWh	3.207 ¢	\$45,222,041		
Summer kWh			1,572,474,819 kWh			3.613 ¢	\$56,813,515
Winter kWh			4,061,381,660 kWh			2.663 ¢	\$108,154,594
<b>Subtotal</b>	<b>5,769,399,104</b>	<b>5,755,783,167</b>	<b>5,633,856,479 kWh</b>		<b>\$472,487,101</b>		<b>\$543,830,387</b>
TAM Adj for Other Revs (205)							
First Block kWh (0-1,000)	4,325,370,839	4,315,161,839	4,223,752,316 kWh	0.021 ¢	\$886,988	0.000 ¢	\$0
Second Block kWh (> 1,000)	1,444,028,265	1,440,621,328	1,410,104,163 kWh	0.028 ¢	\$394,829	0.000 ¢	\$0
<b>Subtotal</b>					<b>\$473,768,918</b>		<b>\$543,830,387</b>
<b>Schedule 201</b>							
First Block kWh (0-1,000)	4,325,370,839	4,315,161,839	4,223,752,316 kWh	2.016 ¢	\$85,150,847	2.016 ¢	\$85,150,847
Second Block kWh (> 1,000)	1,444,028,265	1,440,621,328	1,410,104,163 kWh	2.705 ¢	\$38,143,318	2.705 ¢	\$38,143,318
<b>Total</b>	<b>5,769,399,104</b>	<b>5,755,783,167</b>	<b>5,633,856,479 kWh</b>		<b>\$597,063,083</b>		<b>\$667,124,552</b>
						Change	\$70,061,469
<b>Schedule No. 4 (Employee Discount)</b>							
<b>Residential Service</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	13,311,491	13,311,491	13,029,509 kWh	0.818 ¢	\$106,581	0.917 ¢	\$119,481
<b>System Usage Charge</b>							
Sch 200 related, per kWh	13,311,491	13,311,491	13,029,509 kWh	0.067 ¢	\$8,730	0.081 ¢	\$10,554
T&A and Sch 201 related, per kWh	13,311,491	13,311,491	13,029,509 kWh	0.079 ¢	\$10,293	0.106 ¢	\$13,811
<b>Distribution Charge</b>							
Basic Charge Single Family, per month	10,775	10,775	11,093 bill	\$9.50	\$105,384	\$12.00	\$133,116
Basic Charge Multi Family, per month	480	480	494 bill	\$8.00	\$3,952	\$8.00	\$3,952
Total Bills	11,255	11,255	11,587 bill				
Three Phase Demand Charge, per kW demand	0	0	0 kWh	\$2.20	\$0	\$2.20	\$0
Three Phase Minimum Demand Charge, per month	0	0	0 bill	\$3.80	\$0	\$3.80	\$0
Distribution Energy Charge, per kWh	13,311,491	13,311,491	13,029,509 kWh	3.523 ¢	\$459,030	4.345 ¢	\$566,132
<b>Energy Charge - Schedule 200</b>							
First Block kWh (0-1,000)	9,240,455	9,240,455	9,044,711 kWh	2.732 ¢	\$247,102		
Second Block kWh (> 1,000)	4,071,036	4,071,036	3,984,798 kWh	3.207 ¢	\$127,792		
Summer kWh			3,636,687 kWh			3.613 ¢	\$131,394
Winter kWh			9,392,822 kWh			2.663 ¢	\$250,131
<b>Subtotal</b>	<b>13,311,491</b>	<b>13,311,491</b>	<b>13,029,509 kWh</b>		<b>\$1,068,864</b>		<b>\$1,228,571</b>
TAM Adj for Other Revs (205)							
First Block kWh (0-1,000)	9,240,455	9,240,455	9,044,711 kWh	0.021 ¢	\$1,899	0.000 ¢	\$0
Second Block kWh (> 1,000)	4,071,036	4,071,036	3,984,798 kWh	0.028 ¢	\$1,116	0.000 ¢	\$0
<b>Subtotal</b>					<b>\$1,071,879</b>		<b>\$1,228,571</b>
<b>Schedule 201</b>							
First Block kWh (0-1,000)	9,240,455	9,240,455	9,044,711 kWh	2.016 ¢	\$182,341	2.016 ¢	\$182,341
Second Block kWh (> 1,000)	4,071,036	4,071,036	3,984,798 kWh	2.705 ¢	\$107,789	2.705 ¢	\$107,789
<b>Total</b>	<b>13,311,491</b>	<b>13,311,491</b>	<b>13,029,509 kWh</b>		<b>\$1,362,009</b>		<b>\$1,518,701</b>
Schedule 201 Employee Discount					(\$72,533)		(\$72,533)
<b>Total Employee Discount</b>					<b>(\$340,502)</b>		<b>(\$379,675)</b>
						Change	(\$39,173)

PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 23/723 - Composite</b>							
<b>General Service (Secondary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	1,179,290,680	1,169,546,266	1,133,686,986 kWh	0.723 ¢	\$8,196,557	0.779 ¢	\$8,831,422
<b>System Usage Charge</b>							
Sch 200 related, per kWh	1,179,290,680	1,169,546,266	1,133,686,986 kWh	0.061 ¢	\$691,549	0.076 ¢	\$861,602
T&A and Sch 201 related, per kWh	1,179,290,680	1,169,546,266	1,133,686,986 kWh	0.072 ¢	\$816,255	0.097 ¢	\$1,099,676
<b>Distribution Charge</b>							
<b>Basic Charge</b>							
Single Phase, per month	775,694	775,694	775,779 bill	\$17.35	\$13,459,766	\$17.35	\$13,459,766
Three Phase, per month	240,969	240,969	239,153 bill	\$25.90	\$6,194,063	\$25.90	\$6,194,063
<b>Load Size Charge</b>							
≤ 15 kW				No Charge		No Charge	
per kW for all kW in excess of 15 kW	1,142,229	1,142,229	1,106,759 kW	\$1.40	\$1,549,463	\$1.65	\$1,826,152
Demand Charge, the first 15 kW of demand				No Charge		No Charge	
Demand Charge, per kW for all kW in excess of 15 kW	564,595	564,595	547,081 kW	\$4.64	\$2,538,456	\$5.52	\$3,019,887
Reactive Power Charge, per kvar	216,881	216,881	209,593 kvar	65.00 ¢	\$136,235	65.00 ¢	\$136,235
Distribution Energy Charge, per kWh	1,179,290,680	1,169,546,266	1,133,686,986 kWh	3.182 ¢	\$36,073,920	4.118 ¢	\$46,685,230
<b>Energy Charge - Schedule 200</b>							
1st 3,000 kWh, per kWh	924,695,576	917,115,576	889,068,833 kWh	2.866 ¢	\$25,480,713	2.921 ¢	\$25,969,701
All additional kWh, per kWh	254,595,104	252,430,690	244,618,153 kWh	2.128 ¢	\$5,205,474	2.169 ¢	\$5,305,768
<b>Subtotal</b>	<b>1,179,290,680</b>	<b>1,169,546,266</b>	<b>1,133,686,986 kWh</b>		<b>\$100,342,451</b>		<b>\$113,389,502</b>
<b>TAM Adj for Other Revs (205)</b>							
1st 3,000 kWh, per kWh	924,695,576	917,115,576	889,068,833 kWh	0.023 ¢	\$204,486	0.000 ¢	\$0
All additional kWh, per kWh	254,595,104	252,430,690	244,618,153 kWh	0.017 ¢	\$41,585	0.000 ¢	\$0
<b>Subtotal</b>					<b>\$100,588,522</b>		<b>\$113,389,502</b>
<b>Schedule 201</b>							
1st 3,000 kWh, per kWh	924,695,576	917,115,576	889,068,833 kWh	2.197 ¢	\$19,532,842	2.197 ¢	\$19,532,842
All additional kWh, per kWh	254,595,104	252,430,690	244,618,153 kWh	1.629 ¢	\$3,984,830	1.629 ¢	\$3,984,830
<b>Total</b>	<b>1,179,290,680</b>	<b>1,169,546,266</b>	<b>1,133,686,986 kWh</b>		<b>\$124,106,194</b>	<b>Change</b>	<b>\$136,907,174</b>
							<b>\$12,800,980</b>
<b>Schedule No. 23/723 - Composite</b>							
<b>General Service (Primary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	3,442,654	3,442,654	3,323,737 kWh	0.712 ¢	\$23,665	0.767 ¢	\$25,493
<b>System Usage Charge</b>							
Sch 200 related, per kWh	3,442,654	3,442,654	3,323,737 kWh	0.060 ¢	\$1,994	0.075 ¢	\$2,493
T&A and Sch 201 related, per kWh	3,442,654	3,442,654	3,323,737 kWh	0.071 ¢	\$2,360	0.095 ¢	\$3,158
<b>Distribution Charge</b>							
<b>Basic Charge</b>							
Single Phase, per month	685	685	682 bill	\$17.35	\$11,833	\$17.35	\$11,833
Three Phase, per month	703	703	697 bill	\$25.90	\$18,052	\$25.90	\$18,052
<b>Load Size Charge</b>							
≤ 15 kW				No Charge		No Charge	
per kW for all kW in excess of 15 kW	7,379	7,379	7,143 kW	\$1.40	\$10,000	\$1.65	\$11,786
Demand Charge, the first 15 kW of demand				No Charge		No Charge	
Demand Charge, per kW for all kW in excess of 15 kW	2,821	2,821	2,732 kW	\$4.58	\$12,513	\$5.45	\$14,889
Reactive Power Charge, per kvar	2,717	2,717	2,599 kvar	60.00 ¢	\$1,559	60.00 ¢	\$1,559
Distribution Energy Charge, per kWh	3,442,654	3,442,654	3,323,737 kWh	3.133 ¢	\$104,133	4.054 ¢	\$134,744
<b>Energy Charge - Schedule 200</b>							
1st 3,000 kWh, per kWh	1,866,264	1,866,264	1,804,482 kWh	2.822 ¢	\$50,922	2.876 ¢	\$51,897
All additional kWh, per kWh	1,576,390	1,576,390	1,519,255 kWh	2.095 ¢	\$31,828	2.135 ¢	\$32,436
<b>Subtotal</b>	<b>3,442,654</b>	<b>3,442,654</b>	<b>3,323,737 kWh</b>		<b>\$268,859</b>		<b>\$308,340</b>
<b>TAM Adj for Other Revs (205)</b>							
1st 3,000 kWh, per kWh	1,866,264	1,866,264	1,804,482 kWh	0.022 ¢	\$397	0.000 ¢	\$0
All additional kWh, per kWh	1,576,390	1,576,390	1,519,255 kWh	0.017 ¢	\$258	0.000 ¢	\$0
<b>Subtotal</b>					<b>\$269,514</b>		<b>\$308,340</b>
<b>Schedule 201</b>							
1st 3,000 kWh, per kWh	1,866,264	1,866,264	1,804,482 kWh	2.130 ¢	\$38,435	2.130 ¢	\$38,435
All additional kWh, per kWh	1,576,390	1,576,390	1,519,255 kWh	1.580 ¢	\$24,004	1.580 ¢	\$24,004
<b>Total</b>	<b>3,442,654</b>	<b>3,442,654</b>	<b>3,323,737 kWh</b>		<b>\$331,953</b>	<b>Change</b>	<b>\$370,779</b>
							<b>\$38,826</b>

PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 28/728 - Composite</b>							
<b>Large General Service - (Secondary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW	6,972,158	6,972,158	6,943,054 kW	\$2.20	\$15,274,719	\$2.13	\$14,788,705
<b>System Usage Charge</b>							
Sch 200 related, per kWh	1,993,362,624	1,975,519,401	1,968,466,445 kWh	0.068 ¢	\$1,338,557	0.075 ¢	\$1,476,350
T&A and Sch 201 related, per kWh	1,993,362,624	1,975,519,401	1,968,466,445 kWh	0.079 ¢	\$1,555,088	0.096 ¢	\$1,889,728
<b>Distribution Charge</b>							
<b>Basic Charge</b>							
Load Size ≤ 50 kW, per month	58,555	58,555	59,595 bill	\$19.00	\$1,132,305	\$19.00	\$1,132,305
Load Size 51-100 kW, per month	41,184	41,184	41,899 bill	\$35.00	\$1,466,465	\$35.00	\$1,466,465
Load Size 101-300 kW, per month	22,209	22,209	22,586 bill	\$84.00	\$1,897,224	\$83.00	\$1,874,638
Load Size > 300 kW, per month	621	621	631 bill	\$119.00	\$75,089	\$118.00	\$74,458
<b>Load Size Charge</b>							
≤ 50 kW, per kW	2,232,934	2,232,934	2,227,010 kW	\$1.20	\$2,672,412	\$1.20	\$2,672,412
51-100 kW, per kW	2,892,150	2,892,150	2,879,942 kW	\$0.95	\$2,735,945	\$0.95	\$2,735,945
101-300 kW, per kW	3,353,010	3,353,010	3,336,352 kW	\$0.55	\$1,834,994	\$0.55	\$1,834,994
>300 kW, per kW	259,546	259,546	257,628 kW	\$0.35	\$90,170	\$0.35	\$90,170
Demand Charge, per kW	6,972,158	6,972,158	6,943,054 kW	\$4.03	\$27,980,508	\$3.99	\$27,702,785
Reactive Power Charge, per kvar	657,847	657,847	651,033 kvar	65.00 ¢	\$423,171	65.00 ¢	\$423,171
Distribution Energy Charge, per kWh	1,993,362,624	1,975,519,401	1,968,466,445 kWh	0.411 ¢	\$8,090,397	0.401 ¢	\$7,893,550
<b>Energy Charge - Schedule 200</b>							
All kWh, per kWh	1,993,362,624	1,975,519,401	1,968,466,445 kWh	2.722 ¢	\$53,581,657	2.724 ¢	\$53,621,026
<b>Subtotal</b>	1,993,362,624	1,975,519,401	1,968,466,445 kWh		\$120,148,701		\$119,676,702
TAM Adj for Other Revs (205)							
All kWh, per kWh	1,993,362,624	1,975,519,401	1,968,466,445 kWh	0.022 ¢	\$433,063	0.000 ¢	\$0
<b>Subtotal</b>					\$120,581,764		\$119,676,702
Schedule 201							
All kWh, per kWh	1,993,362,624	1,975,519,401	1,968,466,445 kWh	2.087 ¢	\$41,081,895	2.087 ¢	\$41,081,895
<b>Total</b>	1,993,362,624	1,975,519,401	1,968,466,445 kWh		\$161,663,659		\$160,758,597
						Change	(\$905,062)
<b>Schedule No. 28/728 - Composite</b>							
<b>Large General Service - (Primary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW	104,177	104,177	102,993 kW	\$2.14	\$220,405	\$1.67	\$171,998
<b>System Usage Charge</b>							
Sch 200 related, per kWh	24,061,378	24,061,378	23,804,268 kWh	0.064 ¢	\$15,235	0.073 ¢	\$17,377
T&A and Sch 201 related, per kWh	24,061,378	24,061,378	23,804,268 kWh	0.075 ¢	\$17,853	0.093 ¢	\$22,138
<b>Distribution Charge</b>							
<b>Basic Charge</b>							
Load Size ≤ 50 kW, per month	164	164	167 bill	\$25.00	\$4,175	\$18.00	\$3,006
Load Size 51-100 kW, per month	214	214	217 bill	\$43.00	\$9,331	\$31.00	\$6,727
Load Size 101-300 kW, per month	380	380	385 bill	\$100.00	\$38,500	\$73.00	\$28,105
Load Size > 300 kW, per month	54	54	55 bill	\$143.00	\$7,865	\$105.00	\$5,775
<b>Load Size Charge</b>							
≤ 50 kW, per kW	6,569	6,569	6,511 kW	\$1.40	\$9,115	\$1.00	\$6,511
51-100 kW, per kW	15,968	15,968	15,692 kW	\$1.15	\$18,046	\$0.85	\$13,338
101-300 kW, per kW	66,331	66,331	65,414 kW	\$0.70	\$45,790	\$0.50	\$32,707
>300 kW, per kW	43,318	43,318	42,282 kW	\$0.35	\$14,799	\$0.25	\$10,571
Demand Charge, per kW	104,177	104,177	102,993 kW	\$4.90	\$504,666	\$3.59	\$369,745
Reactive Power Charge, per kvar	11,812	11,812	11,603 kvar	60.00 ¢	\$6,962	60.00 ¢	\$6,962
Distribution Energy Charge, per kWh	24,061,378	24,061,378	23,804,268 kWh	0.069 ¢	\$16,425	0.046 ¢	\$10,950
<b>Energy Charge - Schedule 200</b>							
All kWh, per kWh	24,061,378	24,061,378	23,804,268 kWh	2.696 ¢	\$641,763	2.661 ¢	\$633,432
<b>Subtotal</b>	24,061,378	24,061,378	23,804,268 kWh		\$1,570,930		\$1,339,342
TAM Adj for Other Revs (205)							
All kWh, per kWh	24,061,378	24,061,378	23,804,268 kWh	0.022 ¢	\$5,237	0.000 ¢	\$0
<b>Subtotal</b>					\$1,576,167		\$1,339,342
Schedule 201							
All kWh, per kWh	24,061,378	24,061,378	23,804,268 kWh	2.068 ¢	\$492,272	2.068 ¢	\$492,272
<b>Total</b>	24,061,378	24,061,378	23,804,268 kWh		\$2,068,439		\$1,831,614
						Change	(\$236,825)

PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 30/730 - Composite</b>							
<b>Large General Service - (Secondary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW	3,224,408	3,224,408	3,324,307 kW	\$2.52	\$8,377,254	\$2.52	\$8,377,254
<b>System Usage Charge</b>							
Sch 200 related, per kWh	1,152,976,818	1,142,524,024	1,183,141,965 kWh	0.065 ¢	\$769,042	0.073 ¢	\$863,694
T&A and Sch 201 related, per kWh	1,152,976,818	1,142,524,024	1,183,141,965 kWh	0.076 ¢	\$899,188	0.093 ¢	\$1,100,322
<b>Distribution Charge</b>							
<b>Basic Charge</b>							
Load Size ≤ 200 kW, per month	179	179	176 bill	\$494.00	\$86,944	\$451.00	\$79,376
Load Size 201-300 kW, per month	2,582	2,582	2,539 bill	\$144.00	\$365,616	\$131.00	\$332,609
Load Size > 300 kW, per month	6,313	6,313	6,205 bill	\$380.00	\$2,357,900	\$346.00	\$2,146,930
<b>Load Size Charge</b>							
≤ 200 Kw, per kW				No Charge	\$0	No Charge	\$0
201-300 kW, per kW	669,986	669,986	692,354 kW	\$1.75	\$1,211,620	\$1.60	\$1,107,766
>300 kW, per kW	3,133,877	3,133,877	3,233,216 kW	\$0.85	\$2,748,234	\$0.75	\$2,424,912
Demand Charge, per kW	3,224,408	3,224,408	3,324,307 kW	\$4.17	\$13,862,360	\$3.80	\$12,632,367
Reactive Power Charge, per kvar	581,094	581,094	587,792 kvar	65.00 ¢	\$382,065	65.00 ¢	\$382,065
<b>Energy Charge - Schedule 200</b>							
Demand Charge, per kW	3,224,408	3,224,408	3,324,307 kW	\$3.41	\$11,335,887	\$5.80	\$19,280,981
All kWh, per kWh	1,152,976,818	1,142,524,024	1,183,141,965 kWh	1.710 ¢	\$20,231,728	1.043 ¢	\$12,340,171
<b>Subtotal</b>	1,152,976,818	1,142,524,024	1,183,141,965 kWh		\$62,627,838		\$61,068,447
<b>TAM Adj for Other Revs (205)</b>							
All kWh, per kWh	1,152,976,818	1,142,524,024	1,183,141,965 kWh	0.021 ¢	\$248,460	0.000 ¢	\$0
<b>Subtotal</b>					\$62,876,298		\$61,068,447
<b>Schedule 201</b>							
All kWh, per kWh	1,152,976,818	1,142,524,024	1,183,141,965 kWh	2.036 ¢	\$24,088,770	2.036 ¢	\$24,088,770
<b>Total</b>	1,152,976,818	1,142,524,024	1,183,141,965 kWh		\$86,965,068	Change	\$85,157,217 (\$1,807,851)
<b>Schedule No. 30/730 - Composite</b>							
<b>Large General Service - (Primary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW	273,083	273,083	280,081 kW	\$2.50	\$700,203	\$2.54	\$711,406
<b>System Usage Charge</b>							
Sch 200 related, per kWh	95,500,340	95,500,340	98,439,365 kWh	0.064 ¢	\$63,001	0.073 ¢	\$71,861
T&A and Sch 201 related, per kWh	95,500,340	95,500,340	98,439,365 kWh	0.076 ¢	\$74,814	0.093 ¢	\$91,549
<b>Distribution Charge</b>							
<b>Basic Charge</b>							
Load Size ≤ 200 kW, per month	0	0	0 bill	\$481.00	\$0	\$424.00	\$0.00
Load Size 201-300 kW, per month	95	95	93 bill	\$151.00	\$14,043	\$134.00	\$12,462.00
Load Size > 300 kW, per month	546	546	538 bill	\$393.00	\$211,434	\$350.00	\$188,300.00
<b>Load Size Charge</b>							
≤ 200 Kw, per kW				No Charge	\$0	No Charge	\$0
201-300 kW, per kW	25,038	25,038	26,123 kW	\$1.65	\$43,103	\$1.45	\$37,878
>300 kW, per kW	312,218	312,218	320,601 kW	\$0.80	\$256,481	\$0.70	\$224,421
Demand Charge, per kW	273,083	273,083	280,081 kW	\$4.17	\$1,167,938	\$3.71	\$1,039,101
Reactive Power Charge, per kvar	38,218	38,218	37,437 kvar	60.00 ¢	\$22,462	60.00 ¢	\$22,462
<b>Energy Charge - Schedule 200</b>							
Demand Charge, per kW	273,083	273,083	280,081 kW	\$3.41	\$955,076	\$5.80	\$1,624,470
All kWh, per kWh	95,500,340	95,500,340	98,439,365 kWh	1.692 ¢	\$1,665,594	1.014 ¢	\$998,175
<b>Subtotal</b>	95,500,340	95,500,340	98,439,365 kWh		\$5,174,149		\$5,022,085
<b>TAM Adj for Other Revs (205)</b>							
All kWh, per kWh	95,500,340	95,500,340	98,439,365 kWh	0.022 ¢	\$21,657	0.000 ¢	\$0
<b>Subtotal</b>					\$5,195,806		\$5,022,085
<b>Schedule 201</b>							
All kWh, per kWh	95,500,340	95,500,340	98,439,365 kWh	2.068 ¢	\$2,035,726	2.068 ¢	\$2,035,726
<b>Total</b>	95,500,340	95,500,340	98,439,365 kWh		\$7,231,532	Change	\$7,057,811 (\$173,721)

PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 41/741 - Irrigation</b>							
<b>Agricultural Pumping Service (Secondary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	237,425,712	224,330,512	234,939,400 kWh	0.643 ¢	\$1,510,660	0.675 ¢	\$1,585,841
<b>System Usage Charge</b>							
Sch 200 related, per kWh	237,425,712	224,330,512	234,939,400 kWh	0.057 ¢	\$133,915	0.091 ¢	\$213,795
T&A and Sch 201 related, per kWh	237,425,712	224,330,512	234,939,400 kWh	0.089 ¢	\$209,096	0.072 ¢	\$169,156
<b>Distribution Charge</b>							
Basic Charge (billed in November)							
Load Size ≤ 50 kW, or Single Phase Any Size	5,576	5,576	5,586 bill	No Charge	\$0	No Charge	\$0
Three Phase Load Size 51 - 300 kW, per customer	974	974	976 bill	\$360.00	\$351,360	\$420.00	\$409,920
Three Phase Load Size > 300 kW, per customer	19	19	19 bill	\$1,420.00	\$26,980	\$1,650.00	\$31,350
Total Annual Bills	6,569	6,569	6,581				
Average Customers	7,981	7,981	7,995				
Monthly Bills	42,934	42,934	43,009				
Load Size Charge (billed in November)							
Single Phase Any Size, Three Phase ≤ 50 kW	94,969	94,969	99,460 kW	\$17.10	\$1,700,766	\$17.10	\$1,700,766
Three Phase Load Size 51-300 kW, per kW	86,214	86,214	90,291 kW	\$11.70	\$1,056,405	\$11.70	\$1,056,405
Three Phase Load Size > 300 kW, per kW	8,433	8,433	8,832 kW	\$7.20	\$63,590	\$7.20	\$63,590
Single Phase, Minimum Charge	377	377	378 bill	\$65.00	\$24,570	\$75.00	\$28,350
Three Phase, Minimum Charge	1,457	1,457	1,460 bill	\$105.00	\$153,300	\$120.00	\$175,200
Distribution Energy Charge, per kWh	237,425,712	224,330,512	234,939,400 kWh	4.197 ¢	\$9,860,407	5.087 ¢	\$11,951,367
Reactive Power Charge, per kvar	211,414	211,414	221,412 kvar	65.00 ¢	\$143,918	65.00 ¢	\$143,918
<b>Energy Charge - Schedule 200</b>							
All kWh, per kWh	237,425,712	224,330,512	234,939,400 kWh	2.577 ¢	\$6,054,388	2.631 ¢	\$6,181,256
<b>Subtotal</b>	237,425,712	224,330,512	234,939,400 kWh		\$21,289,355		\$23,710,914
TAM Adj for Other Revs (205)	237,425,712	224,330,512	234,939,400 kWh	0.021 ¢	\$49,337	0.000 ¢	\$0
<b>Subtotal</b>					\$21,338,692		\$23,710,914
Schedule 201							
All kWh, per kWh	237,425,712	224,330,512	234,939,400 kWh	1.974 ¢	\$4,637,704	1.974 ¢	\$4,637,704
Option A Summer On Peak Adder, per On-peak kWh	19,903,136	18,805,380	19,694,711 kWh	4.989 ¢	\$982,569	4.989 ¢	\$982,569
Option B Summer On Peak Adder, per On-peak kWh	19,465,341	18,391,732	19,261,501 kWh	4.989 ¢	\$960,956	4.989 ¢	\$960,956
Summer Off Peak Adder, per Off-peak kWh	198,057,235	187,133,400	195,983,188 kWh	-0.992 ¢	(\$1,944,153)	-0.992 ¢	(\$1,944,153)
<b>Total</b>	237,425,712	224,330,512	234,939,400 kWh		\$25,976,396		\$28,348,618
						Change	\$2,372,222
<b>Schedule No. 41/741 - Irrigation</b>							
<b>Agricultural Pumping Service (Primary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	32,387	32,387	33,919 kWh	0.633 ¢	\$215	0.665 ¢	\$226
<b>System Usage Charge</b>							
Sch 200 related, per kWh	32,387	32,387	33,919 kWh	0.056 ¢	\$19	0.090 ¢	\$31
T&A and Sch 201 related, per kWh	32,387	32,387	33,919 kWh	0.088 ¢	\$30	0.071 ¢	\$24
<b>Distribution Charge</b>							
Basic Charge (billed in November)							
Load Size ≤ 50 kW, or Single Phase Any Size	2	2	2 bill	No Charge	\$0	No Charge	\$0
Three Phase Load Size 51 - 300 kW, per customer	1	1	1 bill	\$360.00	\$360	\$410.00	\$410
Three Phase Load Size > 300 kW, per customer	0	0	0 bill	\$1,400.00	\$0	\$1,630.00	\$0
Total Annual Bills	3	3	3				
Average Customers	4	4	4				
Monthly Bills	24	24	24				
Load Size Charge (billed in November)							
Single Phase Any Size, Three Phase ≤ 50 kW	12	12	13 kW	\$16.90	\$220	\$16.90	\$220
Three Phase Load Size 51-300 kW, per kW	72	72	75 kW	\$11.50	\$863	\$11.50	\$863
Three Phase Load Size > 300 kW, per kW	0	0	0 kW	\$7.10	\$0	\$7.10	\$0
Single Phase, Minimum Charge	0	0	0 bill	\$65.00	\$0	\$75.00	\$0
Three Phase, Minimum Charge	0	0	0 bill	\$105.00	\$0	\$120.00	\$0
Distribution Energy Charge, per kWh	32,387	32,387	33,919 kWh	4.132 ¢	\$1,402	5.008 ¢	\$1,699
Reactive Power Charge, per kvar	81	81	85 kvar	60.00 ¢	\$51	60.00 ¢	\$51
<b>Energy Charge - Schedule 200</b>							
All kWh, per kWh	32,387	32,387	33,919 kWh	2.537 ¢	\$861	2.590 ¢	\$879
<b>Subtotal</b>	32,387	32,387	33,919 kWh		\$4,021		\$4,403
TAM Adj for Other Revs (205)	32,387	32,387	33,919 kWh	0.020 ¢	\$7	0.000 ¢	\$0
<b>Subtotal</b>					\$4,028		\$4,403
Schedule 201							
All kWh, per kWh	32,387	32,387	33,919 kWh	1.943 ¢	\$659	1.943 ¢	\$659
Option A Summer On Peak Adder, per On-peak kWh	2,715	2,715	2,843 kWh	4.989 ¢	\$142	4.989 ¢	\$142
Option B Summer On Peak Adder, per On-peak kWh	2,655	2,655	2,781 kWh	4.989 ¢	\$139	4.989 ¢	\$139
Summer Off Peak Adder, per Off-peak kWh	27,017	27,017	28,295 kWh	-0.992 ¢	(\$281)	-0.992 ¢	(\$281)
<b>Total</b>	32,387	32,387	33,919 kWh		\$4,687		\$5,062
						Change	\$375

PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 47747 - Composite</b>							
<b>Large General Service - Partial Requirement (Primary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW of on-peak demand	85,374	85,374	87,270 kW	\$2.45	\$213,812	\$2.45	\$213,812
credit per kW of on-peak demand (OATT)	0	0	0 kW	(\$2.45)	\$0	(\$2.45)	\$0
<b>System Usage Charge</b>							
Sch 200 related, per kWh	14,646,249	14,646,249	14,971,570 kWh	0.059 ¢	\$8,833	0.070 ¢	\$10,480
T&A and Sch 201 related, per kWh	14,646,249	14,646,249	14,971,570 kWh	0.068 ¢	\$10,181	0.088 ¢	\$13,175
<b>Distribution Charge</b>							
Basic Charge							
Facility Capacity < 4,000 kW, per month	0	0	0 bill	\$550.00	\$0	\$550.00	\$0
Facility Capacity > 4,000 kW, per month	12	12	12 bill	\$1,490.00	\$17,880	\$1,510.00	\$18,120
Facilities Charge							
Facility Capacity < 4,000 kW, per kW	0	0	0 kW	\$1.30	\$0	\$1.30	\$0
Facility Capacity > 4,000 kW, per kW	119,806	119,806	122,467 kW	\$0.85	\$104,097	\$0.85	\$104,097
Demand Charge, per kW of on-peak demand	85,374	85,374	87,270 kW	\$4.33	\$377,879	\$3.65	\$318,536
Reactive Power Charge, per kvar	5,446	5,446	5,567 kvar	60.00 ¢	\$3,340	60.00 ¢	\$3,340
Reactive Hours, per kvarh	12,609,400	12,609,400	12,889,479 kvarh	0.080 ¢	\$10,312	0.080 ¢	\$10,312
Reserves Charges							
Spinning Reserves, per kW of Facility Cap.	119,806	119,806	122,467 kW	\$0.27	\$33,066	\$0.27	\$33,066
Supplemental Reserves, per kW of Facility Cap.	119,806	119,806	122,467 kW	\$0.27	\$33,066	\$0.27	\$33,066
Spinning Reserves Credit, per kW of Facility Cap.	0	0	0 kW	(\$0.27)	\$0	(\$0.27)	\$0
Supplemental Reserves Credit, per kW of Facility Cap.	0	0	0 kW	(\$0.27)	\$0	(\$0.27)	\$0
<b>Energy Charge - Schedule 200</b>							
Demand Charge, per kW of On-Peak demand	85,374	85,374	87,270 kW	\$1.71	\$149,232	\$1.72	\$150,104
On-Peak, per on-peak kWh	6,118,478	6,118,478	6,254,381 kWh	2.179 ¢	\$136,283	2.188 ¢	\$136,846
Off-Peak, per off-peak kWh	8,527,771	8,527,771	8,717,189 kWh	2.179 ¢	\$189,948	2.188 ¢	\$190,732
<b>Unscheduled Energy, per kWh</b>	<b>452,751</b>	<b>452,751</b>	<b>462,808 kWh</b>		<b>\$20,584</b>		<b>\$20,584</b>
<b>Subtotal</b>	<b>15,099,000</b>	<b>15,099,000</b>	<b>15,434,378 kWh</b>		<b>\$1,308,513</b>		<b>\$1,256,270</b>
TAM Adj for Other Revs (205)							
On-Peak, per on-peak kWh	6,118,478	6,118,478	6,254,381 kWh	0.025 ¢	\$1,564	0.000 ¢	\$0
Off-Peak, per off-peak kWh	8,527,771	8,527,771	8,717,189 kWh	0.018 ¢	\$1,569	0.000 ¢	\$0
<b>Subtotal</b>					<b>\$1,311,646</b>		<b>\$1,256,270</b>
Schedule 201							
On-Peak, per on-peak kWh	6,118,478	6,118,478	6,254,381 kWh	2.374 ¢	\$148,479	2.374 ¢	\$148,479
Off-Peak, per off-peak kWh	8,527,771	8,527,771	8,717,189 kWh	1.686 ¢	\$146,972	1.686 ¢	\$146,972
<b>Total</b>	<b>15,099,000</b>	<b>15,099,000</b>	<b>15,434,378 kWh</b>		<b>\$1,607,097</b>	<b>Change</b>	<b>(\$55,376)</b>
<b>Schedule No. 47747 - Composite</b>							
<b>Large General Service - Partial Requirement (Transmission)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW of on-peak demand	138,992	138,992	135,695 kW	\$3.25	\$441,009	\$3.10	\$420,655
credit per kW of on-peak demand (OATT)	0	0	0 kW	(\$3.25)	\$0	(\$3.10)	\$0
<b>System Usage Charge</b>							
Sch 200 related, per kWh	12,828,129	12,828,129	12,903,938 kWh	0.058 ¢	\$7,484	0.067 ¢	\$8,646
T&A and Sch 201 related, per kWh	12,828,129	12,828,129	12,903,938 kWh	0.066 ¢	\$8,517	0.083 ¢	\$10,710
<b>Distribution Charge</b>							
Basic Charge							
Facility Capacity < 4,000 kW, per month	24	24	24 bill	\$710.00	\$17,040	\$710.00	\$17,040
Facility Capacity > 4,000 kW, per month	36	36	36 bill	\$1,820.00	\$65,520	\$1,820.00	\$65,520
Facilities Charge							
Facility Capacity < 4,000 kW, per kW	28,166	28,166	28,792 kW	\$1.25	\$35,990	\$1.25	\$35,990
Facility Capacity > 4,000 kW, per kW	311,273	311,273	298,765 kW	\$1.05	\$313,703	\$1.05	\$313,703
Demand Charge, per kW of on-peak demand	138,992	138,992	135,695 kW	\$3.03	\$411,156	\$2.05	\$278,175
Reactive Power Charge, per kvar	144,234	144,234	137,544 kvar	55.00 ¢	\$75,649	55.00 ¢	\$75,649
Reactive Hours, per kvarh	48,770,928	48,770,928	45,614,133 kvarh	0.080 ¢	\$36,491	0.080 ¢	\$36,491
Reserves Charges							
Spinning Reserves, per kW of Facility Cap.	339,439	339,439	327,557 kW	\$0.27	\$88,440	\$0.27	\$88,440
Supplemental Reserves, per kW of Facility Cap.	339,439	339,439	327,557 kW	\$0.27	\$88,440	\$0.27	\$88,440
Spinning Reserves Credit, per kW of Facility Cap.	0	0	0 kW	(\$0.27)	\$0	(\$0.27)	\$0
Supplemental Reserves Credit, per kW of Facility Cap.	0	0	0 kW	(\$0.27)	\$0	(\$0.27)	\$0
<b>Energy Charge - Schedule 200</b>							
Demand Charge, per kW of On-Peak demand	138,992	138,992	135,695 kW	\$1.72	\$233,395	\$1.75	\$237,466
On-Peak, per on-peak kWh	4,632,668	4,632,668	4,661,426 kWh	2.129 ¢	\$99,242	2.166 ¢	\$100,966
Off-Peak, per off-peak kWh	8,195,461	8,195,461	8,242,512 kWh	2.129 ¢	\$175,483	2.166 ¢	\$178,533
<b>Unscheduled Energy, per kWh</b>	<b>808,775</b>	<b>808,775</b>	<b>770,332 kWh</b>		<b>\$31,982</b>		<b>\$31,982</b>
<b>Subtotal</b>	<b>13,636,904</b>	<b>13,636,904</b>	<b>13,674,270 kWh</b>		<b>\$2,129,541</b>		<b>\$1,988,406</b>
TAM Adj for Other Revs (205)							
On-Peak, per on-peak kWh	4,632,668	4,632,668	4,661,426 kWh	0.024 ¢	\$1,119	0.000 ¢	\$0
Off-Peak, per off-peak kWh	8,195,461	8,195,461	8,242,512 kWh	0.016 ¢	\$1,319	0.000 ¢	\$0
<b>Subtotal</b>					<b>\$2,131,979</b>		<b>\$1,988,406</b>
Schedule 201							
On-Peak, per on-peak kWh	4,632,668	4,632,668	4,661,426 kWh	2.259 ¢	\$105,302	2.259 ¢	\$105,302
Off-Peak, per off-peak kWh	8,195,461	8,195,461	8,242,512 kWh	1.571 ¢	\$129,490	1.571 ¢	\$129,490
<b>Total</b>	<b>13,636,904</b>	<b>13,636,904</b>	<b>13,674,270 kWh</b>		<b>\$2,366,771</b>	<b>Change</b>	<b>(\$143,573)</b>

PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 76R/776R</b>							
<b>Large General Service/Partial Requirements Service - Economic Replacement Power Rider</b>							
Transmission & Ancillary Services Charge, per kW of Daily ERP On-Peak Demand							
Secondary	0	0	0 kW	\$0.087	\$0	\$0.087	\$0
Primary	0	0	0 kW	\$0.095	\$0	\$0.095	\$0
Transmission	0	0	0 kW	\$0.127	\$0	\$0.121	\$0
Daily ERP Demand Charge, per kW of Daily ERP On-Peak Demand							
Secondary	0	0	0 kW	\$0.161	\$0	\$0.134	\$0
Primary	0	0	0 kW	\$0.169	\$0	\$0.142	\$0
Transmission	0	0	0 kW	\$0.118	\$0	\$0.080	\$0
<b>Schedule No. 48/748 - Composite</b>							
<b>Large General Service (Secondary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW of on-peak demand	1,310,991	1,310,991	1,394,562 kW	\$2.78	\$3,876,882	\$2.78	\$3,876,882
<b>System Usage Charge</b>							
Sch 200 related, per kWh	542,038,800	524,746,272	560,925,960 kWh	0.060 ¢	\$336,556	0.073 ¢	\$409,476
T&A and Sch 201 related, per kWh	542,038,800	524,746,272	560,925,960 kWh	0.070 ¢	\$392,648	0.092 ¢	\$516,052
<b>Distribution Charge</b>							
Basic Charge							
Facility Capacity ≤ 4,000 kW, per month	1,111	1,111	1,109 bill	\$580.00	\$643,220	\$560.00	\$621,040
Facility Capacity > 4,000 kW, per month	12	12	13 bill	\$1,600.00	\$20,800	\$1,540.00	\$20,020
Facilities Charge							
Facility Capacity ≤ 4,000 kW, per kW	1,461,164	1,461,164	1,521,792 kW	\$2.70	\$4,108,838	\$2.95	\$4,489,286
Facility Capacity > 4,000 kW, per kW	154,726	154,726	245,208 kW	\$0.80	\$196,166	\$1.70	\$416,854
Demand Charge, per kW of on-peak demand	1,310,991	1,310,991	1,394,562 kW	\$4.14	\$5,773,487	\$3.45	\$4,811,239
Reactive Power Charge, per kvar	331,372	331,372	332,557 kvar	65.00 ¢	\$216,162	65.00 ¢	\$216,162
<b>Energy Charge - Schedule 200</b>							
Demand Charge, per kW of On-Peak demand	1,310,991	1,310,991	1,394,562 kW	\$1.64	\$2,287,082	\$1.64	\$2,287,082
On-Peak, per on-peak kWh	206,565,779	199,974,779	213,761,828 kWh	2.244 ¢	\$4,796,815	2.242 ¢	\$4,792,540
Off-Peak, per off-peak kWh	335,473,021	324,771,493	347,164,132 kWh	2.244 ¢	\$7,790,363	2.242 ¢	\$7,783,420
<b>Subtotal</b>	<b>542,038,800</b>	<b>524,746,272</b>	<b>560,925,960 kWh</b>		<b>\$30,439,019</b>		<b>\$30,240,053</b>
TAM Adj for Other Revs (205)							
On-Peak, per on-peak kWh	206,565,779	199,974,779	213,761,828 kWh	0.026 ¢	\$55,578	0.000 ¢	\$0
Off-Peak, per off-peak kWh	335,473,021	324,771,493	347,164,132 kWh	0.019 ¢	\$65,961	0.000 ¢	\$0
<b>Subtotal</b>					<b>\$30,560,558</b>		<b>\$30,240,053</b>
Schedule 201							
On-Peak, per on-peak kWh	206,565,779	199,974,779	213,761,828 kWh	2.461 ¢	\$5,260,679	2.461 ¢	\$5,260,679
Off-Peak, per off-peak kWh	335,473,021	324,771,493	347,164,132 kWh	1.774 ¢	\$6,158,692	1.774 ¢	\$6,158,692
<b>Total</b>	<b>542,038,800</b>	<b>524,746,272</b>	<b>560,925,960 kWh</b>		<b>\$41,979,929</b>	<b>Change</b>	<b>(\$320,505)</b>
<b>Schedule No. 48/748 - Composite</b>							
<b>Large General Service (Primary)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW of on-peak demand	3,170,854	3,170,854	3,148,200 kW	\$2.99	\$9,413,118	\$2.99	\$9,413,118
<b>System Usage Charge</b>							
Sch 200 related, per kWh	1,493,674,734	1,493,674,734	1,477,893,837 kWh	0.059 ¢	\$871,957	0.070 ¢	\$1,034,526
T&A and Sch 201 related, per kWh	1,493,674,734	1,493,674,734	1,477,893,837 kWh	0.068 ¢	\$1,004,968	0.088 ¢	\$1,300,547
<b>Distribution Charge</b>							
Basic Charge							
Facility Capacity ≤ 4,000 kW, per month	744	744	743 bill	\$550.00	\$408,650	\$550.00	\$408,650
Facility Capacity > 4,000 kW, per month	329	329	327 bill	\$1,490.00	\$487,230	\$1,510.00	\$493,770
Facilities Charge							
Facility Capacity ≤ 4,000 kW, per kW	1,478,553	1,478,553	1,551,718 kW	\$1.30	\$2,017,233	\$1.30	\$2,017,233
Facility Capacity > 4,000 kW, per kW	2,445,708	2,445,708	2,400,601 kW	\$0.85	\$2,040,511	\$0.85	\$2,040,511
Demand Charge, per kW of on-peak demand	3,170,854	3,170,854	3,148,200 kW	\$4.33	\$13,631,706	\$3.65	\$11,490,930
Reactive Power Charge, per kvar	757,050	757,050	727,257 kvar	60.00 ¢	\$436,354	60.00 ¢	\$436,354
<b>Energy Charge - Schedule 200</b>							
Demand Charge, per kW of On-Peak demand	3,170,854	3,170,854	3,148,200 kW	\$1.71	\$5,383,422	\$1.72	\$5,414,904
On-Peak, per on-peak kWh	565,736,213	565,736,213	559,759,125 kWh	2.179 ¢	\$12,197,151	2.188 ¢	\$12,247,530
Off-Peak, per off-peak kWh	927,938,521	927,938,521	918,134,712 kWh	2.179 ¢	\$20,006,155	2.188 ¢	\$20,088,787
<b>Subtotal</b>	<b>1,493,674,734</b>	<b>1,493,674,734</b>	<b>1,477,893,837 kWh</b>		<b>\$67,898,455</b>		<b>\$66,386,860</b>
TAM Adj for Other Revs (205)							
On-Peak, per on-peak kWh	565,736,213	565,736,213	559,759,125 kWh	0.025 ¢	\$139,940	0.000 ¢	\$0
Off-Peak, per off-peak kWh	927,938,521	927,938,521	918,134,712 kWh	0.018 ¢	\$165,264	0.000 ¢	\$0
<b>Subtotal</b>					<b>\$68,203,659</b>		<b>\$66,386,860</b>
Schedule 201							
On-Peak, per on-peak kWh	565,736,213	565,736,213	559,759,125 kWh	2.374 ¢	\$13,288,682	2.374 ¢	\$13,288,682
Off-Peak, per off-peak kWh	927,938,521	927,938,521	918,134,712 kWh	1.686 ¢	\$15,479,751	1.686 ¢	\$15,479,751
<b>Total</b>	<b>1,493,674,734</b>	<b>1,493,674,734</b>	<b>1,477,893,837 kWh</b>		<b>\$96,972,092</b>	<b>Change</b>	<b>(\$95,155,293)</b> <b>(\$1,816,799)</b>



PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 48/748 - Composite</b>							
<b>Large General Service (Transmission)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW of on-peak demand	1,426,735	1,426,735	2,477,112 kW	\$3.79	\$9,388,254	\$3.64	\$9,016,688
<b>System Usage Charge</b>							
Sch 200 related, per kWh	837,259,000	837,259,000	1,545,235,788 kWh	0.058 ¢	\$896,237	0.067 ¢	\$1,035,308
T&A and Sch 201 related, per kWh	837,259,000	837,259,000	1,545,235,788 kWh	0.066 ¢	\$1,019,856	0.083 ¢	\$1,282,546
<b>Distribution Charge</b>							
Basic Charge							
Facility Capacity ≤ 4,000 kW, per month	49	49	49 bill	\$710.00	\$34,790	\$710.00	\$34,790
Facility Capacity > 4,000 kW, per month	45	45	45 bill	\$1,820.00	\$81,900	\$1,820.00	\$81,900
Facilities Charge							
Facility Capacity ≤ 4,000 kW, per kW	45,876	45,876	50,938 kW	\$1.25	\$63,673	\$1.25	\$63,673
Facility Capacity > 4,000 kW, per kW	1,488,481	1,488,481	2,540,444 kW	\$1.05	\$2,667,466	\$1.05	\$2,667,466
Demand Charge, per kW of on-peak demand	1,426,735	1,426,735	2,477,112 kW	\$3.03	\$7,505,649	\$2.05	\$5,078,080
Reactive Power Charge, per kvar	17,440	17,440	18,385 kvar	55.00 ¢	\$10,112	55.00 ¢	\$10,112
<b>Energy Charge - Schedule 200</b>							
Demand Charge, per kW of On-Peak demand	1,426,735	1,426,735	2,477,112 kW	\$1.72	\$4,260,633	\$1.75	\$4,334,946
On-Peak, per on-peak kWh	314,998,786	314,998,786	581,207,821 kWh	2.129 ¢	\$12,373,915	2.166 ¢	\$12,588,961
Off-Peak, per off-peak kWh	522,260,214	522,260,214	964,027,967 kWh	2.129 ¢	\$20,524,155	2.166 ¢	\$20,880,846
<b>Subtotal</b>	837,259,000	837,259,000	1,545,235,788 kWh		\$58,826,640		\$57,075,316
TAM Adj for Other Revs (205)							
On-Peak, per on-peak kWh	314,998,786	314,998,786	581,207,821 kWh	0.024 ¢	\$139,490	0.000 ¢	\$0
Off-Peak, per off-peak kWh	522,260,214	522,260,214	964,027,967 kWh	0.016 ¢	\$154,244	0.000 ¢	\$0
<b>Subtotal</b>					\$59,120,374		\$57,075,316
Schedule 201							
On-Peak, per on-peak kWh	314,998,786	314,998,786	581,207,821 kWh	2.259 ¢	\$13,129,485	2.259 ¢	\$13,129,485
Off-Peak, per off-peak kWh	522,260,214	522,260,214	964,027,967 kWh	1.571 ¢	\$15,144,879	1.571 ¢	\$15,144,879
<b>Total</b>	837,259,000	837,259,000	1,545,235,788 kWh		\$87,394,738		\$85,349,680
						Change	(\$2,045,058)
<b>Schedule No. 848 - Commercial</b>							
<b>Distribution Only Large General Service (Transmission)</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kW of on-peak demand							
<b>System Usage Charge</b>							
Sch 200 related, per kWh							
T&A and Sch 201 related, per kWh							
<b>Distribution Charge</b>							
Basic Charge							
Facility Capacity ≤ 4,000 kW, per month	0	0	0 bill	\$710.00	\$0	\$710.00	\$0
Facility Capacity > 4,000 kW, per month	12	12	12 bill	\$1,820.00	\$21,840	\$1,820.00	\$21,840
Facilities Charge							
Facility Capacity ≤ 4,000 kW, per kW	0	0	0 kW	\$1.25	\$0	\$1.25	\$0
Facility Capacity > 4,000 kW, per kW	404,276	404,276	440,285 kW	\$1.05	\$462,299	\$1.05	\$462,299
Demand Charge, per kW of on-peak demand	400,368	400,368	436,029 kW	\$3.03	\$1,321,168	\$2.05	\$893,859
Reactive Power Charge, per kvar	0	0	0 kvar	55.00 ¢	\$0	55.00 ¢	\$0
<b>Energy Charge - Schedule 200</b>							
Demand Charge, per kW of On-Peak demand							
On-Peak, per on-peak kWh							
Off-Peak, per off-peak kWh							
<b>Subtotal</b>					\$1,805,307		\$1,377,998
TAM Adj for Other Revs (205)							
On-Peak, per on-peak kWh							
Off-Peak, per off-peak kWh							
<b>Subtotal</b>					\$1,805,307		\$1,377,998
Schedule 201							
On-Peak, per on-peak kWh							
Off-Peak, per off-peak kWh							
<b>Total</b>					\$1,805,307		\$1,377,998
Energy Delivered	274,597,000	274,597,000	286,470,860			Change	(\$427,309)

PACIFIC POWER  
State of Oregon  
Billing Determinants  
Actual 12 Months Ended June 30, 2021  
Forecast 12 Months Ended December 31, 2023

Schedule	Actual	Normalized	Forecast	Present		Proposed	
	7/20-6/21 Units	7/20-6/21 Units	1/23 - 12/23 Units	Price	Dollars	Price	Dollars
<b>Schedule No. 15 - Composite</b>							
<b>Outdoor Area Lighting Service</b>							
No. of Customers	6,066	6,066	5,809				
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	8,475.916	8,475.916	8,259.954 kWh	0.079 ¢	\$6,511	0.056 ¢	\$4,621
<b>System Usage Charge</b>							
Sch 200 related, per kWh	8,475.916	8,475.916	8,259.954 kWh	0.031 ¢	\$2,544	0.028 ¢	\$2,290
T&A and Sch 201 related, per kWh	8,475.916	8,475.916	8,259.954 kWh	0.029 ¢	\$2,426	0.028 ¢	\$2,290
<b>Distribution Charge</b>							
Distribution Charge, per kWh	8,475.916	8,475.916	8,259.954 kWh	8.954 ¢	\$737,460	7.805 ¢	\$644,702
<b>Energy Charge - Schedule 200</b>							
per kWh	8,475.916	8,475.916	8,259.954 kWh	1.159 ¢	\$95,635	0.972 ¢	\$80,322
<b>Subtotal</b>	8,475.916	8,475.916	8,259.954 kWh		\$844,575		\$734,224
TAM Adj for Other Revs (205), per kWh	8,475.916	8,475.916	8,259.954 kWh	0.009 ¢	\$743	0.000 ¢	\$0
<b>Subtotal</b>					\$845,318		\$734,224
Schedule 201							
per kWh	8,475.916	8,475.916	8,259.954 kWh	0.845 ¢	\$69,726	0.844 ¢	\$69,726
<b>Total</b>	8,475.916	8,475.916	8,259.954 kWh		\$915,044	Change	(\$111,094)
<b>Schedule No. 51/751</b>							
<b>Street Lighting Service, Company-Owned System</b>							
No. of Customers	1,105	1,105	1,108				
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	24,436.047	24,436.047	23,892.579 kWh	0.114 ¢	\$27,123	0.078 ¢	\$18,665
<b>System Usage Charge</b>							
Sch 200 related, per kWh	24,436.047	24,436.047	23,892.579 kWh	0.044 ¢	\$10,598	0.040 ¢	\$9,522
T&A and Sch 201 related, per kWh	24,436.047	24,436.047	23,892.579 kWh	0.042 ¢	\$10,105	0.043 ¢	\$10,279
<b>Distribution Charge</b>							
Distribution Charge, per kWh	24,436.047	24,436.047	23,892.579 kWh	11.768 ¢	\$2,811,694	10.420 ¢	\$2,489,717
<b>Energy Charge - Schedule 200</b>							
per kWh	24,436.047	24,436.047	23,892.579 kWh	1.674 ¢	\$399,987	1.303 ¢	\$311,246
<b>Subtotal</b>	24,436.047	24,436.047	23,892.579 kWh		\$3,259,506		\$2,839,428
TAM Adj for Other Revs (205), per kWh	24,436.047	24,436.047	23,892.579 kWh	0.009 ¢	\$2,150	0.000 ¢	\$0
<b>Subtotal</b>					\$3,261,656		\$2,839,428
Schedule 201							
per kWh	24,436.047	24,436.047	23,892.579 kWh	0.987 ¢	\$235,901	0.987 ¢	\$235,901
<b>Total</b>	0	0	23,892,579 kWh		\$3,497,558	Change	(\$422,228)
<b>Schedule No. 53/753</b>							
<b>Street Lighting Service, Consumer-Owned System</b>							
No. of Customers	310	310	314				
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	10,736.096	10,736.096	11,451,780 kWh	0.038 ¢	\$4,352	0.029 ¢	\$3,321
<b>System Usage Charge</b>							
Sch 200 related, per kWh	10,736.096	10,736.096	11,451,780 kWh	0.015 ¢	\$1,718	0.013 ¢	\$1,489
T&A and Sch 201 related, per kWh	10,736.096	10,736.096	11,451,780 kWh	0.014 ¢	\$1,603	0.014 ¢	\$1,603
<b>Distribution Charge</b>							
Distribution Charge, per kWh	10,736.096	10,736.096	11,451,780 kWh	4.274 ¢	\$489,449	3.743 ¢	\$428,640
<b>Energy Charge - Schedule 200</b>							
per kWh	10,736.096	10,736.096	11,451,780 kWh	0.555 ¢	\$63,557	0.467 ¢	\$53,480
<b>Subtotal</b>	10,736.096	10,736.096	11,451,780 kWh		\$560,679		\$488,533
TAM Adj for Other Revs (205), per kWh	10,736.096	10,736.096	11,451,780 kWh	0.009 ¢	\$1,031	0.000 ¢	\$0
<b>Subtotal</b>					\$561,710		\$488,533
Schedule 201							
per kWh	10,736.096	10,736.096	11,451,780 kWh	0.830 ¢	\$95,050	0.830 ¢	\$95,050
<b>Total</b>	10,736.096	10,736.096	11,451,780 kWh		\$656,760	Change	(\$73,177)
<b>Schedule No. 54/754</b>							
<b>Recreational Field Lighting</b>							
<b>Transmission &amp; Ancillary Services Charge</b>							
per kWh	1,310.533	1,310.533	1,141,242 kWh	0.047 ¢	\$536	0.037 ¢	\$422
<b>System Usage Charge</b>							
Sch 200 related, per kWh	1,310.533	1,310.533	1,141,242 kWh	0.019 ¢	\$217	0.017 ¢	\$194
T&A and Sch 201 related, per kWh	1,310.533	1,310.533	1,141,242 kWh	0.018 ¢	\$205	0.018 ¢	\$205
<b>Distribution Charge</b>							
Basic Charge, Single Phase, per month	798	798	795 bill	\$6.00	\$4,770	\$6.00	\$4,770
Basic Charge, Three Phase, per month	431	431	429 bill	\$9.00	\$3,861	\$9.00	\$3,861
Distribution Energy Charge, per kWh	1,310.533	1,310.533	1,141,242 kWh	4.775 ¢	\$54,494	4.069 ¢	\$46,437
<b>Energy Charge - Schedule 200</b>							
per kWh	1,310.533	1,310.533	1,141,242 kWh	0.699 ¢	\$7,977	0.602 ¢	\$6,870
<b>Subtotal</b>	1,310.533	1,310.533	1,141,242 kWh		\$72,060		\$62,759
TAM Adj for Other Revs (205), per kWh	1,310.533	1,310.533	1,141,242 kWh	0.009 ¢	\$103	0.000 ¢	\$0
<b>Subtotal</b>					\$72,163		\$62,759
Schedule 201							
per kWh	1,310.533	1,310.533	1,141,242 kWh	0.830 ¢	\$9,472	0.830 ¢	\$9,472
<b>Total</b>	1,310.533	1,310.533	1,141,242 kWh		\$81,635	Change	(\$9,404)
<b>Subtotal Oregon</b>	13,402,158,727	13,320,114,631	13,937,602,352		\$1,242,687,942		\$1,319,413,831
Employee Discount					(\$340,502)		(\$379,675)
<b>TOTAL OREGON</b>	13,402,158,727	13,320,114,631	13,937,602,352		\$1,242,347,440		\$1,319,034,156
Distribution Only Energy	274,597,000	274,597,000	286,470,800				
Total Energy Including Distribution Only	13,676,755,727	13,594,711,631	14,224,073,212				

Docket No. UE 399  
Exhibit PAC/2106  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith  
Updated Estimated Effect of Proposed Rates and Proposed Adjustment Schedules

July 2022

**PACIFIC POWER**  
**ESTIMATED EFFECT OF PROPOSED PRICE CHANGE**  
**ON REVENUES FROM ELECTRIC SALES TO ULTIMATE CONSUMERS**  
**DISTRIBUTED BY RATE SCHEDULES IN OREGON**  
**FORECAST 12 MONTHS ENDED DECEMBER 31, 2023**

Line No.	Description	Pre Sch No.	Pro Sch No.	No. of Cust	MWh	Present Revenues (\$000)			Proposed Revenues (\$000)			Change			Line No.
						Base Rates	Adders <sup>1</sup>	Net Rates	Base Rates	Adders <sup>1</sup>	Net Rates	Base Rates	% <sup>2</sup>	Net Rates	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
<b>Residential</b>															
1	Residential	4	4	535,059	5,633,856	\$597,063	\$9,738	\$606,801	\$667,125	(\$3,944)	\$663,181	\$70,061	11.7%	\$56,380	9.3%
2	<b>Total Residential</b>			535,059	5,633,856	\$597,063	\$9,738	\$606,801	\$667,125	(\$3,944)	\$663,181	\$70,061	11.7%	\$56,380	9.3%
<b>Commercial &amp; Industrial</b>															
3	Gen. Svc. < 31 kW	23	23	84,329	1,137,011	\$124,438	\$1,015	\$125,453	\$137,278	\$1,251	\$138,529	\$12,840	10.3%	\$13,076	10.4%
4	Gen. Svc. 31 - 200 kW	28	28	10,462	1,992,271	\$163,732	\$9,197	\$172,929	\$162,590	\$10,300	\$172,890	(\$1,142)	-0.7%	(\$39)	0.0%
5	Gen. Svc. 201 - 999 kW	30	30	797	1,281,581	\$94,197	\$4,696	\$98,893	\$92,215	\$6,639	\$98,854	(\$1,982)	-2.1%	(\$39)	0.0%
6	Large General Service ≥ 1,000 kW	48	48	190	3,584,056	\$226,347	(\$15,493)	\$210,854	\$222,164	\$3,692	\$225,856	(\$4,182)	-1.9%	\$15,002	7.0%
7	Partial Req. Svc. ≥ 1,000 kW	47	47	6	29,109	\$3,974	(\$120)	\$3,854	\$3,775	\$30	\$3,805	(\$199)	-1.9%	(\$49)	7.0%
8	Dist. Only Lg. Gen. Svc. ≥ 1,000 kW	848	848	1	0	\$1,805	\$10	\$1,815	\$1,378	\$77	\$1,455	(\$427)	-23.7%	(\$360)	-19.8%
9	Agricultural Pumping Service	41	41	7,998	234,973	\$25,981	(\$3,250)	\$22,731	\$28,354	(\$3,266)	\$25,088	\$2,373	9.1%	\$2,356	10.4%
10	<b>Total Commercial &amp; Industrial</b>			103,783	8,259,000	\$640,474	(\$3,945)	\$636,529	\$647,754	\$18,722	\$666,476	\$7,280	1.1%	\$29,947	4.7%
<b>Lighting</b>															
11	Outdoor Area Lighting Service	15	15	5,809	8,260	\$915	\$74	\$989	\$804	\$186	\$990	(\$111)	-12.1%	\$0	0.0%
12	Street Lighting Service Comp. Owned	51	51	1,108	23,893	\$3,498	\$387	\$3,885	\$3,075	\$809	\$3,885	(\$422)	-12.1%	\$0	0.0%
13	Street Lighting Service Cust. Owned	53	53	314	11,452	\$657	\$210	\$867	\$584	\$283	\$867	(\$73)	-11.1%	\$0	0.0%
14	Recreational Field Lighting	54	54	102	1,141	\$82	\$27	\$108	\$72	\$36	\$108	(\$9)	-11.5%	\$0	0.0%
15	<b>Total Public Street Lighting</b>			7,333	44,746	\$5,151	\$698	\$5,849	\$4,535	\$1,314	\$5,849	(\$616)	-12.0%	\$0	0.0%
16	<b>Subtotal</b>			646,176	13,937,602	\$1,242,688	\$6,491	\$1,249,179	\$1,319,414	\$16,093	\$1,335,507	\$76,726	6.2%	\$86,327	6.9%
17	Employee Discount			966	13,030	(\$341)	(\$6)	(\$346)	(\$380)	\$2	(\$380)	(\$39)		(\$34)	
18	Paperless Credit					(\$2,072)		(\$2,072)	(\$2,072)		(\$2,072)			\$0	
19	COOC Amortization					\$3,521		\$3,521	\$3,521		\$3,521			\$0	
20	<b>Total Sales with AGA</b>			646,176	13,937,602	\$1,245,563	\$6,486	\$1,252,049	\$1,322,250	\$16,095	\$1,338,343	\$76,687	6.2%	\$86,294	6.9%

<sup>1</sup> Excludes effects of the Low Income Bill Payment Assistance Charge (Sch. 91), BPA Credit (Sch. 98), Public Purpose Charge (Sch. 290) and System Benefits Charge (Sch. 291).

<sup>2</sup> Percentages shown for Schedules 48 and 47 reflect the combined rate change for both schedules

**PACIFIC POWER**  
**ESTIMATED REVENUES OF ADJUSTMENT SCHEDULES**  
**FORECAST 12 MONTHS ENDED DECEMBER 31, 2023**

Line No.	Description	Pre Sch No.	Pro Sch No.	OCAT 104 (\$000)	Def Acct Adj 192 (\$000)	Repl Mtr Def Adj 194 (\$000)	Tax Act 195 (\$000)	Deer Cr Def Adj 198 (\$000)	RAC Defer. 203 (\$000)	RAC Defer. 203 PRO	Sol. Inctv. 204 (\$000)	Comm. Sol 207 (\$000)	RMA 299 (\$000)	RMA 299 PRO	Total (\$000)	Total (\$000) PRO
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(16)
<b>Residential</b>																
1	Residential	4	\$3,259	\$2,873	\$1,859	(\$3,549)	\$845	\$282	\$3,042	\$1,746	\$225	\$5,070	(\$10,986)	\$9,738	(\$3,944)	
2	<b>Total Residential</b>		\$3,259	\$2,873	\$1,859	(\$3,549)	\$845	\$282	\$3,042	\$1,746	\$225	\$5,070	(\$10,986)	\$9,738	(\$3,944)	
<b>Commercial &amp; Industrial</b>																
3	Gen. Svc. < 31 kW	23	\$674	\$591	\$387	(\$750)	\$159	\$57	\$580	\$330	\$34	\$125	(\$80)	\$1,015	\$1,251	
4	Gen. Svc. 31 - 200 kW	28	\$929	\$697	\$498	(\$877)	\$279	\$100	\$996	\$598	\$60	\$7,610	\$8,049	\$9,197	\$10,300	
5	Gen. Svc. 201 - 999 kW	30	\$531	\$397	\$295	(\$500)	\$179	\$64	\$628	\$372	\$38	\$3,717	\$5,229	\$4,696	\$6,639	
6	Large General Service >= 1,000 kW	48	\$1,132	\$968	\$717	(\$1,219)	\$466	\$179	\$1,685	\$968	\$108	(\$17,844)	\$0	(\$15,493)	\$3,692	
7	Partial Req. Svc. >= 1,000 kW	47	\$21	\$8	\$6	(\$10)	\$4	\$1	\$14	\$8	\$1	(\$150)	\$0	(\$120)	\$30	
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	\$10	\$77	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10	\$77	
9	Agricultural Pumping Service	41	\$122	\$122	\$82	(\$164)	\$33	\$12	\$115	\$66	\$7	(\$3,407)	(\$3,527)	(\$3,250)	(\$3,266)	
10	<b>Total Commercial &amp; Industrial</b>		\$3,419	\$2,861	\$1,984	(\$3,520)	\$1,120	\$413	\$4,017	\$2,340	\$248	(\$9,949)	\$9,671	(\$3,945)	\$18,722	
<b>Lighting</b>																
11	Outdoor Area Lighting Service	15	\$5	\$2	\$1	(\$6)	\$0	\$0	\$1	\$0	\$0	\$74	\$188	\$74	\$186	
12	Street Lighting Service Comp. Owned	51	\$21	\$7	\$4	(\$22)	\$1	\$0	\$3	\$1	\$0	\$383	\$816	\$387	\$809	
13	Street Lighting Service, Cust Owned	53	\$5	\$10	\$2	(\$4)	\$1	\$0	\$4	\$1	\$0	\$205	\$270	\$210	\$283	
14	Recreational Field Lighting	54	\$1	\$1	\$0	(\$1)	\$0	\$0	\$0	\$0	\$0	\$26	\$35	\$27	\$36	
15	<b>Total Public Street Lighting</b>		\$31	\$19	\$7	(\$33)	\$1	\$1	\$8	\$3	\$0	\$688	\$1,309	\$698	\$1,314	
16	<b>Subtotal</b>		\$6,709	\$5,754	\$3,850	(\$7,102)	\$1,967	\$695	\$7,068	\$4,090	\$474	(\$4,191)	(\$6)	\$6,491	\$16,093	
17	Employee Discount		(\$2)	(\$2)	(\$1)	\$2	(\$0)	(\$0)	(\$2)	(\$1)	(\$0)	(\$3)	\$6	(\$6)	\$2	
18	<b>Total</b>		\$6,707	\$5,752	\$3,849	(\$7,100)	\$1,966	\$695	\$7,066	\$4,089	\$473	(\$4,194)	\$0	\$6,486	\$16,095	



**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 4 + Cost-Based Supply Service**  
**Residential Service - Single Family**

kWh	Monthly Billing*			Percent Difference
	Present Price	Proposed Price	Difference	
100	\$19.75	\$23.44	\$3.69	18.68%
200	\$28.77	\$33.64	\$4.87	16.93%
300	\$37.78	\$43.86	\$6.08	16.09%
400	\$46.80	\$54.07	\$7.27	15.53%
500	\$55.82	\$64.29	\$8.47	15.17%
600	\$64.84	\$74.50	\$9.66	14.90%
700	\$73.86	\$84.71	\$10.85	14.69%
800	\$82.87	\$94.93	\$12.06	14.55%
<b>900</b>	<b>\$91.89</b>	<b>\$105.13</b>	<b>\$13.24</b>	<b>14.41%</b>
1,000	\$100.91	\$115.35	\$14.44	14.31%
1,100	\$112.06	\$126.27	\$14.21	12.68%
1,200	\$123.20	\$137.17	\$13.97	11.34%
1,300	\$134.36	\$148.09	\$13.73	10.22%
1,400	\$145.50	\$159.00	\$13.50	9.28%
1,500	\$156.65	\$169.91	\$13.26	8.46%
1,600	\$167.79	\$180.83	\$13.04	7.77%
2,000	\$212.38	\$224.48	\$12.10	5.70%
3,000	\$323.85	\$333.60	\$9.75	3.01%
4,000	\$435.31	\$442.72	\$7.41	1.70%
5,000	\$546.78	\$551.85	\$5.07	0.93%

\* Net rate including Schedules 91, 98, 290 and 291.  
Note: Annualized monthly bill for seasonal rates.

**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 4 + Cost-Based Supply Service**  
**Residential Service - Multi-Family**

kWh	Monthly Billing*			Percent Difference
	Present Price	Proposed Price	Difference	
100	\$18.22	\$19.38	\$1.16	6.37%
200	\$27.24	\$29.58	\$2.34	8.59%
300	\$36.25	\$39.80	\$3.55	9.79%
400	\$45.27	\$50.01	\$4.74	10.47%
500	\$54.29	\$60.23	\$5.94	10.94%
600	\$63.31	\$70.44	\$7.13	11.26%
700	\$72.33	\$80.65	\$8.32	11.50%
800	\$81.34	\$90.87	\$9.53	11.72%
900	\$90.36	\$101.07	\$10.71	11.85%
1,000	\$99.38	\$111.29	\$11.91	11.98%
1,100	\$110.53	\$122.21	\$11.68	10.57%
1,200	\$121.67	\$133.11	\$11.44	9.40%
1,300	\$132.83	\$144.03	\$11.20	8.43%
1,400	\$143.97	\$154.94	\$10.97	7.62%
1,500	\$155.11	\$165.85	\$10.74	6.92%
1,600	\$166.26	\$176.77	\$10.51	6.32%
2,000	\$210.85	\$220.42	\$9.57	4.54%
3,000	\$322.32	\$329.54	\$7.22	2.24%
4,000	\$433.78	\$438.66	\$4.88	1.12%
5,000	\$545.25	\$547.79	\$2.54	0.47%

\* Net rate including Schedules 91, 98, 290 and 291.  
Note: Annualized monthly bill for seasonal rates.



**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 23 + Cost-Based Supply Service**  
**General Service - Secondary Delivery Voltage**

k W Load Size	kWh	Monthly Billing*						Percent	
		Present Price		Proposed Price		Difference		Single Phase	Three Phase
		Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase		
5	500	\$68	\$77	\$73	\$82	8.03%	7.07%	8.03%	7.07%
	750	\$93	\$102	\$101	\$110	8.85%	8.04%		
	1,000	\$118	\$127	\$129	\$138	9.31%	8.63%		
	1,500	\$169	\$177	\$185	\$194	9.83%	9.32%		
	10	1,000	\$118	\$127	\$129	\$138	9.31%		
20	2,000	\$219	\$228	\$241	\$250	10.11%	9.70%	10.11%	9.70%
	3,000	\$319	\$328	\$353	\$361	10.41%	10.12%		
	4,000	\$407	\$415	\$451	\$460	10.91%	10.67%		
	4,000	\$437	\$446	\$487	\$496	11.41%	11.18%		
	6,000	\$612	\$620	\$684	\$692	11.79%	11.62%		
30	8,000	\$786	\$795	\$880	\$889	12.00%	11.86%	12.00%	11.86%
	10,000	\$960	\$969	\$1,077	\$1,085	12.13%	12.02%		
	9,000	\$935	\$943	\$1,051	\$1,060	12.47%	12.35%		
	12,000	\$1,196	\$1,205	\$1,346	\$1,355	12.53%	12.43%		
	15,000	\$1,458	\$1,466	\$1,641	\$1,650	12.56%	12.49%		
18,000	\$1,719	\$1,728	\$1,936	\$1,944	12.59%	12.52%			

\* Net rate including Schedules 91, 290 and 291.

**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 23 + Cost-Based Supply Service**  
**General Service - Primary Delivery Voltage**

k W Load Size	kWh	Monthly Billing*						Percent	
		Present Price		Proposed Price		Single Phase	Three Phase	Single Phase	Three Phase
		Single Phase	Three Phase	Single Phase	Three Phase				
5	500	\$67	\$76	\$72	\$81			8.02%	7.03%
	750	\$92	\$101	\$100	\$109			8.85%	8.03%
	1,000	\$116	\$125	\$127	\$136			9.32%	8.63%
	1,500	\$166	\$175	\$182	\$191			9.84%	9.33%
	10	1,000	\$116	\$125	\$127	\$136			9.32%
20	2,000	\$215	\$224	\$237	\$246			10.13%	9.71%
	3,000	\$314	\$323	\$347	\$355			10.43%	10.13%
	4,000	\$400	\$408	\$443	\$452			10.93%	10.68%
	10,000	\$430	\$439	\$479	\$488			11.43%	11.20%
	20	6,000	\$602	\$610	\$673	\$681			11.81%
30	8,000	\$773	\$782	\$866	\$875			12.02%	11.88%
	10,000	\$944	\$953	\$1,059	\$1,068			12.15%	12.03%
	9,000	\$920	\$928	\$1,035	\$1,043			12.49%	12.37%
	12,000	\$1,177	\$1,185	\$1,324	\$1,333			12.55%	12.45%
	15,000	\$1,434	\$1,443	\$1,614	\$1,623			12.58%	12.50%
18,000	\$1,691	\$1,700	\$1,904	\$1,913			12.61%	12.54%	

\* Net rate including Schedules 91, 290 and 291.

**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 28 + Cost-Based Supply Service**  
**Large General Service - Secondary Delivery Voltage**

kW Load Size	kWh	Monthly Billing*		Percent Difference
		Present Price	Proposed Price	
15	3,000	\$328	\$328	-0.13%
	4,500	\$426	\$426	0.13%
	7,500	\$621	\$623	0.41%
31	6,200	\$658	\$657	-0.12%
	9,300	\$859	\$860	0.15%
	15,500	\$1,262	\$1,268	0.42%
40	8,000	\$843	\$842	-0.11%
	12,000	\$1,103	\$1,105	0.15%
	20,000	\$1,623	\$1,630	0.43%
60	12,000	\$1,256	\$1,254	-0.11%
	18,000	\$1,646	\$1,648	0.16%
	30,000	\$2,426	\$2,437	0.43%
80	16,000	\$1,662	\$1,661	-0.11%
	24,000	\$2,183	\$2,186	0.16%
	40,000	\$3,223	\$3,237	0.43%
100	20,000	\$2,069	\$2,067	-0.10%
	30,000	\$2,719	\$2,724	0.16%
	50,000	\$4,020	\$4,037	0.44%
200	40,000	\$4,071	\$4,066	-0.12%
	60,000	\$5,371	\$5,379	0.15%
	100,000	\$7,972	\$8,007	0.43%

\* Net rate including Schedules 91, 290 and 291.

**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 28 + Cost-Based Supply Service**  
**Large General Service - Primary Delivery Voltage**

kW Load Size	kWh	Monthly Billing*		Percent Difference
		Present Price	Proposed Price	
15	4,500	\$429	\$389	-9.37%
	6,000	\$521	\$481	-7.67%
	7,500	\$612	\$573	-6.47%
31	9,300	\$860	\$784	-8.77%
	12,400	\$1,049	\$974	-7.13%
	15,500	\$1,238	\$1,164	-5.99%
40	12,000	\$1,102	\$1,007	-8.64%
	16,000	\$1,346	\$1,252	-7.01%
	20,000	\$1,590	\$1,496	-5.89%
60	18,000	\$1,643	\$1,505	-8.41%
	24,000	\$2,009	\$1,872	-6.82%
	30,000	\$2,375	\$2,240	-5.72%
80	24,000	\$2,176	\$1,996	-8.27%
	32,000	\$2,664	\$2,486	-6.70%
	40,000	\$3,152	\$2,976	-5.61%
100	30,000	\$2,710	\$2,488	-8.19%
	40,000	\$3,320	\$3,100	-6.63%
	50,000	\$3,930	\$3,712	-5.55%
200	60,000	\$5,342	\$4,915	-7.98%
	80,000	\$6,562	\$6,139	-6.44%
	100,000	\$7,782	\$7,363	-5.38%

\* Net rate including Schedules 91, 290 and 291.

**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 30 + Cost-Based Supply Service**  
**Large General Service - Secondary Delivery Voltage**

kW Load Size	kWh	Monthly Billing*		Percent Difference
		Present Price	Proposed Price	
100	20,000	\$2,505	\$2,558	2.12%
	30,000	\$2,990	\$2,993	0.10%
	50,000	\$3,960	\$3,863	-2.45%
200	40,000	\$4,505	\$4,658	3.39%
	60,000	\$5,475	\$5,528	0.96%
	100,000	\$7,415	\$7,268	-1.99%
300	60,000	\$6,685	\$6,921	3.53%
	90,000	\$8,140	\$8,225	1.05%
	150,000	\$11,050	\$10,835	-1.94%
400	80,000	\$8,737	\$9,056	3.65%
	120,000	\$10,677	\$10,796	1.11%
	200,000	\$14,557	\$14,276	-1.93%
500	100,000	\$10,825	\$11,232	3.76%
	150,000	\$13,250	\$13,407	1.19%
	250,000	\$18,100	\$17,757	-1.89%
600	120,000	\$12,912	\$13,409	3.84%
	180,000	\$15,822	\$16,019	1.24%
	300,000	\$21,642	\$21,238	-1.87%
800	160,000	\$17,087	\$17,761	3.94%
	240,000	\$20,967	\$21,241	1.31%
	400,000	\$28,727	\$28,201	-1.83%
1000	200,000	\$21,262	\$22,114	4.01%
	300,000	\$26,112	\$26,463	1.35%
	500,000	\$35,792	\$35,143	-1.81%

\* Net rate including Schedules 91, 290 and 291.

**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 30 + Cost-Based Supply Service**  
**Large General Service - Primary Delivery Voltage**

kW Load Size	kWh	Monthly Billing*		Percent Difference
		Present Price	Proposed Price	
100	30,000	\$2,979	\$2,959	-0.65%
	40,000	\$3,465	\$3,395	-2.04%
	50,000	\$3,952	\$3,830	-3.08%
200	60,000	\$5,467	\$5,488	0.39%
	80,000	\$6,440	\$6,359	-1.26%
	100,000	\$7,412	\$7,229	-2.47%
300	90,000	\$8,123	\$8,164	0.51%
	120,000	\$9,582	\$9,470	-1.17%
	150,000	\$11,042	\$10,776	-2.41%
400	120,000	\$10,679	\$10,755	0.71%
	160,000	\$12,625	\$12,496	-1.02%
	200,000	\$14,571	\$14,237	-2.29%
500	150,000	\$13,249	\$13,355	0.80%
	200,000	\$15,681	\$15,531	-0.95%
	250,000	\$18,113	\$17,708	-2.24%
600	180,000	\$15,818	\$15,955	0.86%
	240,000	\$18,737	\$18,567	-0.91%
	300,000	\$21,656	\$21,178	-2.20%
800	240,000	\$20,958	\$21,155	0.94%
	320,000	\$24,849	\$24,637	-0.85%
	400,000	\$28,740	\$28,119	-2.16%
1000	300,000	\$26,097	\$26,355	0.99%
	400,000	\$30,961	\$30,708	-0.82%
	500,000	\$35,805	\$35,040	-2.14%

\* Net rate including Schedules 91, 290 and 291.

**Pacific Power  
Billing Comparison  
Delivery Service Schedule 41 + Cost-Based Supply Service  
Agricultural Pumping - Secondary Delivery Voltage**

kW Load Size	kWh	Present Price*		Proposed Price*		Percent Difference	
		Monthly Bill	Annual Load Size Charge	Monthly Bill	Annual Load Size Charge	April - November Monthly Bill	Annual Load Size Charge
<u>Single Phase</u>							
10	2,000	\$161	\$175	\$180	\$174	12.30%	-0.53%
	3,000	\$241	\$175	\$271	\$174	12.30%	-0.53%
	5,000	\$402	\$175	\$451	\$174	12.29%	-0.53%
<u>Three Phase</u>							
20	4,000	\$321	\$349	\$361	\$347	12.30%	-0.54%
	6,000	\$482	\$349	\$541	\$347	12.30%	-0.54%
	10,000	\$803	\$349	\$902	\$347	12.30%	-0.54%
100	20,000	\$1,607	\$1,561	\$1,804	\$1,614	12.30%	3.36%
	30,000	\$2,410	\$1,561	\$2,706	\$1,614	12.30%	3.36%
	50,000	\$4,016	\$1,561	\$4,510	\$1,614	12.30%	3.36%
300	60,000	\$4,820	\$3,929	\$5,412	\$3,990	12.30%	1.55%
	90,000	\$7,229	\$3,929	\$8,118	\$3,990	12.30%	1.55%
	150,000	\$12,049	\$3,929	\$13,530	\$3,990	12.30%	1.55%

\* Net rate including Schedules 91, 98, 290 and 291.

**Pacific Power  
Billing Comparison  
Delivery Service Schedule 41 + Cost-Based Supply Service  
Agricultural Pumping - Primary Delivery Voltage**

kW Load Size	kWh	Present Price*		Proposed Price*		Percent Difference	
		Monthly Bill	Annual Load Size Charge	Monthly Bill	Annual Load Size Charge	April - November Monthly Bill	Annual Load Size Charge
<u>Single Phase</u>							
10	3,000	\$236	\$172	\$266	\$172	12.36%	-0.53%
	4,000	\$315	\$172	\$354	\$172	12.36%	-0.53%
	5,000	\$394	\$172	\$443	\$172	12.36%	-0.53%
<u>Three Phase</u>							
20	6,000	\$473	\$345	\$531	\$343	12.36%	-0.54%
	8,000	\$630	\$345	\$708	\$343	12.36%	-0.54%
	10,000	\$788	\$345	\$885	\$343	12.36%	-0.54%
100	30,000	\$2,364	\$1,541	\$2,656	\$1,583	12.36%	2.76%
	40,000	\$3,152	\$1,541	\$3,542	\$1,583	12.36%	2.76%
	50,000	\$3,940	\$1,541	\$4,427	\$1,583	12.36%	2.76%
300	90,000	\$7,092	\$3,868	\$7,969	\$3,919	12.36%	1.31%
	120,000	\$9,457	\$3,868	\$10,626	\$3,919	12.36%	1.31%
	150,000	\$11,821	\$3,868	\$13,282	\$3,919	12.36%	1.31%

\* Net rate including Schedules 91, 98, 290 and 291.



**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 48 + Cost-Based Supply Service**  
**Large General Service - Secondary Delivery Voltage**  
**1,000 kW and Over**

kW Load Size	kWh	Monthly Billing		Percent Difference
		Present Price	Proposed Price	
1,000	300,000	\$25,940	\$26,719	3.00%
	500,000	\$35,159	\$36,811	4.70%
	700,000	\$44,190	\$46,715	5.71%
2,000	600,000	\$51,165	\$52,745	3.09%
	1,000,000	\$67,127	\$70,519	5.05%
	1,400,000	\$84,164	\$89,337	6.15%
6,000	1,800,000	\$137,264	\$146,197	6.51%
	3,000,000	\$188,374	\$202,650	7.58%
	4,200,000	\$239,484	\$259,103	8.19%
12,000	3,600,000	\$272,363	\$290,300	6.59%
	6,000,000	\$374,583	\$403,207	7.64%
	8,400,000	\$476,804	\$516,113	8.24%

Notes:	Present	Proposed
On-Peak kWh	38.11%	38.11%
Off-Peak kWh	61.89%	61.89%

\* Net rate including Schedules 91, 290 and 291. Restricted Sch 291 applied to levels over 730,000 kWh.

**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 48 + Cost-Based Supply Service**  
**Large General Service - Primary Delivery Voltage**  
**1,000 kW and Over**

kW Load Size	kWh	Monthly Billing		Percent Difference
		Present Price	Proposed Price	
1,000	300,000	\$24,192	\$25,074	3.65%
	500,000	\$32,897	\$34,861	5.97%
	700,000	\$41,415	\$44,460	7.35%
2,000	600,000	\$47,698	\$49,465	3.70%
	1,000,000	\$62,546	\$66,553	6.41%
	1,400,000	\$78,538	\$84,749	7.91%
6,000	1,800,000	\$135,690	\$141,132	4.01%
	3,000,000	\$183,663	\$195,720	6.56%
	4,200,000	\$231,637	\$250,307	8.06%
12,000	3,600,000	\$269,330	\$280,202	4.04%
	6,000,000	\$365,277	\$389,377	6.60%
	8,400,000	\$461,223	\$498,552	8.09%

Notes:	Present	Proposed
On-Peak kWh	37.88%	37.88%
Off-Peak kWh	62.12%	62.12%

\* Net rate including Schedules 91, 290 and 291. Restricted Sch 291 applied to levels over 730,000 kWh.

**Pacific Power**  
**Monthly Billing Comparison**  
**Delivery Service Schedule 48 + Cost-Based Supply Service**  
**Large General Service - Transmission Delivery Voltage**  
**1,000 kW and Over**

kW Load Size	kWh	Monthly Billing		Percent Difference
		Present Price	Proposed Price	
1,000	500,000	\$31,074	\$33,294	7.14%
	700,000	\$39,017	\$42,595	9.17%
2,000	1,000,000	\$58,661	\$63,192	7.72%
	1,400,000	\$73,480	\$80,780	9.93%
6,000	3,000,000	\$173,411	\$187,012	7.84%
	4,200,000	\$217,870	\$239,776	10.05%
12,000	6,000,000	\$344,428	\$371,641	7.90%
	8,400,000	\$433,347	\$477,169	10.11%

Notes:	Present	Proposed
On-Peak kWh	37.61%	37.61%
Off-Peak kWh	62.39%	62.39%

\* Net rate including Schedules 91, 290 and 291. Restricted Sch 291 applied to levels over 730,000 kWh.

Docket No. UE 399  
Exhibit PAC/2107  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith  
Proposed Adjustment Schedule Rates for Deferred Amounts

July 2022

**PACIFIC POWER**  
**Calculation of Proposed Change to Renewable Resource Deferral Supply Service Adjustment - Schedule 203**

**FORECAST 12 MONTHS ENDED DECEMBER 31, 2023**

Line No.	Description (1)	Sch No.	MWh* (3)	Generation Rate Spread (4)	Proposed Schedule 203 Rate Adder (¢/kWh) (5)	Proposed Schedule 203 Additional Revenues (\$000) (6)	Total Proposed Sch 203 Rates for Tariff (¢/kWh) (7)
<b>Residential</b>							
1	Residential	4	5,633,856	43.2%	0.049	\$2,761	0.054
2	<b>Total Residential</b>		5,633,856			\$2,761	
<b>Commercial &amp; Industrial</b>							
3	Gen. Svc. < 31 kW	23	1,137,011	8.2%	0.046	\$523	0.051
4	Gen. Svc. 31 - 200 kW	28	1,992,271	14.2%	0.045	\$897	0.050
5	Gen. Svc. 201 - 999 kW	30	1,281,581	9.0%	0.044	\$564	0.049
6	Large General Service >= 1,000 kW	48	3,584,056	23.7%	0.042	\$1,505	0.047
7	Partial Req. Svc. >= 1,000 kW	47	29,109		0.042	\$12	0.047
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	0		-	\$0	-
9	Agricultural Pumping Service	41	234,973	1.6%	0.044	\$103	0.049
10	<b>Total Commercial &amp; Industrial</b>		8,259,000			\$3,604	
<b>Lighting</b>							
11	Outdoor Area Lighting Service	15	2,108		0.033	\$1	0.037
12	Street Lighting Service Comp. Owned	51	8,373		0.033	\$3	0.038
13	Street Lighting Service Cust. Owned	53	11,452		0.033	\$4	0.035
14	Recreational Field Lighting	54	1,141		0.033	\$0	0.036
15	<b>Total Lighting</b>		23,074	0.1%	0.033	\$8	
16	<b>Subtotal</b>		13,915,931	100.0%		\$6,373	
17	Employee Discount					(\$2)	
18	<b>Total Sales with Employee Discount</b>					\$6,371	

\* Includes lighting tariff MWh

**PACIFIC POWER**  
**Calculation of Proposed Deferred Accounting Adjustment - Schedule 192**

**FORECAST 12 MONTHS ENDED DECEMBER 31, 2023**

Line No.	Description (1)	Sch No. (2)	MWh* (3)	Proposed Base Revenues (4)	Equal Percentage Rate Spread (5)	Proposed Schedule 192	
						Rates (¢/kWh) (6)	Revenues (\$000) (7)
<b><u>Residential</u></b>							
1	Residential	4	5,633,856	\$667,125	50.8%	0.051	\$2,873
2	<b>Total Residential</b>		5,633,856	\$667,125			\$2,873
<b><u>Commercial &amp; Industrial</u></b>							
3	Gen. Svc. < 31 kW	23	1,137,011	\$137,278	10.4%	0.052	\$591
4	Gen. Svc. 31 - 200 kW	28	1,992,271	\$162,590	12.4%	0.035	\$697
5	Gen. Svc. 201 - 999 kW	30	1,281,581	\$92,215	7.0%	0.031	\$397
6	Large General Service >= 1,000 kW	48	3,584,056	\$222,164	16.9%	0.027	\$968
7	Partial Req. Svc. >= 1,000 kW	47	29,109	\$3,775		0.027	\$8
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	286,471	\$1,378		0.027	\$77
9	Agricultural Pumping Service	41	234,973	\$28,354	2.2%	0.052	\$122
10	<b>Total Commercial &amp; Industrial</b>		8,259,000	\$647,754			\$2,861
<b><u>Lighting</u></b>							
11	Outdoor Area Lighting Service	15	2,108	\$804		0.084	\$2
12	Street Lighting Service Comp. Owned	51	8,373	\$3,075		0.084	\$7
13	Street Lighting Service Cust. Owned	53	11,452	\$584		0.084	\$10
14	Recreational Field Lighting	54	1,141	\$72		0.084	\$1
15	<b>Total Lighting</b>		23,074	\$4,535	0.3%	0.084	\$19
16	<b>Subtotal</b>		13,915,931	\$1,319,414	100.0%		\$5,754
17	Employee Discount			(\$380)			(\$2)
18	<b>Total Sales with Employee Discount</b>			\$1,322,250			\$5,752

\* Includes Distribution Only consumer MWh and lighting tariff MWh

Docket No. UE 399  
Exhibit PAC/2108  
Witness: Robert M. Meredith

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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Reply Testimony of Robert M. Meredith  
Washington Renewable Future Peak Credit Method

July 2022

**PacifiCorp**  
**State of Washington**  
**Classification of Fixed Generation Costs**

Washington Pumped Storage, 1,200 MW X 16,800 MWh		
1	Fixed Cost per kW-year <sup>1</sup>	\$179.48
2	Cost per MWh to Charge <sup>2</sup>	\$27.13
3	Hours of Operation	12
4	Storage Efficiency <sup>2</sup>	79%
5	Total Cost of Charging	\$0.41    Line 2 / 1000 / Line 4 X Line 3
6	Total Cost 1 kW-year, 12 Hours	\$179.89    Line 1 + Line 5
3.6 MW Turbine 43.6% Capacity Factor WY, 2020 (100% PTC)		
7	Fixed Cost per kW-year <sup>3</sup>	\$118.59
8	Average Output Requirement @ 53.6% Load Factor <sup>4</sup>	5,554    8,760 X 63.4%
9	Output @ 43.6% Capacity Factor <sup>3</sup>	3,819    8,760 X 43.6%
10	Total kW Capacity Required	1.45    Line 8 / Line 9
11	Total Fixed Costs	\$172.45    Line 7 X Line 10
12	Demand Related Cost @ 19% Capacity Contribution <sup>5</sup>	\$49.59    Line 10 X 19% X Line 1
13	Total Energy Related Cost	\$122.86    Line 11 - Line 12
14	Demand Component	59%    Line 6 / (Line 6 + Line 13)
15	Energy Component	41%    100% - Line 14

Footnotes -

- 1 - See page 7 of the Supply-Side Resource Table for PacifiCorp's 2019 Integrated Resource Plan dated November 1, 2018.
- 2 - See page 14 of the Supply-Side Resource Table for PacifiCorp's 2019 Integrated Resource Plan dated November 1, 2018.
- 3 - See page 6 of the Supply-Side Resource Table for PacifiCorp's 2019 Integrated Resource Plan dated November 1, 2018.
- 4 - 53.6% is the load factor for the West Control Area for the 12 month period ended June 2019.
- 5 - See page 88 of the presentation made at PacifiCorp's Integrated Resource Plan public input meeting held on September 27-28, 2018.