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May 10, 2006

Via Electronic and U.S. Mail

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

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON
Staff's Investigation Related to Electric Utility Purchases from
Qualifying Facilities.
Docket No. UM 1129

Dear Filing Center:

Enclosed please find an original and six copies of the Motion to Admit
Testimony and Exhibits and Additional Exhibits 308-310, as well as an original and two
copies of the Affidavit of R. Thomas Beach on behalf of Weyerhaeuser and the Industrial
Customers of Northwest Utilities in the above-captioned docket.

Please return one file-stamped copy of the document in the self-addressed,
stamped envelope provided. Thank you for your assistance.

Sincerely yours,

/s/ Anna E. Studenny
Anna E. Studenny

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the Motion to Admit Testimony and Exhibits and Additional Exhibits 308-310, as well as an original and two copies of the Affidavit of R. Thomas Beach on behalf of Weyerhaeuser and the Industrial Customers of Northwest Utilities upon the parties, shown below, on the official service list by causing the foregoing document to be deposited, postage-prepaid, in the U.S. Mail, or by service via electronic mail to those parties who waived paper service.

DATED at Portland, Oregon, this 10th day of May, 2006.

DAVISON VAN CLEVE, P.C.

/s/ Anna E. Studenny
Anna E. Studenny

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1129**

In the Matter of the)	
)	
PUBLIC UTILITY COMMISSION OF)	MOTION TO ADMIT TESTIMONY
OREGON)	AND EXHIBITS OF WEYERHAEUSER
)	COMPANY AND THE INDUSTRIAL
Staff's Investigation Related to Electric Utility)	CUSTOMERS OF NORTHWEST
Purchases from Qualifying Facilities.)	UTILITIES
_____)	

Pursuant to the Administrative Law Judge's April 27, 2006 Memorandum, Weyerhaeuser Company and the Industrial Customers of Northwest Utilities ("ICNU") hereby move the Commission for an Order admitting the testimony and exhibits sponsored by R. Thomas Beach in this proceeding. Mr. Beach filed direct testimony and exhibits (Weyerhaeuser-ICNU/300-303) on February 27, 2006, and rebuttal testimony and exhibits (Weyerhaeuser-ICNU/304-307) on April 7, 2006. An errata page to Mr. Beach's rebuttal testimony was filed on May 5, 2006. Mr. Beach's affidavit concerning his testimony and exhibits is attached to this motion.

Furthermore, Weyerhaeuser Company and ICNU hereby move for the admission of additional exhibits consisting of data responses provided by PacifiCorp, Portland General Electric Company, and Idaho Power Company to Weyerhaeuser Company and ICNU in this proceeding. The utilities do not oppose the submission of their respective data responses into the record. These exhibits are identified as Weyerhaeuser-ICNU/308-310 and are attached to this motion.

Dated this 10th day of May, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion Sanger

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Of Attorneys for the Industrial Customers of
Northwest Utilities

PAGE 2 – MOTION TO ADMIT TESTIMONY AND EXHIBITS OF WEYERHAEUSER
COMPANY AND THE INDUSTRIAL CUSTOMERS OF NORTHWEST
UTILITIES

Weyerhaeuser-ICNU/308

PacifiCorp Responses to
ICNU Data Requests

UM-1129/PacifiCorp
March 17, 2006
ICNU 11th Set Data Request 11.5

ICNU Data Request 11.5

Regarding PPL/404, Griswold/6, please provide an example of how PacifiCorp has adjusted, or would adjust, a QF contract for dispatchability and/or reliability.

Response to ICNU Data Request 11.5

See Attachment ICNU 11.5 which contains a spreadsheet with the calculation for dispatchability adjustment.

OREGON

**ELECTRIC UTILITY PURCHASES FROM
QUALIFYING FACILITIES**

UM-1129

PACIFICORP

ICNU 11th SET DATA REQUEST

ATTACHMENT ICNU 11.5

Attachment ICNU 11.5
 QF is 50MW thermal cogeneration plant

Date	Day	Prescheduled HLH	QF Delivered HLH	Availability HLH	Comments
Mon, May 01, 2006	1	50	50	100%	
Tue, May 02, 2006	2	50	50	100%	
Wed, May 03, 2006	3	50	48	96%	
Thu, May 04, 2006	4	50	49	98%	
Fri, May 05, 2006	5	50	30	60%	
Sat, May 06, 2006	6	50	35	70%	
Sun, May 07, 2006	7				
Mon, May 08, 2006	8				Scheduled Maintenance
Tue, May 09, 2006	9				Scheduled Maintenance
Wed, May 10, 2006	10				Scheduled Maintenance
Thu, May 11, 2006	12	50	50	100%	
Fri, May 12, 2006	12	50	49	98%	
Sat, May 13, 2006	13	50	0	0%	
Sun, May 14, 2006	14				
Mon, May 15, 2006	15	50	47	94%	
Tue, May 16, 2006	16	50	50	100%	
Wed, May 17, 2006	16	50	20	40%	
Thu, May 18, 2006	18	50	47	94%	
Fri, May 19, 2006	19	50	45	90%	
Sat, May 20, 2006	20	50	50	100%	
Sun, May 21, 2006	21				
Mon, May 22, 2006	22	50	50	100%	
Tue, May 23, 2006	23	50	40	80%	
Wed, May 24, 2006	24	50	40	80%	
Thu, May 25, 2006	25	50	40	80%	
Fri, May 26, 2006	26	50	50	100%	
Sat, May 27, 2006	27	50	40	80%	
Sun, May 28, 2006	28				
Mon, May 29, 2006	29	50	50	100%	
Tue, May 30, 2006	30	50	50	100%	
Wed, May 31, 2006	31	50	50	100%	
		50	43	85.8%	Monthly Average

UM-1129/PacifiCorp
March 17, 2006
ICNU 11th Set Data Request 11.17

ICNU Data Request 11.17

Regarding PPL/404, Griswold/23, please identify the name, type, size and location of all buy-all/sell-all, and net output sales QF contracts that PacifiCorp has entered into since 1990.

Response to ICNU Data Request 11.17

See attached spreadsheet, Attachment ICNU 11.17.

OREGON

**ELECTRIC UTILITY PURCHASES FROM
QUALIFYING FACILITIES**

UM-1129

PACIFICORP

ICNU 11th SET DATA REQUEST

ATTACHMENT ICNU 11.17

Attachment ICNU 11.17

PacifiCorp
QF Power Purchase Agreements since 1990

Line No.	Type	St.	Contract	Size (kW)	PPA option
1	Hydro	ID	Com. Energy Mgmt	900	Buy All/Sell All
2	Biogas	OR	Rickreall Dairy	848	Buy All/Sell All
3	Biogas	UT	Ballard Hog Farm	80	Buy All/Sell All
4	Biogas	UT	Wadeland South	125	Buy All/Sell All
5	Biogas	UT	Weber County	950	Buy All/Sell All
6	Gas	UT	US Magnesium	36,000	Buy All/Sell All
7	Hydro	UT	Thayn Hydro	475	Buy All/Sell All
8	Hydro	UT	Alta Energy	567	Buy All/Sell All
9	Biogas	UT	Hill AFB	1,400	Buy All/Sell All
10	Biogas	UT	Sunderland Dairy	150	Buy All/Sell All
11	Cogen	UT	Tesoro (1)	25,000	Buy All/Sell All
12	Cogen	UT	Desert Power	95,000	Buy All/Sell All
13	Cogen	UT	Kennecott Utah Copper	31,800	Buy All/Sell All
14	Hydro	WY	City of Buffalo	200	Buy All/Sell All
15	Gas	WY	Simplot Phosphates (SF Phosphates)	11,200	Buy All/Sell All
16	Hydro	WY	Shoshone Irrigation	3,000	Buy All/Sell All
17	Cogen	WY	ExxonMobil	107,400	Buy All/Sell All
18	Solar	OR	Quail Mountain	100	Excess of Load
19	Hydro	UT	Draper Irrigation Company	511	Excess of Load
20	Gas	UT	Davis County Waste	1,600	Excess of Load
21	Cogen	UT	Tesoro (1)	25,000	Excess of Load

Weyerhaeuser-ICNU/308
Beach/5

UM-1129/PacifiCorp
March 17, 2006
ICNU 11th Set Data Request 11.20

ICNU Data Request 11.20

Regarding PPL/404, Griswold/24-25, how frequently does PacifiCorp intend to have competitive bids that 100 MW or larger QFs can participate in?

Response to ICNU Data Request 11.20

The frequency of the Company's competitive bid process is driven by the Company's Integrated Resource Plan.

UM-1129/PacifiCorp
March 17, 2006
ICNU 11th Set Data Request 11.26

ICNU Data Request 11.26

Regarding PPL/404, Griswold/27, please provide the methodology that PacifiCorp proposes to utilize to adjust large QFs avoided costs for debt imputation.

Response to ICNU Data Request 11.26

In the event that PacifiCorp incurs a cost due to debt imputation of a specific large QF project, the implicit debt cost would be separate from the avoided cost pricing process and included in the power purchase agreement as a monthly line-item adjustment to the QF payment rather than embedded in the proxy stage of the avoided cost pricing process.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.1

ICNU Data Request 13.1

Regarding PPL/407, is PacifiCorp's avoided resource a natural gas fired generation unit?

Response to ICNU Data Request 13.1

Yes, the proxy unit in existing rates is based on a natural gas fired generation unit.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.5

ICNU Data Request 13.5

Regarding PPL/900 and PPL/807, Shah/4, please provide the dollar amount of the adverse impacts of QF related debt imputation on PacifiCorp.

Response to ICNU Data Request 13.5

The Company has not calculated the requested amount. The dollar amount of adverse impacts of QF related debt imputation on PacifiCorp customers should be estimated on a case by case basis, using the methodology described PacifiCorp's Response to ICNU Data Request 11.29.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.6

ICNU Data Request 13.6

On pages 5-6 of PPL/407, PacifiCorp sets out its methodology for line loss adjustments. Please confirm that this is a “plus or minus” methodology – either the QF is closer to the load center than the proxy resource (and receives a line loss credit), or it is farther away (and receives a debit on its avoided costs due to losses).

Response to ICNU Data Request 13.6

Yes, as indicated on page 6 of Bruce Griswold’s Rebuttal Testimony.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.7

ICNU Data Request 13.7

If PacifiCorp's avoided proxy resource is in Utah, does PacifiCorp's proposed line loss methodology mean that all Oregon QFs will receive a line loss debit because they are further from the proxy plant than PacifiCorp's Utah load centers? Please explain your response.

Response to ICNU Data Request 13.7

Yes, the physical proximity of the QF to both the proxy plant and the load center would determine the calculation of the cost or the benefit the QF would be providing to the system. To the extent the Oregon QF is not providing a benefit then the cost of losses would apply.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.8

ICNU Data Request 13.8

Regarding PPL/407, Griswold/5, line 20, what does PacifiCorp mean by "the nearest load center" to the QF?

Response to ICNU Data Request 13.8

The "nearest load center" refers to any load or an accumulation of load within the closest proximity of the QF generator.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.9

ICNU Data Request 13.9

What is “the nearest load center” to Weyerhaeuser’s Albany Mill in Albany, Oregon?

Response to ICNU Data Request 13.9

The Weyerhaeuser Albany Paper Mill is in Albany and the surrounding PacifiCorp load in the North Willamette valley.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.10

ICNU Data Request 13.10

Please explain how the type of power delivered to PacifiCorp (as set forth on page 5, line 21 of PPL/407) affects the proposed line loss adjustment. Provide a quantitative example of an adjustment to line losses based on the type of power provided by the QF.

Response to ICNU Data Request 13.10

The type of power provided by the QF will determine if a line loss adjustment, both as an increase (cost) or reduction (benefit), is applied. Line loss adjustments will be calculated for a thermal QF that can be scheduled and or dispatched and any replacement power the Company is required to acquire to the extent the QF is scheduled but does not delivered power. In the case of an intermittent resource no line loss adjustment will be provided due to the fact that the energy can not be scheduled or dispatched and does not impose a cost or benefit when compared against the Proxy resource.

The calculation would be based on the physical proximity of the QF to both the proxy resource and the nearest load center.

The preliminary assessment would be based on the physical proximity of the QF to both the Proxy plant and the nearest load center and the voltage level at which the QF would be interconnected to the PacifiCorp system. For those QF projects interconnected at the transmission level, the loss factor percentage would be applied per the then current published PacifiCorp OATT rate, currently 4.5%. In the rare case it is interconnected at the distribution level, the distribution loss percentage would apply. If the QF, or a portion of the QF output has met the line loss applicability then either a credit or debt would be applied to the cost or benefit of the losses.

Example:

QF proxy unit delivery voltage: transmission 138 kV or higher - line losses 4.5%

Actual QF delivery voltage: 11.5kV - line loss equivalent - 6.5%. The benefit is the difference between the 6.5% and 4.5% = 2%

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.11

ICNU Data Request 13.11

Does PacifiCorp consider the generation and wholesale marketing of electricity to be a competitive business (see page 9, line 10 of PPL/407)? Please explain your response in detail.

Response to ICNU Data Request 13.11

The company considers wholesale marketing of electricity to be a competitive business. The company considers generation owned by a utility to be a regulated business, and generation not owned by a utility to be a competitive business.

ICNU Data Request 13.12

Assume that a utility files avoided cost rates that reflect a natural gas forecast price of \$4 per MMBtu over the next five years. Assume that these rates are fixed for that five-year period and are not indexed to gas prices. After one year, assume that natural gas prices increase to \$8 per MMBtu for the next four years.

- (a) Does PacifiCorp agree that it will be difficult for gas-fired QFs to develop projects in a world of \$8 gas when the avoided cost rates they will be paid are fixed based on \$4 gas?
- (b) What recourse would gas-fired QFs have to proceed with project development in such a scenario?

Response to ICNU Data Request 13.12

- (a) For the hypothetical example included in the question this answer would be yes. However, if the Company's actual avoided costs were reflective of \$4/MMBtu gas, it would be in PacifiCorp's customers' interest that the gas-fired QF projects not be developed because they would not be economic.
- (b) The QF could request that the utility update avoided cost to reflect current avoided costs. The QF could petition the Commission to order the Company to update avoided cost prices. In addition, the QF always has the option of selling their power on the wholesale market or selling their power as a QF to a different utility.

UM-1129/PacifiCorp

April 18, 2006

ICNU 13th Set Data Request 13.13

ICNU Data Request 13.13

Does PacifiCorp use the wholesale market price for firm energy as its avoided cost during the sufficiency period?

Response to ICNU Data Request 13.13

Yes, as ordered by the Oregon Commission in this docket (Order No. 05-584 dated May 13, 2005 – page 27), avoided costs during the sufficiency period are based on the Company's forward price curve.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.15

ICNU Data Request 13.15

If PacifiCorp purchases firm energy from a supplier in the day-ahead market, for delivery the next day, does that supplier have an obligation to deliver to PacifiCorp in the day after next?

Response to ICNU Data Request 13.15

No. A firm energy supplier has an obligation to supply the power only during the period that they have contracted to supply. . If they have not contracted to supply "in the day after next," they do not have an obligation to supply then.

UM-1129/PacifiCorp
April 18, 2006
ICNU 13th Set Data Request 13.16

ICNU Data Request 13.16

Does PacifiCorp include expected day-ahead purchases of firm energy in its load and resource position? If not, why not?

Response to ICNU Data Request 13.16

No. The company does not include expected day-ahead purchases in its load and resource position because these transactions are used to balance the system. It is not known in advance whether the company will be buying in the system balancing markets. Therefore, the company believes that it is inappropriate to include day-ahead transactions in the load and resource position.

Weyerhaeuser-ICNU/309

PGE Responses to
ICNU Data Requests

March 7, 2006

TO: Irion Sanger
Davison Van Cleve, P.C.

FROM: Doug Kuns
Manager, Pricing and Tariffs

**PORTLAND GENERAL ELECTRIC
UM-1129
PGE Response to ICNU Data Request 6.1
Dated February 21, 2006
Question 024**

Request:

What percentage of Portland General Electric Company's load is served by QF contracts?

Response:

Using data from PGE's 2004 FERC Form 1 the percentage of load served by QF generation is approximately 0.49%. This calculation is illustrated by the following table.

2004 PGE FERC Form 1 Line Item	MWh	Source
Sales to Ultimate Consumers	17,764,138	page 301 (d), line 10
Covanta Marion, QF83-118	84,748	Page 327.1 (g), line 7
Lake Oswego Corporation	566	Page 327.3 (g), line 1
Portland, City of, QF 83-448	501	Page 327.4 (g), line 5
Douglas Pagar	525	page 327.6 (g), line 1
Robert Migliori	7	page 327.6 (g), line 2
Von Land Co	191	page 327.6 (g), line 3
Minikahada Hydropower Company	353	page 327.6 (g), line 4
Haiku Software	2	page 327.6 (g), line 5
QF Total MWh	86,893	
QF Percentage of PGE Load	0.49%	

April 21, 2006

TO: Irion Sanger
Davison Van Cleve, P.C.

FROM: Doug Kuns
Manager, Pricing and Tariffs

**PORTLAND GENERAL ELECTRIC
UM 1129
PGE Response to ICNU Data Request 8.3
Dated April 11, 2006
Question 036**

Request:

Regarding the rebuttal testimony of Kuns-Sims at 6, please provide the methodology or explain how PGE would “reflect the value of the specific QF project’s power supply characteristics consistent with its legally enforceable obligations.”

Response:

See PGE’s response to ICNU Data Request No. 031. The value of power supply from a specific QF project would be primarily based on the value of the QF generation compared to the avoided resource.

April 21, 2006

TO: Irion Sanger
Davison Van Cleve, P.C.

FROM: Doug Kuns
Manager, Pricing and Tariffs

**PORTLAND GENERAL ELECTRIC
UM 1129
PGE Response to ICNU Data Request 8.5
Dated April 11, 2006
Question 038**

Request:

Regarding the rebuttal testimony of Kuns-Sims at 6, please identify some unique QF project characteristics or contract commitments that will influence the value, risk, and pricing of QF power.

Response:

See PGE Exhibit /400, Kuns-Sims/11 which refers to the factors affecting rates for purchases as set out by FERC in 18 CFR 292.304 (e). The factors describe power supply characteristics and contract commitments that will influence the pricing of a specific QF's delivered power.

April 21, 2006

TO: Irion Sanger
Davison Van Cleve, P.C.

FROM: Doug Kuns
Manager, Pricing and Tariffs

**PORTLAND GENERAL ELECTRIC
UM 1129
PGE Response to ICNU Data Request 8.9
Dated April 11, 2006
Question 042**

Request:

Can PGE provide a statement to a non-standard QF in writing why there is any deviation from the standard avoided costs?

Response:

PGE does not know the nature of the information the statement is intended to convey, the purpose of the statement or how providing a statement would affect timing for developing a contract, and therefore cannot state a position on the requirements and our ability to provide such a statement.

April 21, 2006

TO: Irion Sanger
Davison Van Cleve, P.C.

FROM: Doug Kuns
Manager, Pricing and Tariffs

**PORTLAND GENERAL ELECTRIC
UM 1129
PGE Response to ICNU Data Request 8.10
Dated April 11, 2006
Question 043**

Request:

Can PGE provide a statement to a non-standard QF in writing that has a quantitative basis for all deviations from the standard avoided costs?

Response:

PGE does not know the nature of the information the statement is intended to convey, the purpose of the statement or how providing a statement would affect timing for developing a contract, and therefore cannot state a position on the requirements and our ability to provide such a statement.

April 27, 2006

TO: Irion Sanger
Davison Van Cleve, P.C.

FROM: Doug Kuns
Manager, Pricing and Tariffs

**PORTLAND GENERAL ELECTRIC
UM 1129
PGE *First Supplemental* Response to ICNU Data Request 8.12
Dated April 11, 2006
Question 045**

Request:

Regarding the rebuttal testimony of Kuns-Sims at 8, does PGE currently have “flexibility in developing ... non-standard QF contract[s]?” Please explain.

Response:

PGE’s rebuttal testimony at 8 supports the testimony of Weyerhaeuser-ICNU that states QFs have unique needs. We support development of Commission policies that recognize the unique QF characteristics with the contracting process and avoided-cost pricing

First Supplemental Response:

Consistent with 18 C.F.R. Section 292.305, PGE currently has flexibility in developing non-standard QF contracts.

Weyerhaeuser-ICNU/310

Idaho Power Responses to
ICNU Data Requests

REQUEST ICNU 5.6:

Regarding the testimony of Gale-Allphin/9-11, Messrs. Gale and Allphin testify regarding the stochastic IRP model for setting avoided cost rates for large QFs. Please identify the number, size and type of each QF that has entered into a contract with Idaho Power with prices based on this stochastic IRP model.

IDAHO POWER'S RESPONSE TO REQUEST ICNU 5.6:

Idaho Power has utilized the IRP methodology on several occasions to develop avoided costs for negotiations with potential large QFs. To date Idaho Power has not entered into a contract with a large QF utilizing avoided cost rates determined using the IRP model. Idaho Power is aware that another electric utility in Idaho has utilized purchase prices developed by using the IRP model as the basis for negotiations with a large Idaho-sitused QF that eventually led to a contract with the large QF.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1129

In the Matter of)	
)	AFFIDAVIT OF R. THOMAS BEACH
PUBLIC UTILITY COMMISSION OF)	
OREGON)	
)	
Staff's Investigation Related to Electric Utility))	
Purchases from Qualifying Facilities.)	
_____)	

1 I, R. Thomas Beach, being first duly sworn on oath, depose and say:

2 1. My full name is Rodney Thomas Beach. I am principal consultant with the firm
3 Crossborder Energy. I am appearing in this proceeding as a witness for the Industrial Customers
4 of Northwest Utilities ("ICNU") and Weyerhaeuser Company. My business address is: 2560
5 Ninth Street, Suite 316, Berkeley, California 94710.

6 2. The matters set forth below are based on my personal knowledge, and I am
7 competent to testify to these facts.

8 3. I sponsored pre-filed testimony and exhibits on behalf of ICNU and
9 Weyerhaeuser Company in Oregon Public Utility Commission Docket No. UM 1129.
10 Specifically, my pre-filed direct testimony and exhibits (Weyerhaeuser-ICNU/300-303) were
11 filed on February 27, 2006. My pre-filed rebuttal testimony and exhibits (Weyerhaeuser-
12 ICNU/304-307) were filed on April 7, 2006. The errata page to my rebuttal testimony was filed
13 on May 5, 2006. Additional exhibits (Weyerhaeuser-ICNU/308-310) consisting of data
14 responses provided by the utilities are being filed concurrent with this affidavit.

15 4. My testimony and exhibits that were previously filed are true and accurate, and no
16 corrections need to be made. If I were asked the same questions today, my answers would be the
17 same.

1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 1st day of May, 2006, at Berkeley, CA.

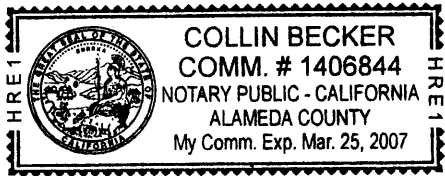
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R. Thomas Beach

8 R. THOMAS BEACH

9 SUBSCRIBED AND SWORN to before me this 1st day of May, 2006.

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[Signature]
NOTARY PUBLIC FOR CALIFORNIA

My Commission Expires: March 25, 2007