

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 219

In the Matter of)	
)	THE CITIZENS' UTILITY BOARD
)	OF OREGON'S MOTION TO
PACIFICORP, dba PACIFIC POWER)	ADMIT PREFILED TESTIMONY
Application to Implement the Provisions of)	AND DATA RESPONSES TO CUB
Senate Bill 76)	DATA REQUESTS 4, 5 AND 6
_____)	

CUB respectfully requests that the Administrative Law Judges admit CUB's Exhibits 100, 101, 102, 103, 104, and 105 into the record in the above captioned proceeding.

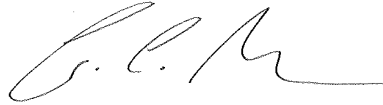
CUB Exhibits 100, 101 and 102 were previously filed with the Commission and are CUB's Testimony in this matter. An affidavit attesting to the truthfulness of the Testimony is attached to this motion.

CUB Exhibits 103, 104, and 105 are PacifiCorp Data Responses to Data Requests 4, 5 and 6 posed by CUB after receipt of PacifiCorp's Rebuttal Testimony. CUB has discussed submission of these Data Requests into the record with the Company, in lieu of CUB's pursuit of cross examination at hearing, in this matter. PacifiCorp has stated, through its attorneys, that it does not object to the entry of these Data Responses in this matter. CUB, therefore, submits Exhibits 103, 104, and 105, in lieu of the conduct of

cross examination in this matter by CUB, and respectfully requests the Commission also enter these Exhibits into the record.

DATED this 7th day of July, 2010.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. C. McCracken', written in a cursive style.

G. Catriona McCracken #933587
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UE-219/PacifiCorp
July 2, 2010
CUB Data Request 4

CUB Data Request 4

Refer to UE 219/PPL/203/Kelly/7-8, which compares how dam removal costs are allocated to how TAM costs are allocated between customer classes.

- a) Please explain how the Company currently allocates dam relicensing costs between customer classes on an Oregon basis.
- b) If the Klamath hydro facilities generated resale revenues, please explain how Oregon's share of those revenues would be allocated between customer classes.

Response to CUB Data Request 4

- a) Hydro relicensing costs are booked into FERC account 302 and functionalized 99 percent to the generation component and 1 percent to the transmission component of the jurisdictional revenue requirement. Functional revenue requirements are allocated to a particular class based on that class' share of total marginal costs for that function. The marginal cost of service class allocation factors for generation and transmission from the Company's most recent general rate case, UE 217, are shown in Attachment CUB 4. In line 3 of the attachment, a combined class allocation factor has been calculated based on 99 percent generation and 1 percent transmission. This combined factor shows how hydro relicensing costs would be allocated to the customer classes through a marginal cost of service study. This combined allocation factor is nearly identical to the generation allocation factor.
- b) The Company does not associate revenues with any specific generation resource. All sales for resale are booked into FERC account 447 and functionalized 78 percent to the generation component and 22 percent to the transmission component of the jurisdictional revenue requirement. Functional revenue requirements are allocated to a particular class based on that class' share of total marginal costs for that function. The marginal cost of service class allocation factors for generation and transmission from the Company's most recent general rate case, UE 217, are shown in Attachment CUB 4. In line 4 of the attachment, a combined class allocation factor has been calculated based on 78 percent generation and 22 percent transmission. This combined factor shows how sales for resale are allocated to the customer classes through a marginal cost of service study. This combined allocation factor is nearly identical to the generation allocation factor.

Please refer to non-confidential Attachment CUB 4 on the enclosed CD.

**Pacific Power
State of Oregon**

Cost of Service Class Allocation factors from UE 217

Line		Total	Residential	General Service		General Service		General Service			Large Power Service			Irrigation	Street Lgt.
			(sec)	Sch 23 (sec)	(pri)	Sch 28 (sec)	(pri)	Sch 30 (sec)	(pri)	(sec)	(pri)	(trn)	Sch 41	Sch 51, 53, 54	
1	Generation	100%	44%	8%	0%	16%	0%	10%	1%	5%	11%	3%	1%	0%	
2	Transmission	100%	46%	9%	0%	17%	0%	10%	1%	5%	10%	2%	1%	0%	

Combined Factors

3	99% Gen / 1% Trans	100%	44%	8%	0%	16%	0%	10%	1%	5%	11%	3%	1%	0%
4	78% Gen / 22% Trans	100%	44%	8%	0%	17%	0%	10%	1%	5%	11%	3%	1%	0%

Note: Not all rate schedule classes are included in the cost of service study (e.g., Schedule 47, Large General Service Partial Requirements)

UE-219/PacifiCorp
June 30, 2010
CUB Data Request 5

CUB Data Request 5

Assuming a given amount representing Oregon's share of costs associated with dam relicensing, what percentage of these costs would be allocated to each major customer class based on PacifiCorp's current methodology?

Response to CUB Data Request 5

A rate spread of dam relicensing costs, based on PacifiCorp's current methodology of rate spread based on generation revenues, would result in the following percentage of the relicensing costs being applied to each of the major customer classes:

Schedule 4 (Res)	42%
Schedule 23	8%
Schedule 28	16%
Schedule 30	11%
Schedule 47 + Schedule 48	21%
Schedule 41	1%

UE-219/PacifiCorp
June 30, 2010
CUB Data Request 6

CUB Data Request 6

Assuming a given amount slated to be spent on dam removal, what percentage of Oregon's share of these costs would be allocated to each major customer class based on an equal percentage methodology, as described in UE 219/PPL/203/Kelly/8, line 9-12?

Response to CUB Data Request 6

A rate spread of dam removal costs based on an equal percentage increase would result in the following percentage of the removal costs being applied to each of the major customer classes:

Schedule 4 (Res)	50%
Schedule 23	9%
Schedule 28	15%
Schedule 30	9%
Schedule 47 + Schedule 48	15%
Schedule 41	1%

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 219

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	AFFIDAVIT OF GORDON
Application to Implement the Provisions of)	FEIGHNER
Senate Bill 76)	
_____)	

I, Gordon Feighner, being duly sworn on oath, depose and say:

1. My name is Gordon Feighner. I am the Utility Analyst for the Citizens' Utility Board of Oregon (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 308, Portland, Oregon, 97205.
2. I sponsored pre-filed testimony and exhibits 100 through 102 on behalf of CUB.
3. My testimony and exhibits that were previously filed are true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.
4. CUB Exhibits 103, 104, and 105 are PacifiCorp Data Responses to Data Requests 4, 5 and 6 posed by CUB after receipt of PacifiCorp's Rebuttal Testimony. CUB has discussed submission of these Data Requests into the record with the Company, in lieu of CUB's pursuit of cross examination at hearing, in this matter. PacifiCorp has stated, through its attorneys, that it does not object to the entry of these Data Responses in this matter. CUB, therefore, submits Exhibits 103, 104, and 105, in lieu of the conduct of

cross examination in this matter by CUB, and respectfully requests the Commission also enter these Exhibits into the record.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF OREGON THAT THE FOREGOING IS TRUE AND CORRECT BASED ON MY INFORMATION AND BELIEF.

Signed this 7th day of July, 2010.

Gordon Feighner

Subscribed and sworn to before me this 7th day of July, 2010.

Signed: _____

Printed: _____

My Commission expires: _____

UE 219 – CERTIFICATE OF SERVICE

I hereby certify that, on this 7th day of July, 2010, I served the foregoing **THE CITIZENS' UTILITY BOARD OF OREGON'S MOTION TO ADMIT PREFILED TESTIMONY AND DATA RESPONSES TO CUB DATA REQUESTS 4, 5 AND 6** in docket UE 219 upon each party listed in the UE 219 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending 2 copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

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**(C denotes service of
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