

McDowell Rackner & Gibson PC



AMIE JAMIESON
Direct (503) 595-3927
amie@mcd-law.com

April 22, 2011

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 1050

Enclosed for filing in the above docket are an original and five copies of the Stipulation. The Joint Testimony in Support of Stipulation will be filed on Monday, April 25, 2011. Each party will file affidavits supporting their testimony by May 2, 2011.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Amie Jamieson".

Amie Jamieson

Enclosure
cc: Service List

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of the foregoing document in
3 Docket UM 1050 on the following named person(s) on the date indicated below by email
4 and first-class mail addressed to said person(s) at his or her last-known address(es)
5 indicated below.

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Gordon Feighner
Citizens' Utility Board of Oregon
Gordon@oregoncub.org

Robert Jenks
Citizens' Utility Board of Oregon
bob@oregoncub.org

G. Catriona McCracken
Citizens' Utility Board of Oregon
catriona@oregoncub.org

Raymond Myers
Citizens' Utility Board of Oregon
Ray@oregoncub.org

John C. Sturm
Citizens' Utility Board of Oregon
John@oregoncub.org

Irion Sanger
Davison VanCleve PC
333 SW Taylor, Suite 400
Portland, OR 97204
ias@dvclaw.com

Melinda J. Davison
Davison Van Cleve, PC
333 SW Taylor, Suite 400
Portland, OR 97204
mail@dvclaw.com

Donald W. Schoenbeck
Regulatory & CoGeneration Services Inc.
900 Washington St. Suite 780
Vancouver, WA 98660-3455
dws@r-c-s-inc.com

V. Denise Saunders
Portland General Electric
121 SW Salmon Street, 1 WTC1301
Portland, OR 97204
Denise.saunders@pgn.com

Patrick G. Hager
Portland General Electric
121 SW Salmon Street, 1 WTC0702
Portland, OR 97204
Pge.opuc.filings@pgn.com

Michael Early
Industrial Customers of NW Utilities
1300 SW 5TH Ave. Ste. 1750
Portland, OR 97204-2446
mearly@icnu.org


Steven Weiss
Northwest Energy Coalition
4422 Oregon Trail Ct. NE
Salem, OR 97305
steve@nwenergy.org

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Stephanie S. Andrus
Department of Justice
Regulated Utility & Business Section
1162 Court St. NE
Salem, OR 97301-4096
Stephanie.andrus@state.or.us

Marc Hellman
Oregon Public Utility Commission
P.O. Box 2148
Salem, OR 97308-2148
Marc.hellman@state.or.us

DATED: April 22, 2011


Amie Jamieson

Of Attorneys for PacifiCorp

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

3 **UM 1050**

4 In the Matter of the Application of
5 PACIFICORP for an Investigation of Inter-
6 Jurisdictional Issues

STIPULATION

7
8 Parties to this case have entered into a Stipulation for the purpose of resolving the
9 issues related to PacifiCorp's Petition for Approval of Amendments to Revised Protocol
10 Allocation Methodology.

11 **PARTIES**

12 1. The parties to this Stipulation are PacifiCorp, Staff of the Public Utility
13 Commission of Oregon (Staff), Citizens' Utility Board of Oregon (CUB), and the Industrial
14 Customers of Northwest Utilities (ICNU) (together, the Parties). This Stipulation will be made
15 available to the other parties to this docket, who may participate by signing and filing a copy of
16 the Stipulation.¹

17 **BACKGROUND**

18 2. On January 12, 2005, the Oregon Public Utility Commission (Commission)
19 issued Order No. 05-021 in this docket ratifying the Revised Protocol inter-jurisdictional cost
20 allocation methodology and adopting a Stipulation among PacifiCorp, Staff, CUB, (collectively
21 the Oregon Parties) and AARP (2004 Stipulation). ICNU opposed the Stipulation.

22 3. The 2004 Stipulation included certain statements that explicitly recognized the
23 expectations of and trade-offs by parties in reaching agreement to support the Revised
24 Protocol.² Specifically, the 2004 Stipulation contained the following sections:

25 _____
26 ¹ Northwest Energy Coalition and Portland General Electric Company are the only other parties to this docket. They did not file reply testimony and did not participate in settlement discussions.

² ICNU remains opposed the 2004 Stipulation, including paragraphs 4 and 5 cited below.

1 4. Throughout this proceeding, Oregon Parties have made clear the
2 importance of maintaining the Hydro-Electric Resources and Mid-Columbia
3 Contracts for Northwest citizens. An allocation of these Resources to Oregon
4 that is less than that contemplated by the Revised Protocol is not acceptable to
5 Oregon Parties. In order to secure the allocation of the Mid-Columbia
6 Contracts that is contemplated in the Revised Protocol, Oregon Parties have
7 accepted the allocation of the costs of Existing QF Contracts that is
8 contemplated in the Revised Protocol.

9 5. The parties to this Stipulation recognize that there is uncertainty regarding
10 the future value of the Mid-Columbia Contracts and that it is possible that,
11 during the remaining term of the Existing QF Contracts, the costs to Oregon
12 customers associated with the contemplated allocation of Existing QF
13 Contracts will exceed the benefits of the contemplated allocation of Mid-
14 Columbia Contracts. However, the Oregon Parties are prepared to assume this
15 risk because they expect that the contemplated allocation of Mid-Columbia
16 Contracts will continue to provide long-term benefits to Oregon customers after
17 the expiration of the Existing QF Contracts. Similarly, the parties to this
18 Stipulation recognize that the addition of relicensing costs to the Company's
19 ratebase may cause the Hydro-Electric Resources to be more costly than other
20 market opportunities in the near term, but Oregon Parties are willing to accept
21 responsibility for these higher near-term costs in the expectation that, as the
22 relicensing costs are depreciated, Hydro-Electric Resources will yield long-term
23 benefits to Oregon customers. For the foregoing reasons, it is critical to Oregon
24 Parties that their entitlement to Hydro-Electric Resources and Mid-Columbia
25 Contracts not be abridged at any time in the future.³

26 4. On September 15, 2010, PacifiCorp filed a Petition for Approval of Amendments
to Revised Protocol Allocation Methodology (Petition). The Petition was accompanied by
direct testimony of Andrea L. Kelly, Steven R. McDougal, and Gregory N. Duvall, and
supporting exhibits. In the Petition, the Company requested that the Commission approve
amendments to the Revised Protocol, the method by which PacifiCorp's costs are allocated
among its six jurisdictions that was approved by the Commission on January 12, 2005. The
proposed amendments reflected an agreement in principle reached by the Multi-State Process
(MSP) Standing Committee⁴ known as the "2010 Protocol."

³ In the Matter of the Application of PacifiCorp for an Investigation of Inter-Jurisdictional Issues, Docket
UM 1050, Order No. 05-021, Stipulation at 2 (Jan. 12, 2005).

⁴ The MSP Standing Committee was established by Section XIII.B of the Revised Protocol. The MSP
Standing Committee monitors and discusses inter-jurisdictional allocation issues facing PacifiCorp
and its customers and seeks resolution of these issues.

1 use in all PacifiCorp general rate case filings in Oregon that are filed on or before December
2 31, 2016. The Parties further agree that for all general rate case filings subsequent to
3 December 31, 2016, PacifiCorp will utilize the Revised Protocol allocation methodology,
4 absent formal action by the Commission to adopt an alternate allocation methodology for
5 Oregon.

6 12. Calculation of the Hydro Embedded Cost Differential (ECD) and the Klamath
7 Surcharge Adjustment: The Parties agree that, for ratemaking purposes, the two adjustments
8 in the 2010 Protocol, Hydro ECD and Klamath Surcharge, will not be based on the six-year,
9 fixed levelized approach as proposed in the Company's Petition. Instead, the adjustments will
10 reflect test period cost elements for purposes of rate filings, and historic and pro forma cost
11 elements for purposes of regulatory reporting. Attachment 1 to this Stipulation details the
12 impact of the Stipulation on the 2010 Protocol and its accompanying Appendix A – Defined
13 Terms. The Hydro ECD and Klamath Surcharge adjustments will be allocated to Oregon as
14 illustrated in Attachment 2 to this Stipulation.

15 For the duration of the 2010 Protocol: a) the Company's general rate case filings filed
16 with the Commission shall include calculations of the Company's Oregon revenue requirement
17 under both the 2010 Protocol and the Revised Protocol; and b) the Company's annual results
18 of operations with the Commission shall include calculations of the Company's Oregon
19 allocated results of operations under both the 2010 Protocol and Revised Protocol. All such
20 submittals shall include and adequately explain all adjustments, assumptions, work papers
21 and spreadsheet models used by the Company in its calculations. While the Parties agree
22 that a comparison to other allocation methodologies is not necessary for these purposes, the
23 Parties reserve the right to request comparisons against the Modified Accord allocation
24 methodology in the future. This in no manner impacts a Party's discovery rights. The
25 Company agrees to maintain the capability to provide results under the Modified Accord
26 methodology and the Parties agree to work in good faith to provide requested results in a

1 reasonable timeframe. The Parties agree that it is not necessary for the Company to maintain
2 models related to the Hybrid allocation methodology.

3 13. Rate Protection Mechanisms: In order to mitigate risks associated with the
4 potential rate impacts on Oregon customers, for all Company general rate case filings filed
5 prior to December 31, 2016, the increase in the Oregon total revenue requirement (as finally
6 determined by the Commission in each proceeding) as a result of the implementation of the
7 2010 Protocol shall be capped at 0.30 percent of the Company's Oregon revenue requirement
8 calculated under the Revised Protocol (as modified in Attachment 2 to this Stipulation).

9 Because the differences between Revised Protocol and the 2010 Protocol are related to the
10 allocation of generation costs, in all cost of service studies performed by the parties, any
11 change in Oregon's revenue requirement attributable to the cap will be applied to each
12 customer class based on each class' relative share of marginal generation costs after it has
13 been reconciled to the embedded revenue requirement.

14 14. Deferral of 2011 Forecast Difference: The Parties agree that PacifiCorp will file
15 an application to defer a \$2.3 million credit to Oregon customers related to the forecast
16 difference for calendar year 2011 between Oregon's revenue requirement under the 2010
17 Protocol and the Revised Protocol. The deferral application will be made concurrent with the
18 filing of the Stipulation, and interest will accrue, consistent with Commission policy, at the
19 Company's weighted average cost of capital until amortization of the balance is authorized by
20 the Commission. The Parties agree that the credit should be allocated to all rate schedules
21 based on each schedule's proportion of present generation revenues under Schedules 200
22 and 201, and amortization of the credit should begin no later than January 1, 2012. The
23 allocation across rate schedules should be the same shape as the revenue allocation in the
24 Company's Transition Adjustment Mechanism proceeding.

25 15. Analysis of Alternate Allocation Options: In anticipation of the expiration of the
26 use of the 2010 Protocol after December 31, 2016, the Parties agree to engage in discussions

1 starting in 2013 with other interested persons and, as appropriate, in conjunction with the MSP
2 Standing Committee and applicable workgroups regarding appropriate allocation options for
3 2017 and beyond. As part of these discussions the Company, in consultation with the other
4 stakeholders, will perform cost causation studies related to classification and allocation of
5 costs, including appropriate demand/energy weighting for generation costs, and a
6 comprehensive evaluation of the costs and benefits of structural separation and other
7 allocation options such as the Rolled-In allocation methodology. The Parties also agree to
8 undertake preparatory discussions beginning in 2012.

9 16. Class 1 Demand-Side Management (DSM) Programs: The Parties agree that
10 the emerging issues related to the allocation of Class 1 DSM programs are not yet ripe for
11 Commission action. The Parties agree that additional analysis and discussion of these issues
12 should be undertaken in the MSP Standing Committee workgroup, and the Parties will
13 endeavor to participate in the workgroup efforts to the extent possible. The Parties shall
14 encourage the workgroup to develop a proposed resolution on these issues by the next MSP
15 Commissioners' Forum. The Parties understand that the Company may make a subsequent
16 filing with the Commission to address this discrete issue. All Parties may take any position
17 they deem appropriate in response to this filing, if it occurs. The Parties agree that the
18 revenue requirement impact of changes adopted by the Commission in the future related to
19 Class 1 DSM programs, if any, will not be limited by the rate protection mechanisms contained
20 in Paragraph 13 of this Stipulation.

21 17. Intervenor Funding Agreement: To allow for full participation by CUB and ICNU
22 in the ongoing MSP Standing Committee workgroup efforts, as well as the comprehensive
23 multi-state effort outlined in Paragraph 15, the Parties support an additional Intervenor
24 Funding Agreement (IFA). This additional IFA does not impact the current IFA approved in
25 Order No. 07-564. Upon approval of this Stipulation, Parties agree to work cooperatively to
26 develop an additional IFA. CUB and ICNU agree to bear the burden of supporting the

1 requested level of increased funding, and all requested budgets and recovery would remain
2 subject to Commission approval. In the event the Commission rejects the request for an
3 additional IFA, the Parties agree to meet to discuss alternatives for funding for CUB's and
4 ICNU's participating in the MSP Standing Committee workgroup efforts and the
5 comprehensive multi-state effort outlined in Paragraph 15.

6 18. Reservation of Rights: As provided for in Section XIII C of the 2010 Protocol, a
7 party's initial support of the 2010 Protocol will not bind that party in the event that unforeseen
8 or changed circumstances cause that party to conclude that the 2010 Protocol no longer
9 produces just and reasonable results. Should the benefits or detriments to Oregon customers
10 of the contemplated allocations in the 2010 Protocol, or any amended version of the 2010
11 Protocol recommended by the MSP Standing Committee, no longer produce results that are
12 just, reasonable, and in the public interest, any party to this Stipulation may propose
13 amendments to the 2010 Protocol or propose to the Commission that the Commission depart
14 from its terms, so as to produce results that are just, reasonable, and in the public interest.

15 19. Notwithstanding the status of the 2010 Protocol as an inter-jurisdictional cost
16 allocation method, if PacifiCorp, Staff, or CUB proposes a material change to the allocation
17 methodology for Hydro-Electric Resources and Mid-Columbia Contracts, the proposed change
18 will be consistent with the trade-off contained in the Revised Protocol between near-term
19 negative impacts of Existing QF Contracts and long-term positive impacts of Mid-Columbia
20 Contracts and the potential near-term costs and long-term benefits of Hydro-Electric
21 Resources as described in Sections 4 and 5 of the 2004 Stipulation excerpted above.

22 20. Unless otherwise recommended by the MSP Standing Committee, as long as
23 CUB, ICNU, and Staff continue to support the use of the 2010 Protocol or the Revised
24 Protocol for purposes of establishing PacifiCorp's Oregon revenue requirement, PacifiCorp
25 will not propose or advocate any material change in the Protocol provisions relating to Hydro-
26 Electric Resources. Provided, however, the foregoing provision shall not prevent PacifiCorp

1 from complying with any Commission order. Staff, CUB, and ICNU reserve all rights to object
2 to recommendations of the MSP Standing Committee.

3 21. This Stipulation will be offered into the record as evidence pursuant to OAR 860-
4 001-0350(7). The Parties agree to support this Stipulation throughout this proceeding and any
5 appeal, provide witnesses to sponsor this Stipulation at hearing, if needed, and recommend
6 that the Commission issue an order adopting the Stipulation.

7 22. If this Stipulation is challenged by any other party to this proceeding, the Parties
8 agree that they will continue to support the Commission's adoption of the terms of this
9 Stipulation. The Parties reserve the right to cross-examine witnesses and put in such
10 evidence as they deem appropriate to respond fully to the issues presented including the right
11 to raise issues that are incorporated in the settlements embodied in this Stipulation.

12 23. The Parties have negotiated this Stipulation as an integrated document. If the
13 Commission rejects all or any material portion of this Stipulation or imposes additional material
14 conditions in approving this Stipulation, any Party shall have the rights provided in OAR 860-
15 001-0350(9), including the right to present evidence and argument on the record in support of
16 the Stipulation or to withdraw from the Stipulation, and shall be entitled to seek
17 reconsideration pursuant to OAR 860-001-0720.

18 24. By entering into this Stipulation, no Party shall be deemed to have approved,
19 admitted, or consented to the facts, principles, methods, or theories employed by any other
20 Party in arriving at the terms of this Stipulation, other than as specifically identified in the body
21 of this Stipulation. No Party shall be deemed to have agreed that any provision of this
22 Stipulation is appropriate for resolving issues in any other proceeding, except as specifically
23 identified in this Stipulation.

24 25. This Stipulation may be executed in counterparts and each signed counterpart
25 shall constitute an original document.

26

1 This Stipulation is entered into by each Party on the date entered below such Party's
2 signature.

3

4

STAFF

CUB

5

By: *Man Keller*

By: _____

6

Date: Apr. 22, 2011

Date: _____

7

8

ICNU

PACIFICORP

9

By: _____

By: _____

10

Date: _____

Date: _____

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

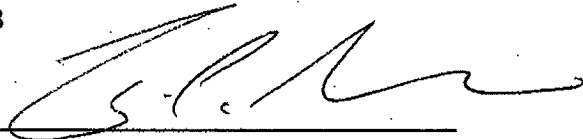
26

1 This Stipulation is entered into by each Party on the date entered below such Party's
2 signature.

3
4 STAFF

CUB

5 By: _____

6 By:  _____

7 Date: _____

8 Date: 4-22-11 _____

9
10 ICNU

PACIFICORP

11 By: _____

12 By: _____

13 Date: _____

14 Date: _____

1 This Stipulation is entered into by each Party on the date entered below such Party's
2 signature.

3

4 STAFF

CUB

5

6 By: _____

By: _____

7

8 Date: _____

Date: _____

9

10 ICNU

PACIFICORP

11

12 By: *M. L. J. [Signature]*

By: _____

13

14 Date: *April 22, 2011*

Date: _____

15

16

17

18

19

20

21

22

23

24

25

26

1 This Stipulation is entered into by each Party on the date entered below such Party's
2 signature.

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

STAFF

CUB

By: _____

By: _____

Date: _____

Date: _____

ICNU

PACIFICORP

By: _____

By: Andrea Kelly

Date: _____

Date: 4/22/11 *J*

**UM 1050
ATTACHMENT 1
to the Stipulation**

Modifications to the 2010 Protocol

The following redline changes to Section IV A of the 2010 Protocol (Exhibit PPL/101, pages 3-6), and Appendix A – Defined Terms (Exhibit PPL/101, pages 17-18), detail the impact of the proposed modifications to the two adjustments in the 2010 Protocol (Stipulation Paragraph 12). The Hydro embedded cost differential adjustment and the Klamath Surcharge adjustment, will not be based on the six-year, fixed levelized approach. Instead, the adjustments will reflect test period cost elements for purposes of rate filings, and historic and pro forma cost elements for purposes of regulatory reporting.

2010 Protocol

1 **IV. Allocation of Resource Costs and Wholesale Revenues**

2 **A. Regional Resources**

3 Costs associated with Regional Resources will be assigned and
4 allocated as follows:

5 1. Hydro-Endowment.

6 a. Owned Hydro Embedded Cost Differential

7 Adjustment. The Owned Hydro Embedded Cost
8 Differential Adjustment is calculated as follows:

- 9 • ~~The Forecasted Annual Embedded Costs – Hydro-~~
10 ~~Electric Resources, less the Forecasted Annual~~
11 ~~Embedded Costs – Pre-2005 Resources, multiplied~~
12 ~~by the normalized MWh’s of output from the~~
13 ~~Hydro-Electric Resources.~~
- 14 • ~~The calculation is made using forecasted~~
15 ~~information contained in the Company’s Baseline~~
16 ~~Study (finalized in March 2010) for calendar years~~
17 ~~2011 through 2016.~~

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

- The forecasted differential is allocated on the DGP factor and the inverse amount is allocated on the SG factor to compute State specific amounts for calendar years 2011 through 2016.
- The net present value of the forecasted differential by State is set at a fixed dollar level that will be used for all PacifiCorp rate proceedings filed prior to January 1, 2017.

b. Mid-Columbia Contract Embedded Cost Differential Adjustment. The Mid-Columbia Contract Embedded Cost Differential Adjustment is calculated as follows:

- The Forecasted Annual Mid-Columbia Contracts Costs, less the Forecasted Annual Embedded Costs – Pre-2005 Resources, multiplied by the normalized MWh’s of output from the Mid-Columbia Contracts (Mid-C less All Other).
- The calculation is made using forecasted information contained in the Company’s Baseline Study (finalized in March 2010) for calendar years 2011 through 2016.
- The forecasted allocation of Mid-Columbia Contracts to each State is established pursuant to Appendix F. The forecasted Mid-Columbia differential is allocated on the MC factor and the inverse amount is allocated on the SG factor to compute State specific amounts for calendar years 2011 through 2016.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

~~• The net present value of the forecasted differential by State is set at a fixed dollar level that will be used for all PacifiCorp rate proceedings filed prior to January 1, 2017.~~

~~The results of the Owned Hydro Embedded Cost Differential calculation and the Mid-Columbia Contract Embedded Cost Differential calculation are added together and a levelized annual value for the calendar years 2011 through 2016 time period is calculated. The levelized Hydro Endowment is fixed for purposes of ratemaking for that time period.~~

2. Klamath Hydroelectric Settlement Agreement (KHSA). As part of future ratemaking proceedings, the Company will include the full impact of the KHSA as a system cost in unadjusted results.

a. Klamath Dam Removal Surcharge Adjustment. The Klamath Dam Removal Surcharge is re-allocated to Oregon (92 percent) and California (8 percent) as follows:

• Each State’s initial allocated share of the Klamath Dam Removal Surcharge is reversed and assigned to Oregon and California on a situs basis. The calculation is made using forecasted annual information contained in the Company’s results of operations. ~~Baseline Study (finalized in March 2010)~~ for calendar years 2011 through 2016.

~~• The net present value of the forecasted adjustment by State is set at a fixed dollar level that will be used for all PacifiCorp rate proceedings filed prior to January 1,~~

1
2
3

~~2017. The levelized annual value for the calendar
years 2011 through 2016 time period will be used for
purposes of ratemaking for that time period.~~

2010 Protocol - Appendix A

Defined Terms

1 **~~“Forecasted Annual Embedded Costs – Hydro-Electric Resources”~~**

2 means PacifiCorp’s total ~~forecasted test period¹ normalized annual~~ production costs
3 contained in the Company’s Baseline Study, for calendar years 2011 through 2016,
4 expressed in dollars per MWh, associated with Hydro-Electric Resources as recorded
5 in the FERC Accounts listed in Appendix E to the 2010 Protocol.

6 **~~“Forecasted Annual Embedded Costs – Pre-2005 Resources”~~** means

7 PacifiCorp’s total ~~forecasted test period¹ normalized annual~~ production costs of Pre-
8 2005 Resources contained in the Company’s Baseline Study, for calendar years 2011
9 through 2016, expressed in dollars per MWh, other than costs associated with
10 Hydro-Electric Resources, and Mid-Columbia Contracts, as recorded in the FERC
11 Accounts listed in Appendix E to the 2010 Protocol.

12 **~~“Forecasted Annual Mid-Columbia Contract Costs”~~** means the total

13 ~~forecasted test period¹ net costs incurred by PacifiCorp contained in the Company’s~~
14 ~~Baseline Study, for calendar years 2011 through 2016, expressed in dollars per~~
15 MWh, under the Mid-Columbia Contracts.

¹ Test period costs will vary based on the test period and the costs that are used by parties to calculate the Company’s revenue requirement. Test period costs would therefore reflect adjustments made by parties to the Company’s filed case. The final test period costs that would be used to set rates would be based on the test period and costs approved by Commission order.

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		Allocation Factor			
Sales to Ultimate Customers					
440	Residential Sales				
	Direct assigned - Jurisdiction	S	S	S	S
442	Commercial & Industrial Sales				
	Direct assigned - Jurisdiction	S	S	S	S
444	Public Street & Highway Lighting				
	Direct assigned - Jurisdiction	S	S	S	S
445	Other Sales to Public Authority				
	Direct assigned - Jurisdiction	S	S	S	S
448	Interdepartmental				
	Direct assigned - Jurisdiction	S	S	S	S
447	Sales for Resale				
	Direct assigned - Jurisdiction	S	S	S	S
	Non-Firm	SE	SE	SE	SE
	Firm	SG	SG	SG	SG
449	Provision for Rate Refund				
	Direct assigned - Jurisdiction	S	S	S	S
		SG	SG	SG	SG
Other Electric Operating Revenues					
450	Forfeited Discounts & Interest				
	Direct assigned - Jurisdiction	S	S	S	S
451	Misc Electric Revenue				
	Direct assigned - Jurisdiction	S	S	S	S
	Other - Common	SO	SO	SO	SO
453	Water Sales				
	Common	N/A	SG	SG	SG
454	Rent of Electric Property				
	Direct assigned - Jurisdiction	S	S	S	S
	Common	SG	SG	SG	SG
	Other - Common	N/A	SO	SO	SO
456	Other Electric Revenue				
	Direct assigned - Jurisdiction	S	S	S	S
	Wheeling Non-firm, Other	SE	SE	SE	SE
	Common	SO	SO	SO	SO
	Wheeling - Firm, Other	SG	SG	SG	SG
	Customer Related	N/A	CN	CN	CN
Miscellaneous Revenues					
41160	Gain on Sale of Utility Plant - CR				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General Office	SO	SO	SO	SO
41170	Loss on Sale of Utility Plant				

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
			<u>Allocation Factor</u>		
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General Office	SO	SO	SO	SO
4118	Gain from Emission Allowances				
	SO2 Emission Allowance sales	SE	SE	SE	SE
41181	Gain from Disposition of NOX Credits				
	NOX Emission Allowance sales	SE	SE	SE	SE
421	(Gain) / Loss on Sale of Utility Plant				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General Office	SO	SO	SO	SO
	Customer Related	N/A	CN	CN	CN
Miscellaneous Expenses					
4311	Interest on Customer Deposits				
	Customer Service Deposits	CN	CN	CN	CN
	Direct assigned - Jurisdiction	N/A	S	S	S
Steam Power Generation					
500, 502, 504-514	Operation Supervision & Engineering				
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
501	Fuel Related				
	Steam Plants	SE	SE	SE	SE
	Peaking Plants*	SSECT	SSECT	N/A	N/A
	Cholla*	SSECH	SSECH	N/A	N/A
503	Steam From Other Sources				
	Steam Royalties	SE	SE	SE	SE
Nuclear Power Generation					
517 - 532	Nuclear Power O&M				
	Nuclear Plants	SG	SG	SG	SG
Hydraulic Power Generation					
535 - 545	Hydro O&M				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
Other Power Generation					
546, 548-554	Operation Super & Engineering				
	Other Production Plant	SG	SG	SG	SG
	Peaking Plants*	N/A	SSGCT	N/A	N/A
547	Fuel				
	Other Fuel Expense	SE	SE	SE	SE
	Peaking Plants*	N/A	SSECT	N/A	N/A
Other Power Supply					
555	Purchased Power				

UM 1050

**Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
			<u>Allocation Factor</u>		
	Direct assigned - Jurisdiction	S	S	S	S
	Firm	SG	SG	SG	SG
	Non-firm	SE	SE	SE	SE
	100 MW Hydro Extension	SG	N/A	N/A	N/A
	Seasonal Contracts	SSGC	SSGC	N/A	N/A
556	System Control & Load Dispatch				
	Other Expenses	SG	SG	SG	SG
557	Other Expenses				
	Direct assigned - Jurisdiction	N/A	S	S	S
	Other Expenses	SG	SG	SG	SG
	Cholla Transaction	N/A	SGCT	SGCT	SGCT
	Klamath Dam Removal Surcharge	N/A	S	SG	SG
	Embedded Cost Differential Endowments				
	Company Owned Hydro ECD (Hydro less All Other)	DGP	DGP	N/A	N/A
	Company Owned Hydro ECD (All Other less Hydro)	SG	SG	N/A	N/A
	Mid-Columbia Contract ECD (Mid C less All Other)	MC	MC	N/A	N/A
	Mid-Columbia Contract ECD (All Other less Mid C)	SG	SG	N/A	N/A
	Existing QF Contracts ECD (QF less- All Other)	S	S	N/A	N/A
	Existing QF Contracts ECD (All Other less QF)	SG	SG	N/A	N/A
	Fixed-Levelized 2010 Protocol Adjustments				
	Hydro Endowment	N/A	N/A	S	N/A
	Klamath Dam Removal Surcharge Re-allocation	N/A	N/A	S	N/A
	Non-Levelized 2010 Protocol Embedded Cost Differential and Adjustment				
	Company Owned Hydro ECD (Hydro less Pre-2005 All Other)	N/A	N/A	DGP	N/A
	Company Owned Hydro ECD (Pre-2005 All Other less Hydro)	N/A	N/A	SG	N/A
	Mid-Columbia Contract ECD (Mid C less Pre-2005 All Other)	N/A	N/A	MC	N/A
	Mid-Columbia Contract ECD (Pre-2005 All Other less Mid C)	N/A	N/A	SG	N/A
	Klamath Dam Removal Surcharge Re-allocation	N/A	N/A	S	N/A
TRANSMISSION EXPENSE					
560-564, 566-573	Transmission O&M				
	Transmission Plant	SG	SG	SG	SG
565	Transmission of Electricity by Others				
	Firm Wheeling	SG	SG	SG	SG
	Non-Firm Wheeling	SE	SE	SE	SE
DISTRIBUTION EXPENSE					
580 - 598	Distribution O&M				
	Direct assigned - Jurisdiction	S	S	S	S
	Other Distribution	SNPD	SNPD	SNPD	SNPD
CUSTOMER ACCOUNTS EXPENSE					
901 - 905	Customer Accounts O&M				
	Direct assigned - Jurisdiction	S	S	S	S
	Total System Customer Related	CN	CN	CN	CN
CUSTOMER SERVICE EXPENSE					
907 - 910	Customer Service O&M				
	Direct assigned - Jurisdiction	S	S	S	S

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		<u>Allocation Factor</u>			
	Total System Customer Related	CN	CN	CN	CN
SALES EXPENSE					
911 - 916	Sales Expense O&M				
	Direct assigned - Jurisdiction	S	S	S	S
	Total System Customer Related	CN	CN	CN	CN
ADMINISTRATIVE & GEN EXPENSE					
920-935	Administrative & General Expense				
	Direct assigned - Jurisdiction	S	S	S	S
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	FERC Regulatory Expense	SG	SG	SG	SG
DEPRECIATION EXPENSE					
403SP	Steam Depreciation				
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
403NP	Nuclear Depreciation				
	Nuclear Plant	SG	SG	SG	SG
403HP	Hydro Depreciation				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
403OP	Other Production Depreciation				
	Other Production Plant	SG	SG	SG	SG
	Peaking Plants*	N/A	SSGCT	N/A	N/A
403TP	Transmission Depreciation				
	Transmission Plant	SG	SG	SG	SG
403	Distribution Depreciation Direct assigned - Jurisdiction				
	Land & Land Rights	S	S	S	S
	Structures	S	S	S	S
	Station Equipment	S	S	S	S
	Storage Battery Equipment	N/A	S	S	S
	Poles & Towers	S	S	S	S
	OH Conductors	S	S	S	S
	UG Conduit	S	S	S	S
	UG Conductor	S	S	S	S
	Line Trans	S	S	S	S
	Services	S	S	S	S
	Meters	S	S	S	S
	Inst Cust Prem	S	S	S	S
	Leased Property	S	S	S	S
	Street Lighting	S	S	S	S

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
403GP	General Depreciation				
	Distribution	S	S	S	S
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Mining	N/A	SE	SE	SE
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General SO	SO	SO	SO	SO
403MP	Mining Depreciation				
	Remaining Mining Plant	SE	SE	SE	SE
AMORTIZATION EXPENSE					
404GP	Amort of LT Plant - Capital Lease Gen				
	Direct assigned - Jurisdiction	S	S	S	S
	General	SO	SO	SO	SO
	Customer Related	CN	CN	CN	CN
404SP	Amort of LT Plant - Cap Lease Steam				
	Steam Production Plant	SG	SG	SG	SG
404IP	Amort of LT Plant - Intangible Plant				
	Distribution	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General	SO	SO	SO	SO
	Mining Plant	SE	SE	SE	SE
	Customer Related	CN	CN	CN	CN
	Cholla*	N/A	SSGCH	N/A	N/A
404MP	Amort of LT Plant - Mining Plant				
	Mining Plant	SE	SE	SE	SE
404HP	Amortization of Other Electric Plant				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
405	Amortization of Other Electric Plant				
	Direct assigned - Jurisdiction	S	S	S	S
406	Amortization of Plant Acquisition Adj				
	Direct assigned - Jurisdiction	S	S	S	S
	Production Plant	SG	SG	SG	SG
407	Amort of Prop Losses, Unrec Plant, etc				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Trojan	TROJP	TROJP	TROJP	TROJP

UM 1050

**Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		<u>Allocation Factor</u>			
Taxes Other Than Income					
408	Taxes Other Than Income				
	Direct assigned - Jurisdiction	S	S	S	S
	Property	GPS	GPS	GPS	GPS
	System Taxes	SO	SO	SO	SO
	Misc Energy	SE	SE	SE	SE
	Misc Production	SG	SG	SG	SG
DEFERRED ITC					
41140	Deferred Investment Tax Credit - Fed ITC	DGU	DGU	DGU	DGU
41141	Deferred Investment Tax Credit - Idaho ITC	DGU	DGU	DGU	DGU
Interest Expense					
427	Interest on Long-Term Debt				
	Direct assigned - Jurisdiction	S	S	S	S
	Interest Expense	SNP	SNP	SNP	SNP
428	Amortization of Debt Disc & Exp Interest Expense	SNP	SNP	SNP	SNP
429	Amortization of Premium on Debt Interest Expense	SNP	SNP	SNP	SNP
431	Other Interest Expense Interest Expense	SNP	SNP	SNP	SNP
432	AFUDC - Borrowed AFUDC	SNP	SNP	SNP	SNP
Interest & Dividends					
419	Interest & Dividends Interest & Dividends	SNP	SNP	SNP	SNP
DEFERRED INCOME TAXES					
41010	Deferred Income Tax - Federal-DR				
	Direct assigned - Jurisdiction	S	S	S	S
	Electric Plant in Service	DITEXP	DITEXP	DITEXP	DITEXP
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Property Tax related	GPS	GPS	GPS	GPS
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	SNPD	SNPD	SNPD	SNPD
	Mining Plant	SE	SE	SE	SE
	Bad Debt	N/A	BADDEBT	BADDEBT	BADDEBT
	Tax Depreciation	N/A	TAXDEPR	TAXDEPR	TAXDEPR
	Cholla*	N/A	SSGCH	N/A	N/A

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
41011	Deferred Income Tax - State-DR				
	Direct assigned - Jurisdiction	S	S	S	S
	Electric Plant in Service	DITEXP	DITEXP	DITEXP	DITEXP
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Property Tax related	GPS	GPS	GPS	GPS
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	SNPD	SNPD	SNPD	SNPD
	Mining Plant	SE	SE	SE	SE
	Bad Debt	N/A	BADDEBT	BADDEBT	BADDEBT
	Tax Depreciation	N/A	TAXDEPR	TAXDEPR	TAXDEPR
41110	Deferred Income Tax - Federal-CR				
	Direct assigned - Jurisdiction	S	S	S	S
	Electric Plant in Service	DITEXP	DITEXP	DITEXP	DITEXP
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Property Tax related	GPS	GPS	GPS	GPS
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	SNPD	SNPD	SNPD	SNPD
	Mining Plant	SE	SE	SE	SE
	Contributions in aid of construction	N/A	CIAC	CIAC	CIAC
	Production, Other	N/A	SGCT	SGCT	SGCT
	Book Depreciation	N/A	SCHMDEXP	SCHMDEXP	SCHMDEXP
	Cholla*	N/A	SSGCH	N/A	N/A
41111	Deferred Income Tax - State-CR				
	Direct assigned - Jurisdiction	S	S	S	S
	Electric Plant in Service	DITEXP	DITEXP	DITEXP	DITEXP
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Property Tax related	GPS	GPS	GPS	GPS
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Distribution	SNPD	SNPD	SNPD	SNPD
	Mining Plant	SE	SE	SE	SE
	Contributions in aid of construction	N/A	CIAC	CIAC	CIAC
	Production, Other	N/A	SGCT	SGCT	SGCT
	Book Depreciation	N/A	SCHMDEXP	SCHMDEXP	SCHMDEXP
SCHEDULE - M ADDITIONS					
SCHMAF	Additions - Flow Through				
	Direct assigned - Jurisdiction	S	S	S	S

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
SCHMAP	Additions - Permanent				
	Direct assigned - Jurisdiction	N/A	S	S	S
	Mining related	SE	SE	SE	SE
	General	SO	SO	SO	SO
	Production / Transmission	N/A	SG	SG	SG
	Depreciation	N/A	SCHMDEXP	SCHMDEXP	SCHMDEXP
SCHMAT	Additions - Temporary				
	Direct assigned - Jurisdiction	S	S	S	S
	Contributions in aid of construction	CIAC	CIAC	CIAC	CIAC
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Pacific Hydro	SG	SG	SG	SG
	Mining Plant	SE	SE	SE	SE
	Production, Transmission	SG	SG	SG	SG
	Property Tax	GPS	GPS	GPS	GPS
	General	SO	SO	SO	SO
	Depreciation	SCHMDEXP	SCHMDEXP	SCHMDEXP	SCHMDEXP
		Distribution	N/A	SNPD	SNPD
	Production, Other	N/A	SGCT	SGCT	SGCT
SCHEDULE - M DEDUCTIONS					
SCHMDF	Deductions - Flow Through				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Pacific Hydro	SG	SG	SG	SG
SCHMDP	Deductions - Permanent				
	Direct assigned - Jurisdiction	S	S	S	S
	Mining Related	SE	SE	SE	SE
	Miscellaneous	SNP	SNP	SNP	SNP
	General	SO	SO	SO	SO
SCHMDT	Deductions - Temporary				
	Direct assigned - Jurisdiction	S	S	S	S
	Bad Debt	BADDEBT	BADDEBT	BADDEBT	BADDEBT
	Miscellaneous	SNP	SNP	SNP	SNP
	Pacific Hydro	SG	SG	SG	SG
	Mining related	SE	SE	SE	SE
	Production, Transmission	SG	SG	SG	SG
	Property Tax	GPS	GPS	GPS	GPS
	General	SO	SO	SO	SO
	Depreciation	TAXDEPR	TAXDEPR	TAXDEPR	TAXDEPR
		Distribution	SNPD	SNPD	SNPD
	Customer Related	N/A	CN	CN	CN
	Cholla*	N/A	SSGCH	N/A	N/A
State Income Taxes					
40911	State Income Taxes	IBT	CALCULATED**	CALCULATED**	CALCULATED**
40911	Renewable Energy Tax Credit	N/A	SG	SG	SG
40910	FIT True-up	S	S	S	S
40910	Renewable Energy Tax Credit	SG	SG	SG	SG

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		Allocation Factor			
Steam Production Plant					
310 - 316	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
Nuclear Production Plant					
320-325	Nuclear Plant	SG	SG	SG	SG
Hydraulic Plant					
330-336	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
Other Production Plant					
340-346	Other Production Plant	SG	SG	SG	SG
	Peaking Plants*	N/A	SSGCT	N/A	N/A
TRANSMISSION PLANT					
350-359	Transmission Plant	SG	SG	SG	SG
DISTRIBUTION PLANT					
360-373	Direct assigned - Jurisdiction	S	S	S	S
GENERAL PLANT					
389 - 398	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Production / Transmission	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Mining	N/A	SE	SE	SE
399	Coal Mine				
	Remaining Mining Plant	SE	SE	SE	SE
399L	WIDCO Capital Lease				
	WIDCO Capital Lease	SE	SE	SE	SE
1011390	General Capital Leases				
	Direct assigned - Jurisdiction	S	S	S	S
	General	SO	SO	SO	SO
	Production / Transmission	N/A	SG	SG	SG

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
INTANGIBLE PLANT					
301	Organization				
	Direct assigned - Jurisdiction	S	S	S	S
302	Franchise & Consent				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
303	Miscellaneous Intangible Plant				
	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Production / Transmission	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Mining	N/A	SE	SE	SE
303	Less Non-Utility Plant				
	Direct assigned - Jurisdiction	S	S	S	S
Rate Base Additions					
105	Plant Held For Future Use				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Mining Plant	SE	SE	SE	SE
114	Electric Plant Acquisition Adjustments				
	Direct assigned - Jurisdiction	S	S	S	S
	Production Plant	SG	SG	SG	SG
115	Accum Provision for Asset Acquisition Adjustments				
	Direct assigned - Jurisdiction	S	S	S	S
	Production Plant	SG	SG	SG	SG
120	Nuclear Fuel				
	Nuclear Fuel	SE	SE	SE	SE
124	Weatherization				
	Direct assigned - Jurisdiction	S	S	S	S
	General	SO	SO	SO	SO
182W	Weatherization				
	Direct assigned - Jurisdiction	S	S	S	S
186W	Weatherization				
	Direct assigned - Jurisdiction	S	S	S	S
151	Fuel Stock				
	Steam Production Plant	SE	SE	SE	SE
	Cholla*	N/A	SSECH	N/A	N/A

UM 1050

**Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition			
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In	
			<u>Allocation Factor</u>			
152	Fuel Stock - Undistributed Steam Production Plant	SE	SE	SE	SE	
25316	DG&T Working Capital Deposit Mining Plant	SE	SE	SE	SE	
25317	DG&T Working Capital Deposit Mining Plant	SE	SE	SE	SE	
25319	Provo Working Capital Deposit Mining Plant	SE	SE	SE	SE	
154	Materials and Supplies					
	Direct assigned - Jurisdiction	S	S	S	S	
	Production, Transmission	SG	SG	SG	SG	
	Mining	SE	SE	SE	SE	
	General	SO	SO	SD	SO	
	Production - Common	SNPPS	SNPPS	SG	SG	
	Hydro	SNPPH	SNPPH	SG	SG	
	Distribution	SNPD	SNPD	SNPD	SNPD	
	Production, Other	N/A	SNPPO	SG	SG	
163	Stores Expense Undistributed General	SO	SO	SO	SO	
25318	Provo Working Capital Deposit Provo Working Capital Deposit	SNPPS	SNPPS	SG	SG	
165	Prepayments					
	Direct assigned - Jurisdiction	S	S	S	S	
	Property Tax	GPS	GPS	GPS	GPS	
	Production, Transmission	SG	SG	SG	SG	
	Mining	SE	SE	SE	SE	
	General	SO	SO	SO	SO	
182M	Misc Regulatory Assets					
	Direct assigned - Jurisdiction	S	S	S	S	
	Production, Transmission	SG	SG	SG	SG	
	Mining	SE	SE	SE	SE	
	General	SO	SO	SO	SO	
	Cholla Transaction	SSGCH	SGCT	SGCT	SGCT	
186M	Misc Deferred Debits					
	Direct assigned - Jurisdiction	S	S	S	S	
	Production, Transmission	SG	SG	SG	SG	
	General	SO	SO	SO	SO	
	Mining	SE	SE	SE	SE	
	Production - Common	SNPPS	SNPPS	SG	SG	
Working Capital						
CWC	Cash Working Capital					
	Direct assigned - Jurisdiction	S	S	S	S	
OWC	Other Working Capital					

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		Allocation Factor			
131	Cash	SNP	SNP	SNP	SNP
135	Working Funds	SG	SG	SG	SG
141	Notes Receivable	N/A	SO	SO	SO
143	Other Accounts Receivable	SO	SO	SO	SO
232	Accounts Payable	SO	SO	SO	SO
232	Accounts Payable	SE	SE	SE	SE
232	Accounts Payable	N/A	SG	SG	SG
253	Deferred Hedge	SE	SE	SE	SE
25330	Other Deferred Credits - Misc	SE	SE	SE	SE
230	Other Deferred Credits - Misc	N/A	SE	SE	SE
254105	ARO Reg Liability	N/A	SE	SE	SE
Miscellaneous Rate Base					
18221	Unrec Plant & Reg Study Costs				
	Direct assigned - Jurisdiction	S	S	S	S
18222	Nuclear Plant - Trojan				
	Trojan Plant	TROJP	TROJP	TROJP	TROJP
	Trojan Plant	TROJD	TROJD	TROJD	TROJD
141	Notes Receivable				
	Employee Loans - Hunter Plant	SG	SG	SG	SG
Rate Base Deductions					
235	Customer Service Deposits				
	Direct assigned - Jurisdiction	S	S	S	S
2281	Prov for Property Insurance	SO	SO	SO	SO
2282	Prov for Injuries & Damages	SO	SO	SO	SO
2283	Prov for Pensions and Benefits	SO	SO	SO	SO
22841	Accum Misc Oper Prov				
	Mining	SE	SE	SE	SE
	Other Production	N/A	SG	SG	SG
22842	Accum Misc Oper Prov-Trojan				
	Trojan Plant	TROJD	TROJD	TROJD	TROJD
254105	FAS 143 ARO Regulatory Liability				
	Trojan Plant	N/A	TROJP	TROJP	TROJP
230	Asset Retirement Obligation				
	Trojan Plant	N/A	TROJP	TROJP	TROJP

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original		Current Definition	
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
252	Customer Advances for Construction				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
25398	SO2 Emissions	N/A	SE	SE	SE
25399	Other Deferred Credits				
	Direct assigned - Jurisdiction	S	S	S	S
	Production, Transmission	SG	SG	SG	SG
	General	N/A	SD	SO	SO
	Mining	SE	SE	SE	SE
254	Regulatory Liabilities				
	Regulatory Liabilities	N/A	S	S	S
	Regulatory Liabilities	N/A	SE	SE	SE
	Insurance Provision	N/A	SO	SO	SO
190	Accumulated Deferred Income Taxes				
	Direct assigned - Jurisdiction	S	S	S	S
	Bad Debt	BADDEBT	BADDEBT	BADDEBT	BADDEBT
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SD	SO	SO	SO
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TRDJD	TRDJD	TROJD
	Distribution	N/A	SNPD	SNPD	SNPD
	Mining Plant	N/A	SE	SE	SE
281	Accumulated Deferred Income Taxes				
	Production, Transmission	SG	SG	SG	SG
282	Accumulated Deferred Income Taxes				
	Direct assigned - Jurisdiction	S	S	S	S
	Depreciation	DITBAL	DITBAL	DITBAL	DITBAL
	Hydro Pacific	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJP	TROJP	TROJP
	Depreciation	N/A	TAXDEPR	TAXDEPR	TAXDEPR
	Depreciation	N/A	SCHMDEXP	SCHMDEXP	SCHMDEXP
	System Gross Plant	N/A	GPS	GPS	GPS
	Contribution in Aid of Construction	N/A	CIAC	CIAC	CIAC
	Cholla*	N/A	SSGCH	N/A	N/A
	Mining	N/A	SE	SE	SE

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
283	Accumulated Deferred Income Taxes		<u>Allocation Factor</u>		
	Direct assigned - Jurisdiction	S	S	S	S
	Depreciation	DITBAL	DITBAL	DITBAL	DITBAL
	Hydro Pacific	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	Customer Related	CN	CN	CN	CN
	General	SO	SO	SO	SO
	Miscellaneous	SNP	SNP	SNP	SNP
	Trojan	TROJP	TROJD	TROJD	TROJD
	Production, Other	N/A	SGCT	SGCT	SGCT
	Property Tax	N/A	GPS	GPS	GPS
	Mining Plant	N/A	SE	SE	SE
255	Accumulated Investment Tax Credit				
	Direct assigned - Jurisdiction	S	S	S	S
	Investment Tax Credits	ITC84	ITC84	ITC84	ITC84
	Investment Tax Credits	ITC85	ITC85	ITC85	ITC85
	Investment Tax Credits	ITC86	ITC86	ITC86	ITC86
	Investment Tax Credits	ITC88	ITC88	ITC88	ITC88
	Investment Tax Credits	ITC89	ITC89	ITC89	ITC89
	Investment Tax Credits	ITC90	ITC90	ITC90	ITC90
	Investment Tax Credits	DGU	DGU	DGU	DGU
PRODUCTION PLANT ACCUM DEPRECIATION					
108SP	Steam Prod Plant Accumulated Depr				
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
108NP	Nuclear Prod Plant Accumulated Depr				
	Nuclear Plant	SG	SG	SG	SG
108HP	Hydraulic Prod Plant Accum Depr				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
108OP	Other Production Plant - Accum Depr				
	Other Production Plant	SG	SG	SG	SG
	Peaking Plants*	N/A	SSGCT	N/A	N/A
TRANS PLANT ACCUM DEPR					
108TP	Transmission Plant Accumulated Depr				
	Transmission Plant	SG	SG	SG	SG
DISTRIBUTION PLANT ACCUM DEPR					
108360 - 108373	Distribution Plant Accumulated Depr				
	Direct assigned - Jurisdiction	S	S	S	S
108D00	Unclassified Dist Plant - Acct 300				
	Direct assigned - Jurisdiction	S	S	S	S
108DS	Unclassified Dist Sub Plant - Acct 300				
	Direct assigned - Jurisdiction	S	S	S	S
108DP	Unclassified Dist Sub Plant - Acct 300				

UM 1050

Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised	Revised	2010	Rolled
		Protocol	Protocol	Protocol	In
		Allocation Factor			
	Direct assigned - Jurisdiction	S	S	S	S
GENERAL PLANT ACCUM DEPR					
108GP	General Plant Accumulated Depr				
	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Production / Transmission	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Customer Related	CN	CN	CN	CN
	General SO	SO	SO	SO	SO
	Mining Plant	N/A	SE	SE	SE
108MP	Mining Plant Accumulated Depr.				
	Mining Plant	SE	SE	SE	SE
108MP	Less Centralia Situs Depreciation				
	Direct assigned - Jurisdiction	S	S	S	S
1081390	Accum Depr - Capital Lease				
	General	SO	SO	SO	SO
1081399	Accum Depr - Capital Lease				
	Direct assigned - Jurisdiction	S	S	S	S
ACCUM PROVISION FOR AMORTIZATION					
111SP	Accum Prov for Amort-Steam				
	Steam Plants	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
111GP	Accum Prov for Amort-General				
	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG
	Production / Transmission	SG	SG	SG	SG
	Peaking Plants*	SSGCT	SSGCT	N/A	N/A
	Cholla*	SSGCH	SSGCH	N/A	N/A
	Customer Related	CN	CN	CN	CN
	General SO	SO	SO	SO	SO
111HP	Accum Prov for Amort-Hydro				
	Pacific Hydro	SG	SG	SG	SG
	East Hydro	SG	SG	SG	SG

UM 1050

**Attachment 2 to the Stipulation
Allocation Factors Used in the Revised Protocol and 2010 Protocol**

Comparison of Allocation Factors in Appendix B to the Revised Protocol and 2010 Protocol

FERC ACCT	DESCRIPTION	Original	Current Definition		
		Revised Protocol	Revised Protocol	2010 Protocol	Rolled In
		<u>Allocation Factor</u>			
111IP	Accum Prov for Amort-Intangible Plant				
	Distribution	S	S	S	S
	Pacific Hydro	SG	SG	SG	SG
	Production, Transmission	SG	SG	SG	SG
	General	SO	SO	SO	SO
	Mining	SE	SE	SE	SE
	Customer Related	CN	CN	CN	CN
	Cholla*	SSGCH	SSGCH	N/A	N/A
111IP	Less Non-Utility Plant				
	Direct assigned - Jurisdiction	S	S	S	S
111399	Accum Prov for Amort-Mining				
	Mining Plant	SE	SE	SE	SE

Notes:

* Peaking plants and Cholla are no longer allocated on seasonal factors in the 2010 Protocol -- they are included in Steam Plants, Other Production Plant, and Production / Transmission categories.

** Rather than allocated to jurisdictions using the Income Before Tax factors, state income taxes are calculated by applying the blended statutory state and local tax rate to taxable income by jurisdiction.