

Docket No. UE-227  
Exhibit PPL/501  
Witness: Rick T. Link

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF THE STATE OF OREGON**

**PACIFICORP**

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**Exhibit Accompanying Rebuttal Testimony of Rick T. Link**

**ICNU's Responses to Data Requests**

**July 2011**

**BEFORE THE OREGON PUBLIC UTILITY COMMISSION**

**DOCKET NO. UE 227**

**ICNU'S RESPONSE TO PACIFICORP'S DATA REQUEST NO. 3.1**

**July 14, 2011**

**Data Request No. 3.1:**

See ICNU 100/Schoenbeck/3, lines 7-9. Please explain how using a third-party source of monthly and electricity forward price curves would eliminate any concerns regarding the possibility of gaming. Please explain the term "gaming" as used in this context. Please clarify whether Mr. Schoenbeck has found evidence of gaming as used in this context.

**Response to Data Request No. 3.1:**

Mr. Schoenbeck's testimony should be read or interpreted as referring to a reputable independent third party service provider such as ICE, Dow Jones or Platts. In that context, the concern over the possibility that the reported forward prices not reflecting the forward market at that time – gaming--would not exist. Any party having access to the data could readily verify that the reported prices were in fact the prices employed by the Company. For the fifteen days examined by Mr. Schoenbeck, he did not believe he observed any gaming for the Company's forward hubs where third party data was available.

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**ICNU'S RESPONSE TO PACIFICORP'S DATA REQUEST NO. 3.2**

**July 14, 2011**

**Data Request No. 3.2:**

See ICNU 100/Schoenbeck/3, lines 10-12. Please provide the analysis that shows a third-party source of monthly electricity and natural gas forward price curves that would allow for a more precise tracking of how forward market movements would impact the Company's NPC. Please explain the term "more precise" as used in this context.

**Response to Data Request No. 3.2:**

No specific analysis was done to support this statement. It is based on the fact that having the exact forward price series from an independent third party source would allow a party to precisely know the impact on the Company's net power cost. This is in contrast to the current circumstance whereby by a party would have to estimate the Company's internally generated forward prices in order to estimate the impact on the Company's net power cost from a market movement.