

Docket No. UM-1050
Exhibit PPL/101
Witness: Andrea L. Kelly

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

PACIFICORP

**Exhibit Accompanying Direct Testimony of Andrea L. Kelly
2010 Protocol, including Appendices A to F**

September 2010

1 **2010 Protocol**

2 **I. Introduction**

3 This 2010 PacifiCorp Inter-Jurisdictional Cost Allocation Protocol (2010
4 Protocol) is the result of continuing discussions that have occurred among
5 representatives of PacifiCorp, Commission staff members and other interested
6 parties from Utah, Oregon, Wyoming, and Idaho regarding issues arising from the
7 previously adopted Revised Protocol, and the Company's status as a multi-
8 jurisdictional utility.

9 PacifiCorp commits that it will continue to plan and operate its generation
10 and transmission system on a six-State integrated basis in a manner that achieves a
11 least cost/least risk Resource portfolio for its customers.

12 The 2010 Protocol describes regulatory policies, which, if utilized by all
13 States for rate proceedings filed prior to January 1, 2017, should afford PacifiCorp a
14 reasonable opportunity to recover all of its prudently incurred expenses and
15 investments and earn its authorized rate of return. The assignment of a particular
16 expense or investment, or allocation of a share of an expense or investment, to a
17 State pursuant to the 2010 Protocol is not intended to, and should not, prejudice the
18 prudence of those costs. Nothing in the 2010 Protocol shall abridge any State's right
19 and/or obligation to establish fair, just and reasonable rates based upon the law of
20 that State and the record established in rate proceedings conducted by that State.

21 Parties who have supported the ratification of the 2010 Protocol do so in the belief
22 that it will continue to achieve a solution to multistate issues that is in the public
23 interest. However, a party's support of the 2010 Protocol is not intended in any
24 manner to negate the necessary flexibility of the regulatory process to deal with

1 changed or unforeseen circumstances, and a party's support of the 2010 Protocol will
2 not bind or be used against that party in the event that unforeseen or changed
3 circumstances cause that party to conclude, in good faith, that the 2010 Protocol no
4 longer produces results that are just, reasonable and in the public interest. Support of
5 the 2010 Protocol shall not be deemed to constitute an acknowledgement by any
6 party of the validity or invalidity of any particular method, theory or principle of
7 regulation, cost recovery, cost of service or rate design and no party shall be deemed
8 to have agreed that any particular method, theory or principle of regulation, cost
9 recovery, cost of service or rate design employed in the 2010 Protocol is appropriate
10 for resolving any other issues.

11 The 2010 Protocol describes how the costs and wholesale revenues
12 associated with PacifiCorp's generation, transmission and distribution system will be
13 assigned or allocated among its six-State jurisdictions for purposes of establishing its
14 retail rates.

15 Definitions of terms that are capitalized in the 2010 Protocol are set forth in
16 Appendix A.

17 A table identifying the allocation factor to be applied to each component of
18 PacifiCorp's revenue requirement calculation is included as Appendix B.

19 The algebraic derivation of each allocation factor is contained in Appendix C.

20 A description and numeric example of how Special Contracts and related
21 discounts will be reflected in rates is set forth in Appendix D.

22 The fixed and levelized Embedded Cost Differential (ECD) amounts, that
23 will be included in filings made through December 31, 2016, are set forth in
24 Appendix E.

1 Each State's allocated share of each Mid-Columbia Contract and the method
2 for calculating the shares is set forth in Appendix F.

3 **II. Proposed Effective Date**

4 The 2010 Protocol will and apply to all PacifiCorp rate proceedings filed
5 prior to January 1, 2017.

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7 **III. Classification of Resource Costs**

8 All Resource Fixed Costs, Wholesale Contracts and Short-term Purchases
9 and Sales will be classified as 75 percent Demand-Related and 25 percent Energy-
10 Related. All costs associated with Non-Firm Purchases and Sales will be classified
11 as 100 percent Energy-Related.

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

14 Resources will be assigned to one of three categories for inter-jurisdictional
15 cost allocation purposes:

16 A. Regional Resources,

17 B. State Resources, or

18 C. System Resources.

19 There are two types of Regional Resource and four types of State Resources.

20 The remainder are System Resources which constitute the substantial majority of
21 PacifiCorp's Resources. Costs associated with each category and type of Resource
22 will be allocated on the following basis:

23 **A. Regional Resources**

24 Costs associated with Regional Resources will be assigned and
25 allocated as follows:

26 1. Hydro-Endowment.

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- a. Owned Hydro Embedded Cost Differential Adjustment. The Owned Hydro Embedded Cost Differential Adjustment is calculated as follows:
- The Forecasted Embedded Costs – Hydro-Electric Resources, less the Forecasted Embedded Costs – Pre-2005 Resources, multiplied by the normalized MWh’s of output from the Hydro-Electric Resources.
 - 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 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 Mid-Columbia Contracts Costs, less the Forecasted Embedded Costs – Pre-2005 Resources, multiplied by the normalized MWh’s of

- 1 output from the Mid-Columbia Contracts (Mid-C
2 less All Other).
- 3 • The calculation is made using forecasted
4 information contained in the Company's Baseline
5 Study (finalized in March 2010) for calendar years
6 2011 through 2016.
 - 7 • The forecasted allocation of Mid-Columbia
8 Contracts to each State is established pursuant to
9 Appendix F. The forecasted Mid-Columbia
10 differential is allocated on the MC factor and the
11 inverse amount is allocated on the SG factor to
12 compute State specific amounts for calendar years
13 2011 through 2016.
 - 14 • The net present value of the forecasted differential
15 by State is set at a fixed dollar level that will be
16 used for all PacifiCorp rate proceedings filed prior
17 to January 1, 2017.

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

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

- 1 a. Klamath Dam Removal Surcharge Adjustment. The
2 Klamath Dam Removal Surcharge is re-allocated to
3 Oregon (92 percent) and California (8 percent) as follows:
- 4 • Each State's initial allocated share of the Klamath
5 Dam Removal Surcharge is reversed and assigned to
6 Oregon and California on a situs basis. The
7 calculation is made using forecasted information
8 contained in the Company's Baseline Study (finalized
9 in March 2010) for calendar years 2011 through 2016.
 - 10 • The net present value of the forecasted adjustment by
11 State is set at a fixed dollar level that will be used for
12 all PacifiCorp rate proceedings filed prior to January 1,
13 2017. The levelized annual value for the calendar
14 years 2011 through 2016 time period will be used for
15 purposes of ratemaking for that time period.

16 **B. State Resources**

17 Costs associated with the four types of State Resources will be
18 assigned as follows:

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- 20 1. Demand-Side Management Programs: Costs associated with
21 Demand-Side Management Programs will be assigned on a
22 situs basis to the State in which the investment is made.
23 Benefits from these programs, in the form of reduced
24 consumption and contribution to peak, will be reflected
25 through time in the Load-Based Dynamic Allocation Factors.

- 1 2. Portfolio Standards: Costs associated with Resources acquired
2 pursuant to a State Portfolio Standard, which exceed the costs
3 PacifiCorp would have otherwise incurred, will be assigned on
4 a situs basis to the State adopting the standard.
- 5 3. New Qualifying Facilities (QF) Contracts: Costs associated
6 with any New QF Contract, which exceed the costs PacifiCorp
7 would have otherwise incurred acquiring Comparable
8 Resources, will be assigned on a situs basis to the State
9 approving such contract.
- 10 4. State-Specific Initiatives: Costs associated with Resources
11 acquired pursuant to a State-specific initiative will be assigned
12 on a situs basis to the State adopting the initiative. This
13 includes the costs of incentive programs, net-metering tariffs,
14 feed-in tariffs, capacity standard programs, electric vehicle
15 programs and the acquisition of renewable energy certificates.

16 **C. System Resources**

17 All Resources that are not Regional Resources or State Resources are
18 System Resources. Generally, all Fixed Costs associated with System
19 Resources and all costs incurred under Wholesale Contracts will be
20 allocated based upon the SG Factor. Generally, all Variable Costs
21 associated with System Resources will be allocated based upon the
22 SE Factor. Revenues received by the Company pursuant to Wholesale
23 Contracts will be allocated based upon the SG Factor. A complete

1 description of the allocation factors to be utilized is set forth in
2 Appendix B.

3 **D. Load Growth**

4 At the direction of the MSP Standing Committee, the Company and
5 parties will continue to analyze and quantify potential cost shifts
6 related to faster-growing States.¹ In addition, the MSP Standing
7 Committee will track key factors including actual relative growth
8 rates, forecast relative growth rates, costs of new Resources compared
9 to costs of existing Resources, and other factors deemed relevant to
10 any potential load growth-related issues.

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12 **V. Refunctionalization and Allocation of Transmission Costs and Revenues**

13 If the Company is required to refunctionalize assets that are currently
14 functionalized as “transmission” to “distribution”, the cost responsibility for any
15 such refunctionalized assets will be assigned to the State where they are located. Any
16 refunctionalization will be implemented under the guidance of the MSP Standing
17 Committee.

18 Costs associated with transmission assets, and firm wheeling expenses and
19 revenues, will be classified as 75 percent Demand-Related, 25 percent Energy-
20 Related and allocated among the States based upon the SG (System Generation)
21 factor. Non-firm wheeling expenses and revenues will be allocated among the States
22 based upon the SE Factor.

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¹ This issue will be monitored through studies that compute the costs allocated to each State for two cases: (a) with currently projected load growth together with a least-cost, least-risk mix of Resource additions to meet that growth and (b) with the fastest-growing State growing at the average growth projected for the remaining States, again with a least-cost, least-risk mix of Resource additions.

1 **VI. Assignment of Distribution Costs**

2 All distribution-related expenses and investment that can be directly assigned
3 will be directly assigned to the state where they are located. Those costs that cannot
4 be directly assigned will be allocated among States consistent with the factors set
5 forth in Appendix B.

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7 **VII. Allocation of Administrative and General Costs**

8 Administrative and general costs, costs of General Plant and costs of
9 Intangible Plant will be allocated among States consistent with the factors set forth in
10 Appendix B.

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12 **VIII. Allocation of Special Contracts**

13 Revenues associated with Special Contracts will be included in State
14 revenues and loads of Special Contract customers will be included in all Load-Based
15 Dynamic Allocation Factors. Special Contracts may or may not include Customer
16 Ancillary Service Contract attributes. In recognition that Special Contracts may take
17 different forms, Appendix D provides a written description and numeric example of
18 the regulatory treatment of Special Contracts and associated discounts.

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20 **IX. Allocation of Gain or Loss from Sale of Resources or Transmission**

21 **Assets**

22 Any loss or gain from the sale of a Resource (other than a Freed-Up
23 Resource) or a transmission asset will be allocated among States based upon the
24 allocation factor used to allocate the Fixed Costs of the Resource or the transmission
25 asset at the time of its sale. Each Commission will determine the appropriate
26 allocation of loss or gain allocated to that State as between State customers and
27 PacifiCorp shareholders.

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X. Implementation of Direct Access Programs

A. Allocation of Costs and Benefits of Freed-Up Resources

1. Loads lost to Direct Access – Where the Company is required to continue to plan for the load of Direct Access Customers, such load will be included in Load-Based Dynamic Allocation Factors for all Resources.
2. Loads of customers permanently choosing Direct Access or permanently opting out of New Resources – Where the Company is no longer required to plan for the load of customers who permanently choose direct access or permanently opt out of New Resources, such loads will be included in Load-Based Dynamic Allocation Factors for all Existing Resources but will not be included in Load-Based Dynamic Allocation Factors for New Resources acquired after the election to permanently choose Direct Access or opt out of New Resources. An effective date for this process will be established at such time as customers permanently choose Direct Access or opt out, and this process will be implemented under the guidance of the MSP Standing Committee.
3. In each State with Direct Access Customers, an additional step will take place for ratemaking purposes to establish a value or cost (which could include a transfer of Freed-Up Resources between customer classes within a State) resulting from the departure of the departing load; other States do not implement the second step.

B. Freed-Up Resource Sale Approval

1 Any proposed sale of a Freed-Up Resource for purposes of
2 calculating transition charges or credits will be subject to applicable
3 regulatory review and approval based upon a “no-harm” standard.
4 States implementing Direct Access Programs that involve the sale of
5 Freed-Up Resources will endeavor to propose a method for allocating
6 the gain or loss on a sale to Direct Access Customers in a manner that
7 satisfies the “no-harm” standard in respect to customers in the other
8 States. The parties agree that they will not advocate a sale of Freed-
9 Up Resources to be consummated if the proposed allocation of the
10 gain or loss from the sale would cause the Company to distribute
11 more than the total gain on a sale or recover less than the full amount
12 of the total loss on a sale.

13 **C. Allocation of Revenues and Costs from Direct Access Purchases**
14 **and Sales**

15 Revenues and costs from Direct Access Purchases and Sales will be
16 assigned situs to the State where the Direct Access Customers are
17 located and will not be included in Net Power Costs.

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19 **XI. Loss or Increase in Load**

20 Any loss or increase in retail load occurring as a result of condemnation or
21 municipalization, sale or acquisition of new service territory which involves less than
22 five percent of system load, realignment of service territories, changes in economic
23 conditions or gain or loss of large customers will be reflected in changes in Load-
24 Based Dynamic Allocation Factors. The allocation of costs and benefits arising from
25 merger, sale and acquisition transactions proposed by the Company involving more
26 than five percent of system load will be dealt with on a case-by-case basis in the
27 course of Commission approval proceedings.

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XII. Commission Regulation of Resources

PacifiCorp shall plan and acquire new Resources on a system-wide least cost, least risk basis. Prudently incurred investments in Resources will be reflected in rates consistent with the laws and regulations in each State.

XIII. Sustainability of 2010 Protocol

A. Issues of Interpretation

If questions of interpretation of the 2010 Protocol arise during rate proceedings and/or audits of results of PacifiCorp’s operations, parties will attempt to resolve them with reference to the intent of the parties who have supported the ratification of the 2010 Protocol.

B. MSP Standing Committee

1. The existing MSP Standing Committee will continue to be organized consisting of one member or delegate of each Commission. The chair of the MSP Standing Committee will be elected each year by the members of the Committee.
2. The MSP Standing Committee will appoint a Standing Neutral, at the Company’s expense, to facilitate discussions among States, monitor issues and assist the MSP Standing Committee.
3. At least once during each calendar year, the Standing Neutral will convene a meeting of the MSP Standing Committee and interested parties from all States for the purpose of discussing and monitoring emerging inter-jurisdictional issues facing the Company and its customers. The meetings will be open to all interested parties.

- 1 4. The MSP Standing Committee will consider possible
2 amendments to the 2010 Protocol that would be equitable to
3 PacifiCorp customers in all States and to the Company. The
4 MSP Standing Committee will have discretion to determine
5 how best to encourage consensual resolution of issues arising
6 under the 2010 Protocol. Its actions may include, but will not
7 be limited to: a) appointing a committee of interested parties
8 to study an issue and make recommendations, or b) retaining
9 (at the Company's expense) one or more disinterested parties
10 to make advisory findings on issues of fact arising under the
11 2010 Protocol.
- 12 5. The work of the MSP Standing Committee will be supported
13 by sound technical analysis. A party supporting ratification of
14 the 2010 Protocol will work in good faith to address issues
15 being considered by the MSP Standing Committee.

16 **C. 2010 Protocol Amendments**

17 Proposed amendments to the 2010 Protocol will be submitted by
18 PacifiCorp to each Commission for ratification. The 2010 Protocol
19 will only be deemed to have been amended if each of the
20 Commissions who have previously ratified the 2010 Protocol ratifies
21 the amendment. PacifiCorp will not seek Commission ratification of
22 any amendment to the 2010 Protocol unless and until it has provided
23 interested parties with at least six months advance notice of its intent
24 to do so and endeavored to obtain consensus regarding its proposed
25 amendment. A party's initial support or acceptance of the 2010
26 Protocol will not bind or be used against that party in the event that
27 unforeseen or changed circumstances cause that party to conclude that

1 the 2010 Protocol no longer produces just and reasonable results.
2 Prior to departing from the terms of the 2010 Protocol, consistent with
3 their legal obligations, Commissions and parties will endeavor to
4 cause their concerns to be presented at meetings of the MSP Standing
5 Committee and interested parties from all States in an attempt to
6 achieve consensus on a proposed resolution of those concerns.

7 **D. Interdependency among Commission Approvals**

8 The 2010 Protocol has been developed by the parties as an integrated,
9 inter-dependent, organic whole. Therefore, final ratification of the
10 2010 Protocol by any of the Commissions of Oregon, Utah, Wyoming
11 and Idaho, is expressly conditioned upon similar ratification of the
12 2010 Protocol by the other mentioned Commissions, without any
13 deletion or alteration of a material term, or the addition of other
14 material terms or conditions. Upon any rejection of the 2010
15 Protocol, or any material deletion, alteration, or addition to its terms,
16 by any one or more of the four Commissions, the Commissions who
17 have previously conditionally adopted the 2010 Protocol shall initiate
18 proceedings to determine whether they should reaffirm their prior
19 ratification of the 2010 Protocol, notwithstanding the action of the
20 other Commission or Commissions. The 2010 Protocol shall only be
21 in effect for a State upon final ratification by its Commission. The
22 Company will continue to bear the risk of inconsistent allocation
23 methods among the States.

APPENDIX A

2010 Protocol - Appendix A

Defined Terms

For purposes of this 2010 Protocol, the following terms will have the following meanings:

“2010 Protocol” means this 2010 PacifiCorp Inter-Jurisdictional Cost Allocation Protocol.

“Baseline Study” means the calculation of the Company’s projected revenue requirement for calendar years 2010 through 2019 and the corresponding inter-jurisdictional allocation. The Baseline Study was prepared in March 2010 and was designed to facilitate States’ assessment of the ongoing reasonableness of the Revised Protocol.

“Coincident Peak” means the hour each month that the combined demand of all PacifiCorp retail customers is greatest. In States using an historic test period, Coincident Peak is based upon actual, metered load data. In States using future test periods, Coincident Peak is based upon forecasted loads.

“Company” means PacifiCorp.

“Commission” means a utility regulatory commission in a State.

“Comparable Resource” means Resources with similar capacity factors, start-up costs, and other output and operating characteristics.

“Customer Ancillary Service Contracts” means contracts between the Company and a retail customer pursuant to which the Company pays the customer for the right to curtail service so as to lower the costs of operating the Company’s system.

“Demand-Related Costs” means capital and other Fixed Costs incurred by the Company in order to be prepared to meet the maximum demand imposed upon its system.

“Demand-Side Management Programs” means programs intended to reduce electricity use through activities or programs that promote electric energy efficiency or conservation, more efficient management of electric energy loads, or reductions in peak demand.

“Direct Access Customers” means retail electricity consumers located in PacifiCorp’s service territory that either: a) purchase electricity directly from a supplier other than PacifiCorp pursuant to a Direct Access Program or b) elect to have all or a portion of the electricity they purchase from PacifiCorp priced based upon market prices rather than the Company’s traditional cost-of-service rate. If a State implements a Direct Access Program pursuant to which Freed-Up Resources are transferred between customer classes, such transfers shall be considered Direct Access Purchases and Sales.

“Direct Access Program” means a law or regulation that permits retail consumers located in PacifiCorp’s service territory to purchase electricity directly from a supplier other than PacifiCorp.

“Direct Access Purchases and Sales” means Wholesale Contracts and Short-Term Purchases and Sales entered into by PacifiCorp either to supply customers who have become Direct Access Customers or to dispose of Freed-Up Resources.

“Energy-Related Costs” means costs, such as fuel costs that vary with the amount of energy delivered by the Company to its customers during any hour plus any portion of Fixed Costs that have been deemed to have been incurred by the Company in order to meet its energy requirements.

“Existing Resources” means Resources whose costs were committed to prior to Direct Access Customers making an election to permanently forego being served by the Company at a cost-of-service rate.

“FERC” means the Federal Energy Regulatory Commission.

“Fixed Costs” means costs incurred by the Company that do not vary with the amount of energy delivered by the Company to its customers during any hour.

“Forecasted Embedded Costs – Hydro-Electric Resources” means PacifiCorp’s total forecasted production costs contained in the Company’s Baseline Study, for calendar years 2011 through 2016, expressed in dollars per MWh, associated with Hydro-Electric Resources as recorded in the FERC Accounts listed in Appendix E to the Revised Protocol.

“Forecasted Embedded Costs – Pre-2005 Resources” means PacifiCorp’s total forecasted production costs of Pre-2005 Resources contained in the Company’s Baseline Study, for calendar years 2011 through 2016, expressed in dollars per MWh, other than costs associated with Hydro-Electric Resources, and Mid-Columbia Contracts, as recorded in the FERC Accounts listed in Appendix E to the Revised Protocol.

“Forecasted Mid-Columbia Contract Costs” means the total forecasted net costs incurred by PacifiCorp contained in the Company’s Baseline Study, for calendar years 2011 through 2016, expressed in dollars per MWh, under the Mid-Columbia Contracts.

“Freed-Up Resources” means Resources made available to the Company as a result of its customers becoming Direct Access Customers.

“General Plant” means capital investment included in FERC accounts 389 through 399.

“Grant County” means Public Utility District No. 2 of Grant County, Washington

“Hydro-Electric Resources” means Company-owned hydro-electric plants located in Oregon, Washington or California.

“Intangible Plant” means capital investment included in FERC accounts 301 through 303.

“Klamath Dam Removal Surcharge” means the tariffs collected from customers in California and Oregon for the purpose of providing funding to remove specific Klamath River dams, as detailed in the Klamath Hydroelectric Settlement Agreement.

“Klamath Hydroelectric Settlement Agreement” means the Klamath Hydroelectric Settlement Agreement executed on February 18, 2010 for the purpose of resolving specific FERC relicensing proceedings by establishing a process for potential facilities removal and operation of hydroelectric projects until that time.

“Load-Based Dynamic Allocation Factor” means an allocation factor that is calculated using States’ monthly energy usage and/or States’ contribution to monthly system Coincident Peak.

“Mid-Columbia Contracts” means the Power Sales Contract with Grant County dated May 22, 1956; the Power Sales Contract with Grant County dated June 22, 1959; the Priest Rapids Project Product Sales Contract with Grant County dated December 31, 2001; the Additional Products Sales Agreement with Grant County dated December 31, 2001; the Priest Rapids Project Reasonable Portion Power Sales Contract with Grant County dated December 31, 2001; the Power Sales Contract with Douglas County PUD dated September 18, 1963; the Power Sales Contract with Chelan County PUD dated November 14, 1957 and all successor contracts thereto.

“Net Power Costs” means PacifiCorp’s fuel and wheeling expenses and costs and revenues associated with Wholesale Contracts, Seasonal Contracts, Short-Term Purchases and Sales and Non-Firm Purchases and Sales.

“New QF Contracts” means Qualifying Facility Contracts that are entered into subsequent to September 15, 2010.

“New Resources” means Resources that are not Existing Resources as established pursuant to Paragraph XA2 of the Protocol.

“Non-Firm Purchases and Sales” means transactions at wholesale that are not Wholesale Contracts, Seasonal Contracts, Short-Term Purchases and Sales or Direct Access Purchases and Sales.

“Portfolio Standard” means a State law or regulation that requires PacifiCorp to acquire: (a) a particular type of Resource, (b) a particular quantity of Resources, (c) Resources in a prescribed manner or (d) Resources located in a particular geographic area.

“Pre-2005 Resources” means Resources (other than Mid-Columbia Contracts and Hydro-Electric Resources) that were part of the Company’s integrated system prior to January 1, 2005.

“Qualifying Facility Contracts” means contracts to purchase the output of small power production or cogeneration facilities developed under the Public Utility Regulatory Policies Act of 1978 (PURPA) and related State laws and regulations.

“Resources” means Company-owned and leased generating plants and mines, Wholesale Contracts, Seasonal Contracts, Short-Term Purchases and Sales and Non-firm Purchases and Sales.

“Short-Term Purchases and Sales” means physical or financial contracts pursuant to which PacifiCorp purchases, sells or exchanges firm power at wholesale and Customer Ancillary Service Contracts that are less than one year in duration.

“Special Contract” means a contract entered between PacifiCorp’s and one of its retail customers with prices, term and conditions different from otherwise-applicable tariff rates. Special Contracts may provide for a discount to reflect Customer Ancillary Services Contract attributes.

“Special Contract Ancillary Service Discounts” means discounts from otherwise applicable rates provided for in Special Contracts.

“Standing Neutral” means an independent party, with experience in electric utility ratemaking, retained by the MSP Standing Committee to facilitate discussions among States, monitor issues and assist the MSP Standing Committee as required.

“State Resources” means Resources whose costs are assigned to a single State to accommodate State-specific policy preferences.

“System Resources” means Resources that are not Regional Resources, State Resources or Direct Access Purchases and Sales and whose associated costs and revenues are allocated among all States on a dynamic basis.

“State” means Utah, Oregon, Wyoming, Idaho, Washington or California.

“Variable Costs” means costs incurred by the Company that vary with the amount of energy delivered by the Company to its customers during any hour.

“Wholesale Contracts” means physical or financial contracts pursuant to which PacifiCorp purchases, sells or exchanges firm power at wholesale and Customer Ancillary Service Contracts.

APPENDIX B

2010 Protocol - Appendix B

Allocation Factor Applied to each Component of Revenue Requirement

FERC <u>ACCT</u>	<u>DESCRIPTION</u>	ALLOCATION <u>FACTOR</u>
Sales to Ultimate Customers		
440	Residential Sales Direct assigned - Jurisdiction	S
442	Commercial & Industrial Sales Direct assigned - Jurisdiction	S
444	Public Street & Highway Lighting Direct assigned - Jurisdiction	S
445	Other Sales to Public Authority Direct assigned - Jurisdiction	S
448	Interdepartmental Direct assigned - Jurisdiction	S
447	Sales for Resale Direct assigned - Jurisdiction Non-Firm Firm	S SE SG
449	Provision for Rate Refund Direct assigned - Jurisdiction	S SG
Other Electric Operating Revenues		
450	Forfeited Discounts & Interest Direct assigned - Jurisdiction	S
451	Misc Electric Revenue Direct assigned - Jurisdiction Other - Common	S SO
454	Rent of Electric Property Direct assigned - Jurisdiction Common Other - Common	S SG SO
456	Other Electric Revenue Direct assigned - Jurisdiction Wheeling Non-firm, Other Common Wheeling - Firm, Other Customer Related	S SE SO SG CN
Miscellaneous Revenues		
41160	Gain on Sale of Utility Plant - CR Direct assigned - Jurisdiction Production, Transmission General Office	S SG SO

Allocation Factor Applied to each Component of Revenue Requirement

FERC <u>ACCT</u>	<u>DESCRIPTION</u>	ALLOCATION <u>FACTOR</u>
41170	Loss on Sale of Utility Plant	
	Direct assigned - Jurisdiction	S
	Production, Transmission	SG
	General Office	SO
4118	Gain from Emission Allowances	
	SO2 Emission Allowance sales	SE
41181	Gain from Disposition of NOX Credits	
	NOX Emission Allowance sales	SE
421	(Gain) / Loss on Sale of Utility Plant	
	Direct assigned - Jurisdiction	S
	Production, Transmission	SG
	General Office	SO
Miscellaneous Expenses		
4311	Interest on Customer Deposits	
	Utah Customer Service Deposits	CN
	Direct assigned - Jurisdiction	S
Steam Power Generation		
500, 502, 504-514	Operation Supervision & Engineering	
	Steam Plants	SG
501	Fuel Related	
	Steam Plants	SE
503	Steam From Other Sources	
	Steam Royalties	SE
Nuclear Power Generation		
517 - 532	Nuclear Power O&M	
	Nuclear Plants	SG
Hydraulic Power Generation		
535 - 545	Hydro O&M	
	Pacific Hydro	SG
	East Hydro	SG
Other Power Generation		
546, 548-554	Operation Super & Engineering	
	Other Production Plant	SG
547	Fuel	
	Other Fuel Expense	SE
Other Power Supply		
555	Purchased Power	
	Direct assigned - Jurisdiction	S
	Firm	SG
	Non-firm	SE
	100 MW Hydro Extension	SG

Allocation Factor Applied to each Component of Revenue Requirement

FERC <u>ACCT</u>	<u>DESCRIPTION</u>	ALLOCATION <u>FACTOR</u>
556	System Control & Load Dispatch	
	Other Expenses	SG
557	Other Expenses	
	Direct assigned - Jurisdiction	S
	Other Expenses	SG
	2010 Protocol Adjustments	
	Hydro Endowment	S
	Klamath Dam Removal Surcharge	S
Klamath Dam Removal Surcharge Re-allocation	S	
TRANSMISSION EXPENSE		
560-564, 566-573	Transmission O&M	
	Transmission Plant	SG
565	Transmission of Electricity by Others	
	Firm Wheeling	SG
	Non-Firm Wheeling	SE
DISTRIBUTION EXPENSE		
580 - 598	Distribution O&M	
	Direct assigned - Jurisdiction	S
Other Distribution	SNPD	
CUSTOMER ACCOUNTS EXPENSE		
901 - 905	Customer Accounts O&M	
	Direct assigned - Jurisdiction	S
	Total System Customer Related	CN
CUSTOMER SERVICE EXPENSE		
907 - 910	Customer Service O&M	
	Direct assigned - Jurisdiction	S
	Total System Customer Related	CN
SALES EXPENSE		
911 - 916	Sales Expense O&M	
	Direct assigned - Jurisdiction	S
	Total System Customer Related	CN
ADMINISTRATIVE & GEN EXPENSE		
920-935	Administrative & General Expense	
	Direct assigned - Jurisdiction	S
	Customer Related	CN
	General	SO
	FERC Regulatory Expense	SG
DEPRECIATION EXPENSE		
403SP	Steam Depreciation	
	Steam Plants	SG
403NP	Nuclear Depreciation	
	Nuclear Plant	SG

Allocation Factor Applied to each Component of Revenue Requirement

FERC ACCT	DESCRIPTION	ALLOCATION FACTOR
403HP	Hydro Depreciation	
	Pacific Hydro	SG
	East Hydro	SG
403OP	Other Production Depreciation	
	Other Production Plant	SG
403TP	Transmission Depreciation	
	Transmission Plant	SG
403	Distribution Depreciation Direct assigned - Jurisdiction	
	Land & Land Rights	S
	Structures	S
	Station Equipment	S
	Storage Battery Equipment	S
	Poles & Towers	S
	OH Conductors	S
	UG Conduit	S
	UG Conductor	S
	Line Trans	S
	Services	S
	Meters	S
	Inst Cust Prem	S
	Leased Property	S
Street Lighting	S	
403GP	General Depreciation	
	Distribution	S
	Steam Plants	SG
	Mining	SE
	Pacific Hydro	SG
	East Hydro	SG
	Transmission	SG
	Customer Related	CN
General SO	SO	
403MP	Mining Depreciation	
	Remaining Mining Plant	SE
AMORTIZATION EXPENSE		
404GP	Amort of LT Plant - Capital Lease Gen	
	Direct assigned - Jurisdiction	S
	General	SO
	Customer Related	CN
404SP	Amort of LT Plant - Cap Lease Steam	
	Steam Production Plant	SG
404IP	Amort of LT Plant - Intangible Plant	
	Distribution	S
	Production, Transmission	SG
	General	SO
	Mining Plant	SE
	Customer Related	CN

Allocation Factor Applied to each Component of Revenue Requirement

FERC <u>ACCT</u>	<u>DESCRIPTION</u>	ALLOCATION <u>FACTOR</u>
404MP	Amort of LT Plant - Mining Plant Mining Plant	SE
404HP	Amortization of Other Electric Plant Pacific Hydro East Hydro	SG SG
405	Amortization of Other Electric Plant Direct assigned - Jurisdiction	S
406	Amortization of Plant Acquisition Adj Direct assigned - Jurisdiction Production Plant	S SG
407	Amort of Prop Losses, Unrec Plant, etc Direct assigned - Jurisdiction Production, Transmission Trojan	S SG TROJP
Taxes Other Than Income		
408	Taxes Other Than Income Direct assigned - Jurisdiction Property System Taxes Misc Energy Misc Production	S GPS SO SE SG
DEFERRED ITC		
41140	Deferred Investment Tax Credit - Fed ITC	DGU
41141	Deferred Investment Tax Credit - Idaho ITC	DGU
Interest Expense		
427	Interest on Long-Term Debt Direct assigned - Jurisdiction Interest Expense	S SNP
428	Amortization of Debt Disc & Exp Interest Expense	SNP
429	Amortization of Premium on Debt Interest Expense	SNP
431	Other Interest Expense Interest Expense	SNP
432	AFUDC - Borrowed AFUDC	SNP

Allocation Factor Applied to each Component of Revenue Requirement

FERC ACCT	DESCRIPTION	ALLOCATION FACTOR
Interest & Dividends		
419	Interest & Dividends	
	Interest & Dividends	SNP
DEFERRED INCOME TAXES		
41010	Deferred Income Tax - Federal-DR	
	Direct assigned - Jurisdiction	S
	Electric Plant in Service	DITEXP
	Pacific Hydro	SG
	Production, Transmission	SG
	Customer Related	CN
	General	SO
	Property Tax related	GPS
	Miscellaneous	SNP
	Trojan	TROJD
	Distribution	SNPD
	Mining Plant	SE
	Bad Debt	BADDEBT
	Tax Depreciation	TAXDEPR
41011	Deferred Income Tax - State-DR	
	Direct assigned - Jurisdiction	S
	Electric Plant in Service	DITEXP
	Pacific Hydro	SG
	Production, Transmission	SG
	Customer Related	CN
	General	SO
	Property Tax related	GPS
	Miscellaneous	SNP
	Trojan	TROJD
	Distribution	SNPD
	Mining Plant	SE
	Bad Debt	BADDEBT
	Tax Depreciation	TAXDEPR
41110	Deferred Income Tax - Federal-CR	
	Direct assigned - Jurisdiction	S
	Electric Plant in Service	DITEXP
	Pacific Hydro	SG
	Production, Transmission	SG
	Customer Related	CN
	General	SO
	Property Tax related	GPS
	Miscellaneous	SNP
	Trojan	TROJD
	Distribution	SNPD
	Mining Plant	SE
	Contributions in aid of construction	CIAC
	Production, Other	SGCT
	Book Depreciation	SCHMDEXP

Allocation Factor Applied to each Component of Revenue Requirement

FERC ACCT	DESCRIPTION	ALLOCATION FACTOR
41111	Deferred Income Tax - State-CR	
	Direct assigned - Jurisdiction	S
	Electric Plant in Service	DITEXP
	Pacific Hydro	SG
	Production, Transmission	SG
	Customer Related	CN
	General	SO
	Property Tax related	GPS
	Miscellaneous	SNP
	Trojan	TROJD
	Distribution	SNPD
	Mining Plant	SE
	Contributions in aid of construction	CIAC
	Production, Other	SGCT
Book Depreciation	SCHMDEXP	
SCHEDULE - M ADDITIONS		
SCHMAF	Additions - Flow Through	
	Direct assigned - Jurisdiction	S
SCHMAP	Additions - Permanent	
	Direct assigned - Jurisdiction	S
	Mining related	SE
	General	SO
	Production / Transmission	SG
SCHMAT	Additions - Temporary	
	Direct assigned - Jurisdiction	S
	Contributions in aid of construction	CIAC
	Miscellaneous	SNP
	Trojan	TROJD
	Pacific Hydro	SG
	Mining Plant	SE
	Production, Transmission	SG
	Property Tax	GPS
	General	SO
	Depreciation	SCHMDEXP
	Distribution	SNPD
	Production, Other	SGCT
SCHEDULE - M DEDUCTIONS		
SCHMDF	Deductions - Flow Through	
	Direct assigned - Jurisdiction	S
	Production, Transmission	SG
	Pacific Hydro	SG
SCHMDP	Deductions - Permanent	
	Direct assigned - Jurisdiction	S
	Mining Related	SE
	Miscellaneous	SNP
	General	SO

Allocation Factor Applied to each Component of Revenue Requirement

FERC ACCT	DESCRIPTION	ALLOCATION FACTOR
SCHMDT	Deductions - Temporary	
	Direct assigned - Jurisdiction	S
	Bad Debt	BADDEBT
	Miscellaneous	SNP
	Pacific Hydro	SG
	Mining related	SE
	Production, Transmission	SG
	Property Tax	GPS
	General	SO
	Depreciation	TAXDEPR
	Distribution	SNPD
	Customer Related	CN
State Income Taxes		
40911	State Income Taxes	
	Income Before Taxes	IBT
40910	FIT True-up	S
40910	Wyoming Wind Tax Credit	SG
Steam Production Plant		
310 - 316		
	Steam Plants	SG
Nuclear Production Plant		
320-325		
	Nuclear Plant	SG
Hydraulic Plant		
330-336		
	Pacific Hydro	SG
	East Hydro	SG
Other Production Plant		
340-346		
	Other Production Plant	SG
TRANSMISSION PLANT		
350-359		
	Transmission Plant	SG
DISTRIBUTION PLANT		
360-373		
	Direct assigned - Jurisdiction	S

Allocation Factor Applied to each Component of Revenue Requirement

FERC ACCT	DESCRIPTION	ALLOCATION FACTOR
GENERAL PLANT		
389 - 398	Distribution	S
	Pacific Hydro	SG
	East Hydro	SG
	Production / Transmission	SG
	Customer Related	CN
	General	SO
	Mining	SE
399	Coal Mine	
	Remaining Mining Plant	SE
399L	WIDCO Capital Lease	
	WIDCO Capital Lease	SE
1011390	General Capital Leases	
	Direct assigned - Jurisdiction	S
	General	SO
	Generation / Transmission	SG
INTANGIBLE PLANT		
301	Organization	
	Direct assigned - Jurisdiction	S
302	Franchise & Consent	
	Direct assigned - Jurisdiction	S
	Production, Transmission	SG
303	Miscellaneous Intangible Plant	
	Distribution	S
	Pacific Hydro	SG
	East Hydro	SG
	Production / Transmission	SG
	Customer Related	CN
	General	SO
	Mining	SE
303	Less Non-Utility Plant	
	Direct assigned - Jurisdiction	S
Rate Base Additions		
105	Plant Held For Future Use	
	Direct assigned - Jurisdiction	S
	Production, Transmission	SG
	Mining Plant	SE
114	Electric Plant Acquisition Adjustments	
	Direct assigned - Jurisdiction	S
	Production Plant	SG
115	Accum Provision for Asset Acquisition Adjustments	
	Direct assigned - Jurisdiction	S
	Production Plant	SG

Allocation Factor Applied to each Component of Revenue Requirement

FERC <u>ACCT</u>	<u>DESCRIPTION</u>	<u>ALLOCATION FACTOR</u>
120	Nuclear Fuel Nuclear Fuel	SE
124	Weatherization Direct assigned - Jurisdiction General	S SO
182W	Weatherization Direct assigned - Jurisdiction	S
186W	Weatherization Direct assigned - Jurisdiction	S
151	Fuel Stock Steam Production Plant	SE
152	Fuel Stock - Undistributed Steam Production Plant	SE
25316	DG&T Working Capital Deposit Mining Plant	SE
25317	DG&T Working Capital Deposit Mining Plant	SE
25319	Provo Working Capital Deposit Mining Plant	SE
154	Materials and Supplies Direct assigned - Jurisdiction Production, Transmission Mining General Production - Common Hydro Distribution Production, Other	S SG SE SO SNPPS SNPPH SNPD SNPPO
163	Stores Expense Undistributed General	SO
25318	Provo Working Capital Deposit Provo Working Capital Deposit	SNPPS
165	Prepayments Direct assigned - Jurisdiction Property Tax Production, Transmission Mining General	S GPS SG SE SO

Allocation Factor Applied to each Component of Revenue Requirement

FERC <u>ACCT</u>	<u>DESCRIPTION</u>	ALLOCATION <u>FACTOR</u>
182M	Misc Regulatory Assets	
	Direct assigned - Jurisdiction	S
	Production, Transmission	SG
	Mining	SE
	General	SO
	Production, Other	SGCT
186M	Misc Deferred Debits	
	Direct assigned - Jurisdiction	S
	Production, Transmission	SG
	General	SO
	Mining	SE
	Production - Common	SNPPS
Working Capital		
CWC	Cash Working Capital	
	Direct assigned - Jurisdiction	S
OWC	Other Working Capital	
131	Cash	SNP
135	Working Funds	SG
143	Other Accounts Receivable	SO
232	Accounts Payable	SO
232	Accounts Payable	SE
253	Deferred Hedge	SE
25330	Other Deferred Credits - Misc	SE
230	Other Deferred Credits - Misc	SE
Miscellaneous Rate Base		
18221	Unrec Plant & Reg Study Costs	
	Direct assigned - Jurisdiction	S
18222	Nuclear Plant - Trojan	
	Trojan Plant	TROJP
	Trojan Plant	TROJD
141	Notes Receivable	
	Employee Loans - Hunter Plant	SG
Rate Base Deductions		
235	Customer Service Deposits	
	Direct assigned - Jurisdiction	S
2281	Prov for Property Insurance	SO
2282	Prov for Injuries & Damages	SO

Allocation Factor Applied to each Component of Revenue Requirement

FERC <u>ACCT</u>	<u>DESCRIPTION</u>	ALLOCATION <u>FACTOR</u>
2283	Prov for Pensions and Benefits	SO
22841	Accum Misc Oper Prov-Black Lung Mining	SE
22842	Accum Misc Oper Prov-Trojan Trojan Plant	TROJD
254105	FAS 143 ARO Regulatory Liability Trojan Plant	TROJP
230	Asset Retirement Obligation Trojan Plant	TROJP
252	Customer Advances for Construction Direct assigned - Jurisdiction Production, Transmission Customer Related	S SG CN
25399	Other Deferred Credits Direct assigned - Jurisdiction Production, Transmission Mining	S SG SE
254	Regulatory Liabilities Regulatory Liabilities Insurance Provision	SE SO
190	Accumulated Deferred Income Taxes Direct assigned - Jurisdiction Bad Debt Pacific Hydro Production, Transmission Customer Related General Miscellaneous Trojan Distribution Mining Plant	S BADDEBT SG SG CN SO SNP TROJD SNPD SE
281	Accumulated Deferred Income Taxes Production, Transmission	SG
282	Accumulated Deferred Income Taxes Direct assigned - Jurisdiction Depreciation Hydro Pacific Production, Transmission Customer Related General Miscellaneous Trojan	S DITBAL SG SG CN SO SNP TROJP

Allocation Factor Applied to each Component of Revenue Requirement

FERC ACCT	DESCRIPTION	ALLOCATION FACTOR
283	Accumulated Deferred Income Taxes	
	Direct assigned - Jurisdiction	S
	Depreciation	DITBAL
	Hydro Pacific	SG
	Production, Transmission	SG
	Customer Related	CN
	General	SO
	Miscellaneous	SNP
	Trojan	TROJD
	Production, Other	SGCT
	Property Tax	GPS
Mining Plant	SE	
255	Accumulated Investment Tax Credit	
	Direct assigned - Jurisdiction	S
	Investment Tax Credits	ITC84
	Investment Tax Credits	ITC85
	Investment Tax Credits	ITC86
	Investment Tax Credits	ITC88
	Investment Tax Credits	ITC89
	Investment Tax Credits	ITC90
Investment Tax Credits	DGU	
PRODUCTION PLANT ACCUM DEPRECIATION		
108SP	Steam Prod Plant Accumulated Depr	
	Steam Plants	SG
108NP	Nuclear Prod Plant Accumulated Depr	
	Nuclear Plant	SG
108HP	Hydraulic Prod Plant Accum Depr	
	Pacific Hydro	SG
	East Hydro	SG
108OP	Other Production Plant - Accum Depr	
	Other Production Plant	SG
TRANS PLANT ACCUM DEPR		
108TP	Transmission Plant Accumulated Depr	
	Transmission Plant	SG
DISTRIBUTION PLANT ACCUM DEPR		
108360 - 108373	Distribution Plant Accumulated Depr	
	Direct assigned - Jurisdiction	S
108D00	Unclassified Dist Plant - Acct 300	
	Direct assigned - Jurisdiction	S
108DS	Unclassified Dist Sub Plant - Acct 300	
	Direct assigned - Jurisdiction	S
108DP	Unclassified Dist Sub Plant - Acct 300	
	Direct assigned - Jurisdiction	S

Allocation Factor Applied to each Component of Revenue Requirement

FERC <u>ACCT</u>	<u>DESCRIPTION</u>	<u>ALLOCATION FACTOR</u>
GENERAL PLANT ACCUM DEPR		
108GP	General Plant Accumulated Depr	
	Distribution	S
	Pacific Hydro	SG
	East Hydro	SG
	Production / Transmission	SG
	Customer Related	CN
	General SO	SO
	Mining Plant	SE
	Customer Related	CN
108MP	Mining Plant Accumulated Depr.	
	Mining Plant	SE
108MP	Less Centralia Situs Depreciation	
	Direct assigned - Jurisdiction	S
1081390	Accum Depr - Capital Lease	
	General	SO
1081399	Accum Depr - Capital Lease	
	Direct assigned - Jurisdiction	S
ACCUM PROVISION FOR AMORTIZATION		
111SP	Accum Prov for Amort-Steam	
	Steam Plants	SG
111GP	Accum Prov for Amort-General	
	Distribution	S
	Pacific Hydro	SG
	East Hydro	SG
	Production / Transmission	SG
	Customer Related	CN
	General SO	SO
111HP	Accum Prov for Amort-Hydro	
	Pacific Hydro	SG
	East Hydro	SG
111IP	Accum Prov for Amort-Intangible Plant	
	Distribution	S
	Pacific Hydro	SG
	Production, Transmission	SG
	General	SO
	Mining	SE
	Customer Related	CN
111IP	Less Non-Utility Plant	
	Direct assigned - Jurisdiction	S
111399	Accum Prov for Amort-Mining	
	Mining Plant	SE

APPENDIX C

2010 Protocol - Appendix C
Allocation Factors
Algebraic Derivations

September 15, 2010

Allocation Factors

PacifiCorp serves eight jurisdictions. Jurisdictions are represented by the index i = California, Idaho, Oregon, Utah, Washington, Eastern Wyoming, Western Wyoming, & FERC.

The following assumptions are made in the factor derivations:

It is assumed that the 12CP (j=1 to 12) method is used in defining the System Capacity (“SC”).

It is assumed that twelve months (j=1 to 12) method is used in defining the System Energy (“SE”).

In defining the System Generation (“SG”) factor, the weighting of 75 percent System Capacity, 25 percent System Energy is assumed to continue.

While it is agreed that the peak loads & input energy should be temperature adjusted, no decision has been made upon the methodology to do these adjustments.

System Capacity Factor (“SC”)

$$SC_i = \frac{\sum_{j=1}^{12} TAP_{ij}}{8 \sum_{i=1}^{12} \sum_{j=1}^{12} TAP_{ij}}$$

where:

- SC_i = System Capacity Factor for jurisdiction i.
- TAP_{ij} = Temperature Adjusted Peak Load of jurisdiction i in month j at the time of the System Peak.

System Energy Factor (“SE”)

$$SE_i = \frac{\sum_{j=1}^{12} TAE_{ij}}{8 \cdot \sum_{i=1}^{12} \sum_{j=1}^{12} TAE_{ij}}$$

where: SE_i = **System Energy Factor** for jurisdiction i.
 TAE_{ij} = Temperature Adjusted Input Energy of jurisdiction i in month j.

System Generation Factor (“SG”)

$$SG_i = .75 * SC_i + .25 * SE_i$$

where: SG_i = **System Generation Factor** for jurisdiction i.
 SC_i = System Capacity for jurisdiction i.
 SE_i = System Energy for jurisdiction i.

Mid-C Factor (“MC”)

$$MC_i = \frac{WMCE_i}{\sum_{i=1}^{i=8} WMCE_i}$$

where: MC_i = **Mid-C Factor** for jurisdiction i.

$$WMCE_i = E_{ipr}^* + (E_{rr} * SG_i) + (E_{wa} * WWA_i) + (E_w * SG_i) \quad \text{Weighted Mid-C Contracts annual energy generation}$$

where:

$$E_{ipr}^* = E_{ipr} \quad \text{If } i \text{ is Oregon, otherwise}$$

$$E_{ipr}^* = 0$$

$$E_{ipr} = \text{Annual Energy generation of Priest Rapids.}$$

$$E_{rr} = \text{Annual Energy generation of Rocky Reach.}$$

$$E_{wa} = \text{Annual Energy generation of Wanapum.}$$

$$E_w = \text{Annual Energy generation of Wells.}$$

$$WWA_i = \frac{SG_i^*}{\sum_{i=8}^{i=1} SG_i^*} \quad \text{Weighted Wanapum Energy}$$

where:

$$SG_i^* = SG_i \text{ if } i \text{ is Washington or Oregon jurisdiction, otherwise}$$

$$SG_i^* = 0.$$

$$SG_i = \text{System Generation for jurisdiction } i.$$

Division Generation - Pacific Factor (“DGP”)

$$DGP_i = \frac{SG_i^*}{\sum_{i=8}^{i=1} SG_i^*}$$

where:

$$DGP_i = \text{Division Generation - Pacific Factor for jurisdiction } i.$$

$SG_i^* = SG_i$ if i is a Pacific jurisdiction, otherwise
 $SG_i^* = 0$.
 $SG_i =$ System Generation for jurisdiction i.

Division Generation - Utah Factor (“DGU”)

$$DGUI = \frac{SG_i^*}{\sum_{i=1}^{i=8} SG_i^*}$$

where:

$DGUI =$ **Division Generation - Utah Factor** for jurisdiction i.
 $SG_i^* = SG_i$ if i is a Utah jurisdiction, otherwise
 $SG_i^* = 0$.
 $SG_i =$ System Generation for jurisdiction i.

System Net Plant Production - Steam Factor (“SNPPS”)

$$SNPPS_i = \frac{SG_i^* (PPS - ADPPS)}{(PPS - ADPPS)}$$

where:

$SNPPS_i =$ **System Net Plant - Steam Factor** for jurisdiction i.
 $SG_i =$ System Generation for jurisdiction i.
 $PPS =$ Steam Production Plant.
 $ADPPS =$ Accumulated Depreciation Steam Production Plant.

System Net Plant Production - Hydro Factor (“SNPPH”)

$$SNPPH_i = \frac{SG_i^*(PPHE - ADPPHE) + SG_i^*(PPHRP - ADPPHRP)}{(PPH - ADPPH)}$$

where:

$SNPPH_i$	=	System Net Plant - Hydro Factor for jurisdiction i.
SG_i	=	System Generation for jurisdiction i.
$PPHE$	=	Hydro Production Plant – East.
$ADPPHE$	=	Accumulated Depreciation & Amortization Hydro Production Plant - East.
$PPHRP$	=	Hydro Production Plant - Pacific.
$ADPPHRP$	=	Accumulated Depreciation & Amortization Hydro Production Plant - Pacific.
PPH	=	Hydro Production Plant.
$ADPPH$	=	Accumulated Depreciation & Amortization Hydro Production Plant.

System Net Plant - Distribution Factor (“SNPD”)

$$SNPD_i = \frac{PD_i - ADPD_i}{(PD - ADPD)}$$

where:

$SNPD_i$	=	System Net Plant - Distribution Factor for jurisdiction i.
PD_i	=	Distribution Plant - for jurisdiction i.
$ADPD_i$	=	Accumulated Depreciation Distribution Plant - for jurisdiction i.
PD	=	Distribution Plant.
$ADPD$	=	Accumulated Depreciation Distribution Plant.

System Gross Plant - System Factor (“GPS”)

$$GPS_i = \frac{PP_i + PT_i + PD_i + PG_i + PI_i}{\sum_{i=1}^{i=8} (PP_i + PT_i + PD_i + PG_i + PI_i)}$$

- $GP-S_i$ = **Gross Plant - System Factor** for jurisdiction i.
- PP_i = Production Plant for jurisdiction i.
- PT_i = Transmission Plant for jurisdiction i.
- PD_i = Distribution Plant for jurisdiction i.
- PG_i = General Plant for jurisdiction i.
- PI_i = Intangible Plant for jurisdiction i.

System Net Plant Factor (“SNP”)

$$SNP_i = \frac{PP_i + PT_i + PD_i + PG_i + PI_i - ADPP_i - ADPT_i - ADPD_i - ADPG_i - ADPI_i}{\sum_{i=1}^{i=8} (PP_i + PT_i + PD_i + PG_i + PI_i - ADPP_i - ADPT_i - ADPD_i - ADPG_i - ADPI_i)}$$

- SNP_i = **System Net Plant Factor** for jurisdiction i.
- PP_i = Production Plant for jurisdiction i.
- PT_i = Transmission Plant for jurisdiction i.
- PD_i = Distribution Plant for jurisdiction i.
- PG_i = General Plant for jurisdiction i.
- PI_i = Intangible Plant for jurisdiction i.
- $ADPP_i$ = Accumulated Depreciation Production Plant for jurisdiction i.
- $ADPT_i$ = Accumulated Depreciation Transmission Plant for jurisdiction i.
- $ADPD_i$ = Accumulated Depreciation Distribution Plant for jurisdiction i.
- $ADPG_i$ = Accumulated Depreciation General Plant for jurisdiction i.
- $ADPI_i$ = Accumulated Depreciation Intangible Plant for jurisdiction i.

System Overhead - Gross Factor (“SO”)

$$SOG_i = \frac{PP_i + PT_i + PD_i + PG_i + PI_i - PP_{oi} - PT_{oi} - PD_{oi} - PG_{oi} - PI_{oi}}{\sum_{i=1}^{i=8} (PP_i + PT_i + PD_i + PG_i + PP_i - PP_{oi} - PT_{oi} - PD_{oi} - PG_{oi} - PI_{oi})}$$

SOG_i = **System Overhead - Gross Factor** for jurisdiction i.

PP_i = Gross Production Plant for jurisdiction i.

PT_i = Gross Transmission Plant for jurisdiction i.

PD_i = Gross Distribution Plant for jurisdiction i.

PG_i = Gross General Plant for jurisdiction i.

PI_i = Gross Intangible Plant for jurisdiction i.

PP_{oi} = Gross Production Plant for jurisdiction i allocated on a SO factor.

PT_{oi} = Gross Transmission Plant for jurisdiction i allocated on a SO factor

PD_{oi} = Gross Distribution Plant for jurisdiction i allocated on a SO factor

PG_{oi} = Gross General Plant for jurisdiction i allocated on a SO factor

PI_{oi} = Gross Intangible Plant for jurisdiction i allocated on a SO factor

Income Before Taxes Factor (“IBT”)

$$IBT_i = \frac{TIBT_i}{\sum_{i=1}^{i=8} TIBT_i}$$

IBT_i = **Income before Taxes Factor** for jurisdiction i.

$TIBT_i$ = Total Income before Taxes for jurisdiction i.

Bad Debt Expense Factor (“BADDEBT”)

$$BADDEBT_i = \frac{ACCT904_i}{\sum_{i=1}^{i=8} ACCT904_i}$$

$BADDEBT_i$ = **Bad Debt Expense Factor** for jurisdiction i.
 $ACCT904_i$ = Balance in Account 904 for jurisdiction i.

Customer Number Factor (“CN”)

$$CN_i = \frac{CUST_i}{\sum_{i=1}^{i=8} CUST_i}$$

where:

CN_i = **Customer Number Factor** for jurisdiction i.
 $CUST_i$ = Total Electric Customers for jurisdiction i.

Contributions in Aid of Construction (“CIAC”)

$$CIAC_i = \frac{CIACNA_i}{\sum_{i=1}^{i=8} CIACNA_i}$$

where:

$CIAC_i$ = **Contributions in Aid of Construction Factor** for jurisdiction i.
 $CIACNA_i$ = Contributions in Aid of Construction – Net additions for jurisdiction i.

Schedule M - Deductions (“SCHMD”)

$$SCHMD_i = \frac{DEPRC_i}{\sum_{i=1}^{i=8} DEPRC_i}$$

where:

$SCHMD_i$ = **Schedule M - Deductions (SCHMD) Factor** for jurisdiction i.
 $DEPRC_i$ = Depreciation in Accounts 403.1 - 403.9 for jurisdiction i.

Trojan Plant (“TROJP”)

$$TROJP_i = \frac{ACCT18222_i}{\sum_{i=1}^{i=8} ACCT18222_i}$$

where:

$TROJP_i$ = **Trojan Plant (TROJP) Factor** for jurisdiction i.
 $ACCT18222_i$ = Allocated Adjusted Balance in Account 182.22 for jurisdiction i.

Trojan Decommissioning (“TROJD”)

$$TROJD_i = \frac{ACCT22842_i}{\sum_{i=1}^{i=8} ACCT22842_i}$$

where:

$TROJD_i$ = **Trojan Decommissioning (TROJD) Factor** for jurisdiction i.
 $ACCT22842_i$ = Allocated Adjusted Balance in Account 228.42 for jurisdiction i.

Tax Depreciation (“TAXDEPR”)

$$TAXDEPR_i = \frac{TAXDEPRA_i}{\sum_{i=1}^{i=8} TAXDEPRA_i}$$

where:

$TAXDEPR_i$ = **Tax Depreciation (TAXDEPR) Factor** for jurisdiction i.
 $TAXDEPRA_i$ = Tax Depreciation allocated to jurisdiction i.

(Tax Depreciation is allocated based on functional pre merger and post merger splits of plant using Divisional and System allocations from above. Each jurisdiction’s total allocated portion of Tax depreciation is determined by its total allocated ratio of these functional pre and post merger splits to the total Company Tax Depreciation.)

Deferred Tax Expense (“DITEXP”)

$$DITEXP_i = \frac{DITEXPA_i}{\sum_{i=1}^{i=8} DITEXPA_i}$$

where:

$DITEXP_i$ = **Deferred Tax Expense (DITEXP) Factor** for jurisdiction i.
 $DITEXPA_i$ = Deferred Tax Expense allocated to jurisdiction i.

(Deferred Tax Expense is allocated by a run of PowerTax based upon the above factors. PowerTax is a computer software package used to track Deferred Tax Expense & Deferred Tax Balances. PowerTax allocates Deferred Tax Expense and Deferred Tax Balances to the states based upon a computer run which uses as inputs the preceding factors. If the preceding factors change, the factors generated by PowerTax change.)

Deferred Tax Balance (“DITBAL”)

$$DITBAL_i = \frac{DITBALA_i}{\sum_{i=1}^{i=8} DITBALA_i}$$

where:

$DITBAL_i$ = **Deferred Tax Balance (DITBAL) Factor** for jurisdiction i.
 $DITBALA_i$ = Deferred Tax Balance allocated to jurisdiction i.

(Deferred Tax Balance is allocated by a run of PowerTax based upon the above factors. PowerTax is a computer software package used to track Deferred Tax Expense & Deferred Tax Balances. PowerTax allocates Deferred Tax Expense and Deferred Tax Balances to the states based upon a computer run which uses as inputs the preceding factors. If the preceding factors change, the factors generated by PowerTax change.)

APPENDIX D

2010 Protocol - Appendix D Special Contracts

Special Contracts without Ancillary Service Contract Attributes

For allocation purposes Special Contracts without identifiable Ancillary Service Contract attributes are viewed as one transaction.

Loads of Special Contract customers will be included in all Load-Based Dynamic Allocation Factors.

When interruptions of a Special Contract customer's service occur, the reduction in load will be reflected in the host jurisdiction's Load-Based Dynamic Allocation Factors.

Actual revenues received from Special Contract customer will be assigned to the State where the Special Contract customer is located.

See example in Table 1

Special Contracts with Ancillary Service Contract Attributes

For allocation purposes Special Contracts with Ancillary Service Contract attributes are viewed as two transactions. PacifiCorp sells the customer electricity at the retail service rate and then buys the electricity back during the interruption period at the Ancillary Service Contract rate.

Loads of Special Contract customers will be included in all Load-Based Dynamic Allocation Factors.

When interruptions of a Special Contract customer's service occur, the host jurisdiction's Load-Based Dynamic Allocation Factors and the retail service revenue are calculated as though the interruption did not occur.

Revenues received from Special Contract customer, before any discounts for Customer Ancillary Service attributes of the Special Contract, will be assigned to the State where the Special Contract customer is located.

Discounts from tariff prices provided for in Special Contracts that recognize the Customer Ancillary Service Contract attributes of the Contract, and payments to retail customers for Customer Ancillary Services will be allocated among States on the same basis as System Resources.

See example in Table 2

Buy-through of Economic Curtailment

When a buy-through option is provided with economic curtailment, the load, costs and revenue associated with a customer buying through economic curtailment will be excluded from the calculation of State revenue requirements. The cost associated with the buy-through will be removed from the calculation of net power costs, the Special Contract customer load associated with the buy-through will be not be included in the calculation of Load-Based Dynamic Allocation Factors, and the revenue associated with the buy-through will not be included in State revenues.

2010 Protocol - Appendix D - Table 1
Interruptible Contract Without Ancillary Service Contract Attributes
Effect on Revenue Requirement

	<u>Factor</u>	<u>Total system</u>	<u>Jurisdiction 1</u>	<u>Jurisdiction 2</u>	<u>Jurisdiction 3</u>
1 Loads					
2	Jurisdictional Loads - No Interruptible Service				
3		72,000	24,000	36,000	12,000
4		42,000,000	14,000,000	21,000,000	7,000,000
5					
6	Jurisdictional Loads - With Interruptible Service - Reflecting Actual Interruptions				
7		71,700	24,000	35,700	12,000
8		41,962,500	14,000,000	20,962,500	7,000,000
9					
10	Special Contract Customer Revenue and Load - Non Interruptible Service				
11		\$ 20,000,000		\$ 20,000,000	
12		900	-	900	-
13		500,000	-	500,000	-
14					
15	Special Contract Customer Revenue and Load - With Interruptible Service (75 MW X 500 Hours of Interruption)				
16		\$ 16,000,000		\$ 16,000,000	
17				-	
18		\$ 16,000,000		\$ 16,000,000	
19		600	-	600	-
20		462,500	-	462,500	-
21					
22		\$4,000,000			
23					
24	Allocation Factors				
25	No Interruptible Service				
26	SE1	100.00%	33.33%	50.00%	16.67%
27	SC1	100.00%	33.33%	50.00%	16.67%
28	SG1	100.00%	33.33%	50.00%	16.67%
29					
30	With Interruptible Service (Reflecting Actual Physical Interruptions)				
31	SE2	100.00%	33.36%	49.96%	16.68%
32	SC2	100.00%	33.47%	49.79%	16.74%
33	SG2	100.00%	33.45%	49.83%	16.72%
34					
35					
36	No Interruptible Service				
37					
38	Cost of Service				
39	SE1	\$ 500,000,000	\$ 166,666,667	\$ 250,000,000	\$ 83,333,333
40	SG1	\$ 1,000,000,000	\$ 333,333,333	\$ 500,000,000	\$ 166,666,667
41		\$ 1,500,000,000	\$ 500,000,000	\$ 750,000,000	\$ 250,000,000
42					
43	Revenues				
44	Situs	\$ 20,000,000		\$ 20,000,000	
45	Situs	\$ 1,480,000,000	\$ 500,000,000	\$ 730,000,000	\$ 250,000,000
46					
47					
48	With Interruptible Service				
49					
50	Cost of Service				
51	SE2	\$ 498,000,000	\$ 166,148,347	\$ 248,777,480	\$ 83,074,173
52	SG2	\$ 998,000,000	\$ 334,058,577	\$ 496,912,134	\$ 167,029,289
53		\$ 1,496,000,000	\$ 500,206,924	\$ 745,689,614	\$ 250,103,462
54					
55	Revenues				
56	Situs	\$ 16,000,000		\$ 16,000,000	
57	Situs	\$ 1,480,000,000	\$ 500,206,924	\$ 729,689,614	\$ 250,103,462

2010 Protocol - Appendix D - Table 2
Interruptible Contract With Ancillary Service Contract Attributes
Effect on Revenue Requirement

	<u>Factor</u>	<u>Total system</u>	<u>Jurisdiction 1</u>	<u>Jurisdiction 2</u>	<u>Jurisdiction 3</u>
1 Loads					
2	Jurisdictional Loads - No Interruptible Service				
3		72,000	24,000	36,000	12,000
4		42,000,000	14,000,000	21,000,000	7,000,000
5					
6	Jurisdictional Loads - With Interruptible Service - Reflecting Actual Interruptions				
7		71,700	24,000	35,700	12,000
8		41,962,500	14,000,000	20,962,500	7,000,000
9					
10	Special Contract Customer Revenue and Load - Non Interruptible Service				
11		\$ 20,000,000		\$ 20,000,000	
12		900	-	900	-
13		500,000	-	500,000	-
14					
15	Special Contract Customer Revenue and Load - With Interruptible Service (75 MW X 500 Hours of Interruption)				
16		\$ 20,000,000		\$ 20,000,000	
17				\$ (4,000,000)	
18		\$ 16,000,000		\$ 16,000,000	
19		600	-	600	-
20		462,500	-	462,500	-
21					
22		\$4,000,000			
23					
24	Allocation Factors				
25	No Interruptible Service				
26	SE1	100.00%	33.33%	50.00%	16.67%
27	SC1	100.00%	33.33%	50.00%	16.67%
28	SG1	100.00%	33.33%	50.00%	16.67%
29					
30	With Interruptible Service (Reflecting Actual Physical Interruptions)				
31	SE2	100.00%	33.36%	49.96%	16.68%
32	SC2	100.00%	33.47%	49.79%	16.74%
33	SG2	100.00%	33.45%	49.83%	16.72%
34					
35					
36	No Interruptible Service				
37					
38	Cost of Service				
39	SE1	\$ 500,000,000	\$ 166,666,667	\$ 250,000,000	\$ 83,333,333
40	SG1	\$ 1,000,000,000	\$ 333,333,333	\$ 500,000,000	\$ 166,666,667
41		\$ 1,500,000,000	\$ 500,000,000	\$ 750,000,000	\$ 250,000,000
42					
43	Revenues				
44	Situs	\$ 20,000,000		\$ 20,000,000	
45	Situs	\$ 1,480,000,000	\$ 500,000,000	\$ 730,000,000	\$ 250,000,000
46					
47					
48	With Interruptible Service & Ancillary Service Contract				
49					
50	Cost of Service				
51	SE1	\$ 498,000,000	\$ 166,000,000	\$ 249,000,000	\$ 83,000,000
52	SG1	\$ 998,000,000	\$ 332,666,667	\$ 499,000,000	\$ 166,333,333
53	SG1	\$ 2,000,000	\$ 666,667	\$ 1,000,000	\$ 333,333
54	SE1	\$ 2,000,000	\$ 666,667	\$ 1,000,000	\$ 333,333
55		\$ 1,500,000,000	\$ 500,000,000	\$ 750,000,000	\$ 250,000,000
56					
57	Revenues				
58	Situs	\$ 20,000,000		\$ 20,000,000	
59	Situs	\$ 1,480,000,000	\$ 500,000,000	\$ 730,000,000	\$ 250,000,000

APPENDIX E

2010 Protocol - Appendix E
6 Year Levelized ECD Hydro Endowment Fixed Dollar Proposal
Revenue Requirement (\$000)

	Total	California	Oregon	Washington	Utah	Idaho	Wyoming	FERC
2011								
Klamath Surcharge Situs	(1)	1,062	11,496	(1,286)	(7,272)	(976)	(2,955)	(70)
ECD Hydro	(0)	(23)	(6,851)	(745)	6,240	836	484	60
Total	(1)			(2,031)	(1,032)	(140)	(2,471)	(10)
2012								
Klamath Surcharge Situs	(1)	1,062	11,496	(1,286)	(7,272)	(976)	(2,955)	(70)
ECD Hydro	(0)	(23)	(6,851)	(745)	6,240	836	484	60
Total	(1)			(2,031)	(1,032)	(140)	(2,471)	(10)
2013								
Klamath Surcharge Situs	(1)	1,062	11,496	(1,286)	(7,272)	(976)	(2,955)	(70)
ECD Hydro	(0)	(23)	(6,851)	(745)	6,240	836	484	60
Total	(1)			(2,031)	(1,032)	(140)	(2,471)	(10)
2014								
Klamath Surcharge Situs	(1)	1,062	11,496	(1,286)	(7,272)	(976)	(2,955)	(70)
ECD Hydro	(0)	(23)	(6,851)	(745)	6,240	836	484	60
Total	(1)			(2,031)	(1,032)	(140)	(2,471)	(10)
2015								
Klamath Surcharge Situs	(1)	1,062	11,496	(1,286)	(7,272)	(976)	(2,955)	(70)
ECD Hydro	(0)	(23)	(6,851)	(745)	6,240	836	484	60
Total	(1)			(2,031)	(1,032)	(140)	(2,471)	(10)
2016								
Klamath Surcharge Situs	(1)	1,062	11,496	(1,286)	(7,272)	(976)	(2,955)	(70)
ECD Hydro	(0)	(23)	(6,851)	(745)	6,240	836	484	60
Total	(1)			(2,031)	(1,032)	(140)	(2,471)	(10)
6 Year NPV								
2011-2016 @ 7.36%								
Klamath Surcharge Situs	(3)	5,008	54,194	(6,064)	(34,278)	(4,601)	(13,932)	(330)
ECD Hydro	(0)	(106)	(32,298)	(3,511)	29,414	3,939	2,281	281
Total	(3)			(9,575)	(4,864)	(662)	(11,650)	(49)

APPENDIX F

2010 Protocol - Appendix F Methodology for Determining Mid-C (MC) Factor

Energy for each Mid-C contract is allocated as follows to determine the MC factor.

- Priest Rapids energy is assigned 100% to Oregon.
- Rocky Reach energy is allocated on the SG factor.
- Wanapum energy is assigned to Oregon and Washington based upon each state's respective share of the SG factor.
 - Wanapum energy assigned to Oregon = Oregon SG / (total Oregon and Washington SG).
 - Wanapum energy assigned to Washington = Washington SG / (total Oregon and Washington SG).
- Wells energy is allocated on the SG factor.
- The Grant replacement contracts begin at the time the Priest Rapids contract terminates. The energy from these contracts is assigned to Oregon through October 31, 2009.
- Effective November 1, 2009, the date the Wanapum contract expires, the Grant replacement contract energy is divided into two pieces based on PacifiCorp's share of the nameplate of Priest Rapids and Wanapum as shown in the following calculation:

	Nameplate Capacity MW	PacifiCorp's Share - %	PacifiCorp's Share of Nameplate - MW	PacifiCorp's Share of Nameplate - %
Priest Rapids	789	13.9%	110	41.35%
Wanapum	831	18.7%	155	58.65%
	1,620		265	100.00%

- The Priest Rapids portion of the Grant County replacement contracts is 41.35%. The energy associated with the Grant County replacement contracts for Priest Rapids is assigned 100% to Oregon.
- The Wanapum portion of the Grant County replacement contracts is 58.65%. The energy associated with the Grant County replacement contracts for Wanapum is assigned to Washington based on the ratio of the Washington SG factor to the sum of the Oregon and Washington SG factors. The remaining energy from the Wanapum portion is assigned to Oregon.

After all of the energy from the Mid-Columbia Contracts has been assigned or allocated to each State, then the MC factor is created by dividing each State's energy by the total energy associated with the Mid-Columbia Contracts. The MC factor is used to allocate the Mid-Columbia Contract embedded cost differential to each State.

