

July 1, 2011

VIA OVERNIGHT DELIVERY

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Attention: David W. Danner
Executive Director and Secretary

Pursuant to RCW 80.28.050 and 80.28.060 and the Washington Utilities and Transportation Commission's (Commission) Rules and Regulations, PacifiCorp, dba Pacific Power & Light Company, (PacifiCorp or the Company) transmits for filing and approval by the Commission copies of the proposed new tariff sheets applicable to electric service supplied by the Company in the state of Washington to become effective on July 31, 2011. In accordance with WAC 480-07-510(2), a copy of the proposed new tariff sheets is provided in legislative format.

By the enclosed tariff sheets, PacifiCorp requests an increase in revenues from Washington operations resulting in an overall price change of 4.3 percent or \$12.9 million. The proposed new tariff sheets are contained in Exhibit No. ___ (WRG-2) accompanying this filing. The filing is based on a historic test period of the 12-months ended December 31, 2010, adjusted for limited known and measurable changes. Consistent with Commission precedent, the Company's net power costs are based on a forecast for the 12-months ending May 31, 2013, aligned with the rate effective period.

Also enclosed pursuant to WAC 480-07-510(1) are nineteen (19) paper copies of the Company's Application and all testimony and exhibits that the Company intends to present as its direct case. One copy of the testimony and exhibits in electronic format is also included. Please note that one piece of the Company's testimony is marked as "confidential" and is provided confidentially in accordance with the requirements of WAC 480-07-160(3): Direct Confidential Testimony of Cindy Crane, Exhibit No. ___ (CAC-1CT). Concurrent with this filing, the Company has filed a request for a protective order in accordance with WAC 480-07-420.

As required by WAC 480-07-510(3), enclosed please find copies of supporting workpapers. Provided in electronic format on an enclosed CD. Where feasible, hardcopies have been provided; however, due to the considerable size and format of the documents, many documents are provided only in electronic format. Certain workpapers/models are being provided as confidential under WAC 480-07-160(3).

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As required by WAC 480-07-510(7), also enclosed are one copy of the following: the Company's most recent FERC Form 1, the Company's Form 10Ks and Form 10Qs, as well as the most recent bond issuance prospectus. There are no annual or quarterly reports to shareholders.

Pursuant to WAC 480-100-194, the Company agrees to suspend its tariff filing and will provide notice pursuant to WAC 480-100-197. Accordingly, the notice provisions of WAC 480-100-194 are not required for this filing.

The Company respectfully requests that all formal correspondence and data requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

In addition, please send copies of correspondence and communication in this case to:

Andrea L. Kelly
Vice President, Regulation
PacifiCorp
825 NE Multnomah, Ste 2000
Portland, OR 97232
Telephone: (503) 813-6043
Facsimile: (503) 813-6438
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and

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and

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Attached as Attachment A is a listing of the tariff sheets proposed to be revised. Attachment B is the Printed Index for all electronic files of this filing.

Sincerely,

A handwritten signature in black ink that reads "Andrea Kelly" with a stylized flourish at the end.

Andrea L. Kelly
Vice President, Regulation

Enclosures

cc. Service List

The proposed tariff sheets to be revised in the Company's currently effective Tariff WN-U-75 are designated as follows:

First Revision of Sheet No. Index.2		Tariff Index
First Revision of Sheet No. 15.1	Schedule 15	Outdoor Area Lighting Service – No New Service
First Revision of Sheet No. 16.1	Schedule 16	Residential Service
First Revision of Sheet No. 17.1	Schedule 17	Low Income Bill Assistance Program – Residential Service Optional for Qualifying Customers
First Revision of Sheet No. 18.1	Schedule 18	Three Phase Residential Service Rider
First Revision of Sheet No. 24.1	Schedule 24	Small General Service
First Revision of Sheet No. 24.2	Schedule 24	Small General Service
First Revision of Sheet No. 36.1	Schedule 36	Large General Service – Less than 1,000 kW
First Revision of Sheet No. 36.2	Schedule 36	Large General Service – Less than 1,000 kW
First Revision of Sheet No. 40.1	Schedule 40	Agricultural Pumping Service
First Revision of Sheet No. 40.2	Schedule 40	Agricultural Pumping Service
First Revision of Sheet No. 48T.1	Schedule 48T	Large General Service – Metered Time of Use 1,000 kW and Over
First Revision of Sheet No. 51.1	Schedule 51	Street Lighting Service – Company-Owned Service
First Revision of Sheet No. 52.1	Schedule 52	Street Lighting Service – Company-Owned System – No New Service
First Revision of Sheet No. 53.1	Schedule 53	Street Lighting Service – Customer-Owned System
First Revision of Sheet No. 54.1	Schedule 54	Recreational Field Lighting - Restricted
First Revision of Sheet No. 57.1	Schedule 57	Mercury Vapor Street Lighting Service – No New Service
First Revision of Sheet No. 57.2	Schedule 57	Mercury Vapor Street Lighting Service – No New Service
First Revision of Sheet No. 91	Schedule 91	Surcharge to Fund Low Income Bill Assistance Program

PacifiCorp (dba Pacific Power & Light Company) "PAC"
General Rate Case Filing
Index of Files on CDs
July 1, 2011

CD 1. WA UE-11_ General Rate Case Initial Filing and Workpapers

- A. UE-11_PAC Index of Files on CD (Jul 2011)
- B. UE-11_PAC Cover Letter (Jul 2011)
- C. UE-11_PAC Application and Summary (Exhibit A)(Jul 2011)
- D. UE-11_PAC Certificate of Service (Jul 2011)
- E. UE-11_PAC Tariffs (Jul 2011)
 - Clean
 - Legislative
- F. UE-11_PAC Other (Jul 2011)
 - UE-11_PAC 10Q's and 10K's
 - UE-11_PAC FERC Form 1
 - UE-11_PAC Debt Issuance Prospectus
- G. UE-11_PAC Workpapers (Jul 2011)
 - UE-11_Workpaper Index (PACJul2011)
 - Kelly Workpapers
 - Williams Workpapers
 - Duvall Workpapers
 - Dalley Workpapers
 - Meredith Workpapers
 - Griffith Workpapers

CD 2. WA UE-11_PAC Testimony and Exhibits

- A. UE-11_Kelly Testimony and Exhibits(PACJul2011)
- B. UE-11_Williams Testimony and Exhibits (PACJul2011)
- C. UE-11_Duvall Testimony and Exhibits (PACJul2011)
- D. UE-11_Crane Testimony and Exhibits (PACJul2011)
- E. UE-11_Dalley Testimony and Exhibits (PACJul2011)
- F. UE-11_Meredith Testimony and Exhibits (PACJul2011)
- G. UE-11_Griffith Testimony and Exhibits (PACJul2011)

CD 3. WA UE-11_Confidential Testimony(PACJul2011)

- A. UE-11_Confidential Testimony (PACJul2011)
 - UE-11_Crane Confidential Testimony (PACJul2011)

CD 4. WA UE-11_Confidential Workpapers (PACJul2011)

- UE-11_Workpaper Index (PACJul2011)
- Confidential Williams Workpapers
- Confidential Duvall Workpapers
- Confidential Crane Workpapers
- Confidential Dalley Workpapers

CERTIFICATE OF SERVICE

I certify that I have cause to be served the foregoing document, via Overnight Delivery, to the following:

Industrial Customers of Northwest Utilities

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The Energy Project

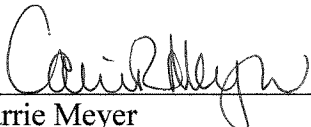
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DATED this 1st day of July, 2011



Carrie Meyer
Coordinator, Regulatory Operations

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

vs.

PACIFICORP d.b.a. PACIFIC POWER &
LIGHT COMPANY,

Respondent.

DOCKET UE- 11_____

APPLICATION

1 Pursuant to RCW 80.28.050, RCW 80.28.060 and in accordance with WAC 480-07-510, PacifiCorp d.b.a. Pacific Power & Light Company (PacifiCorp or Company), files a general rate increase to revise its tariff schedules to adjust prices for its Washington electric customers.

2 The Company is an electric company and public service company in the state of Washington within the meaning of RCW 80.04.010, and is subject to the Washington Utilities and Transportation Commission's (Commission) jurisdiction with respect to its prices and terms of electric service to retail customers in Washington. The Company provides electric service to approximately 131,000 retail customers in the state of Washington and approximately 1.7 million total retail customers in Washington, California, Idaho, Oregon, Utah and Wyoming.

3

Communications regarding this filing should be addressed to:

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Attorneys for PacifiCorp

Communications regarding discovery matters, including data requests issued to the

Company should be addressed to:

Data Request Response Center
PacifiCorp
825 NE Multnomah, Ste 2000
Portland, OR 97232
Email: datarequest@pacificorp.com

4

In the Company's last general rate case, Docket UE-100749 (2010 Rate Case), the Company sought an increase of \$56.7 million, or 20.88 percent, which was reduced over the course of the proceeding to \$47.7 million, or 17.6 percent. In Order 06 issued March 25, 2011, the Commission authorized a \$38 million or 13.9 percent, base rate increase, effective April 3, 2011. Pursuant to the Notice Responding to Informal Request for Clarification issued by Administrative Law Judge Patricia Clark dated March 30, 2011, PacifiCorp's compliance filing dated March 30, 2011 provided for a \$33.5 million or 12.3

percent base rate increase. The Commission also ordered establishment of a prospective “tracker” for renewable energy credit revenue of \$4.8 million or 1.5 percent for the rate period. Finally, the Commission authorized a return on equity (ROE) of 9.8 percent and an equity component of 49.1 percent, for an overall rate of return of 7.81 percent.

5 PacifiCorp is currently earning a ROE of 4.6 percent on an unadjusted basis and 7.6 percent on a normalized basis in Washington for the test period, which is the 12-months ended December 2010, adjusted for limited known and measurable changes. For an opportunity to achieve the 9.8 percent ROE authorized by the Commission in the 2010 Rate Case, a rate increase of \$12.9 million or 4.3 percent is necessary. The revised tariff schedules submitted with this filing reflect an increase in this amount.

6 This limited rate relief request represents a “make-whole” filing which does not re-litigate issues decided by the Commission in the 2010 Rate Case, does not propose any changes to ratemaking methodologies, and includes limited known and measurable changes from actual historic cost levels. The Company has structured its filing in a manner to minimize controversy and encourage expeditious resolution – while still providing an opportunity to reflect in rates the increases in costs prudently incurred to serve its customers in Washington. Because the Company’s last rate case was fully litigated, and because the effective date of new rates in that case was within 90 days of this filing, a “make whole” filing is appropriate in these circumstances. The Company reserves its right to fully contest all issues in future cases where the circumstances will be different.

8 There is Commission precedent for approving rate increases based on similar filings. For example, in Docket UE-061546 the Company requested a rate increase in October of 2006 to achieve the ROE previously authorized by the Commission in April of 2006 in Docket UE-050684.¹ Similar to the present filing, the Company's 2006 rate case did not contest the previously authorized cost of equity and capital structure but updated the cost of long-term debt and preferred equity, did not re-litigate many of the issues decided by the Commission in the previous case and included only a limited number of *pro forma* adjustments.²

9 The proposed rate increase in this case is based upon normalized Results of Operations for Washington for the test period, a historic 12-month period ended December 31, 2010, adjusted for limited known and measurable changes. Consistent with Commission precedent, the Company's net power costs are based on *pro forma* net power costs for the 12-months ending May 31, 2013, which is tied to the rate effective period, and adjusted to match the test year load level using the Commission- approved production factor.

10 The tariff sheets reflect a proposed effective date of July 31, 2011, which allows for the required thirty (30) days under RCW 80.28.060 following the submittal of a tariff filing. The Company agrees to the suspension of its filing under WAC 480-100-194 and that it will provide notice pursuant to WAC 480-100-197. Accordingly, the notice provisions of WAC 480-100-194 are not required for this filing.

¹ See *Wash. Utils. & Transp. Comm'n v. PacifiCorp*, Docket UE-050684, Order 04 (April 17, 2006).

² The Commission also approved a rate increase in 1994 for Washington Natural Gas Company based on a "make-whole" filing. See *Wash. Utils. & Transp. Comm'n v. Washington Natural Gas Company*, Docket UG-931405, Fourth Supplemental Order (May 27, 1994).

The Company's inability to earn its authorized rate return and its need for this rate increase is primarily driven by the following cost increases and revenue decreases that were not reflected in the test period of the 2010 Rate Case:

Net power costs. This increase is primarily driven by increases in purchase power expenses, coal costs related to the Jim Bridger plant, the removal of the Condit hydroelectric facility, and decreased revenues from wholesale sales. The increase in purchase power is largely due to expiring low-cost long term wholesale purchase power contracts. Customers have benefitted from low-cost contracts for many years but, as they expire, the Company must replace them at current market prices. Although current market prices are comparatively low, they are nonetheless higher than the old contract prices they are replacing, resulting in higher net power costs. Also, coal costs have increased at the Jim Bridger plant, offset partially by reduced coal generation. In addition, the Company has received final approvals to move forward with the decommissioning and removal of the 14.7 megawatt Condit hydroelectric facility, located in south-central Washington on the White Salmon River. This is scheduled to begin in the fall of 2011.

The overall net power cost increase is mitigated by decreases in natural gas expenses, the expiration of certain wheeling contracts and a reduction in wind integration costs.

Investment in the system. The Company continues to have ongoing investment needs in transmission and distribution plant steam and hydroelectric generation facilities in order to serve its Washington customers safely and

reliably. The filing also captures a full year of costs for investments brought into service in the 2010 Rate Case.

Similar to the Company's last two general rate cases, this case does not include any major resource additions. Instead, the investments are those that are ongoing in nature to maintain and improve the Company's infrastructure. Some of the projects included in the test year include the automated meter reader (AMR) project, routine distribution and transmission line upgrades and replacements, and Jim Bridger investments related to emission controls, turbine upgrades and reheater replacements.

Retail and Other Revenues. For the period ended December 2010, normalized retail revenues have decreased by approximately \$3.3 million from the level authorized in the 2010 Rate Case. Although the residential loads increased between 2009 and 2010, the commercial, industrial and irrigations loads decreased year-on-year. The decreases are due to a combination of the economic downturn, increases in demand-side management programs, and a wetter and cooler irrigation season.

The proposed rate increase is mitigated by the Company's proactive and aggressive efforts to control operations and maintenance and administrative and general costs. The proposed rate increase is also mitigated by the Company's decision to accept for this case only the resolution of the contested issues in the 2010 Rate Case.

12 Based upon the results of the updated Cost of Service study and consistent with Order 06 in the 2010 Rate Case, the Company proposes to spread the proposed revenue

increase across customer classes with an increase of 4.3 percent for all classes, except public street lighting customers, for which the Company proposes an increase of 1.0 percent. This method produces similar results to the final Cost of Service study in the 2010 Rate Case. Moreover, this method is consistent with the Company's decision to limit the number of contested issues in this case.

13 In Docket UE-061546, Order No. 08, issued June 21, 2007, the Commission approved the West Control Area allocation methodology for a trial period of five years. The Company's filing uses the West Control Area allocation methodology consistent with the approved five-year trial period.

14 The Company's direct case consists of the testimony and exhibits of seven witnesses:

(a) **Andrea L. Kelly**, Vice President of Regulation, provides an overview of the Company's request for an increase in its base electric rates and the major factors driving the need for the rate increase. She also discusses the Company's efforts to mitigate the rate increase as well as the Company's decision to file a make-whole case.

(b) **Bruce N. Williams**, Vice President and Treasurer, discusses the updated calculation of PacifiCorp's cost of debt and preferred stock.

(c) **Gregory N. Duvall**, Director, Net Power Costs, describes the Company's net power costs and discusses the primary drivers and efforts to mitigate the increase in net power costs. He also presents the Company's 2011 Wind Integration Study and describes the modeling of net power costs under the West Control Area allocation method.

(d) **Cindy A. Crane**, Vice President, Interwest Mining Company and Fuel Resources for PacifiCorp Energy, explains the reasons for increases in coal costs and also examines the Company's efforts to manage adverse coal quality at the Jim Bridger plant associated with Bridger Coal's underground mining operations.

(e) **R. Bryce Dalley**, Manager, Revenue Requirements, presents the Company's overall revenue requirement based on the historic 12-month period ended December 31, 2010. He also presents the limited restating and *pro forma* known and measurable adjustments to historic results related to revenue, operations and maintenance expense, net power costs, depreciation and amortization, taxes and rate base.

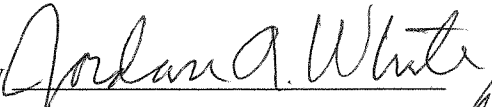

(f) **Robert M. Meredith**, Senior Analyst, Cost of Service and Pricing, presents the Company's cost of service study.

(g) **William R. Griffith**, Director, Pricing, Cost of Service and Regulatory Operations, presents the Company's proposed rate spread and changes in price design for the affected rate schedules.

15 Pursuant to WAC 480-07-510(4), attached as Exhibit A is the Summary Document setting forth the information required to be filed in connection with applications for general rate increases.

DATED: July 1, 2011.

Respectfully Submitted,

By 
Jordan A. White
Senior Counsel
Pacific Power & Light Company 

PACIFICORP

Exhibit A

Summary of Requested Electric General Rate Increase

Washington Jurisdiction

Filed July 1, 2011

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- 1) **The date and amount of the latest prior general rate increase authorized by the Commission, and the revenue realized from that authorized increase in the test period, based on the company's test period units of revenue.**

Date:	April 3, 2011
Amount:	\$33,500,000
Amount Realized in the test period:	\$0

- 2) **Total revenues at present rates and at requested rates.**

Present Rates	\$303,193,000
Requested Rates	\$316,141,000

- 3) **Requested revenue change in percentage, in total and by major customer class**

Residential	4.3%
Commercial & Industrial	4.3%
Public Street Lighting	1.0%
Total	4.3%

- 4) **Requested revenue change in dollars, in total and by major customer class**

Residential	\$5,918,000
Commercial & Industrial	\$7,011,000
Public Street Lighting	\$ 18,000
Total	\$12,947,000

- 5) **Requested rate change in dollars per month, per average residential customer.**

Monthly impact at average usage of 1,300 kWh per month - \$4.65

6) **Most current customer count by major customer class.**

Residential	103,965
Commercial & Industrial	24,817
Public Street Lighting	3,073
Total	131,855

Twelve-months ended December 31, 2010.

7) **Current authorized overall rate of return and authorized rate of return on common equity.**

Overall rate of return (UE-100749)	7.81%
Rate of return on common equity (UE-100749)	9.8%

8) **Requested overall rate of return and requested rate of return on common equity, and the method or methods used to calculate rate of return on common equity.**

Overall rate of return	7.74%
Rate of return on common equity	9.8%

Method(s) of calculation:

See *Wash.Util. & Transp. Comm'n v. PacifiCorp*, Docket UE-100749, Order 06 at pp. 32-39 (March 25, 2011).

9) **Requested capital structure.**

Long-term Debt	50.6%
Preferred stock	0.3%
Common Equity	49.1%

10) **Requested total net operating income.**

Net operating income:	\$58,088,000
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11) **Requested total rate base and method of calculation, or equivalent.**

Rate base:	\$750,496,000
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Method of calculation: Average of Monthly Averages ("AMA").

12) **Requested revenue effect of attrition allowance, if any requested.**

Attrition allowance requested: None.