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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF PACIFICORP DBA	)	
ROCKY MOUNTAIN POWER'S PETITION TO	)	CASE NO. PAC-E-07-13
REVISE THE PUBLISHED AVOIDED COST	)	
RATES TO INCLUDE MONTHLY PRICE	)	
MULTIPLIERS TO DIFFERENTIATE FOR	)	COMMENTS OF THE
ENERGY DELIVERED DURING HEAVY LOAD	)	COMMISSION STAFF
HOURS AND LIGHT LOAD HOURS.	)	
	)	

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Scott Woodbury, Deputy Attorney General, and in response to the Notice of Petition, Notice of Modified Procedure and Notice of Comment/Protest Deadline issued on June 27, 2007 in Case No. PAC-E-07-13, submits the following comments.

BACKGROUND

On June 18, 2007, PacifiCorp dba Rocky Mountain Power (Company) filed a Petition with the Idaho Public Utilities Commission (Commission) requesting authority to revise its published avoided cost rates for qualifying facilities (QFs) under Sections 201 and 210 of the Public Utility Regulatory Policies Act of 1978 (PURPA) to include monthly price multipliers to recognize the monthly difference in value between energy delivered by QFs during heavy load hours (HLH) and energy delivered during light load hours (LLH).

As reflected in PacifiCorp's Petition, at the present time, the Company pays the same price to a QF that delivers energy entirely during light load hours as it pays to a QF that delivers entirely during heavy load hours. Likewise, the Company pays the same price to a QF that delivers entirely in a peak load month as it pays to a QF that delivers entirely in a non-peak load month. PacifiCorp believes that the existing payment structure is inappropriate, as it does not provide proper incentives to QFs, and is neither fair to customers nor to the QF because it could result in either under- or over-payments for the value of the power.

The Company's proposed heavy load hour and light load hour monthly price multipliers are reflected below.

Month	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
HLH	103%	105%	95%	95%	92%	94%	121%	121%	109%	115%	110%	129%
LLH	94%	97%	80%	76%	63%	65%	92%	106%	99%	105%	96%	120%

Note: These monthly price multipliers are derived from:

- (1) 48 months of historical daily Dow Jones firm market data for the COB, Four Corners, Mid-Columbia and Palo Verde wholesale market hubs. The 48-months reflected in this analysis is from April 1, 2003 through to and including March 31, 2007; and
- (2) 48 months of system balancing data extracted from two GRID scenarios; a Base Case and an Avoided Cost Case. The 48 months reflected in these studies is from January 1, 2007 through to and including December 31, 2010.

These multipliers are subject to change if different 48-month periods are selected.

STAFF ANALYSIS

Since PURPA was first implemented in Idaho over 25 years ago, the Commission has permitted Idaho Power and Avista to shape their QF purchase rates to address the difference in energy values between the various seasons of the year. This "seasonalization" of the avoided cost rates recognizes that energy delivered by QFs has different values based on when it is delivered. Idaho Power's rates have three "seasons," while Avista's have two. Recently, both utilities have sought to further refine their avoided cost rates by recognizing the difference in value on a daily basis. This difference in value between heavy load hours and light load hours was the basis for

the daily shape adjustment that was recently approved for Avista in Commission Order No. 30111 issued in Case No. AVU-E-06-4. Idaho Power requests a similar daily shape adjustment in Case No. IPC-E-07-04. A decision in that case is still pending.

Now, like the other two utilities, PacifiCorp is seeking to implement a series of monthly price multipliers that will recognize seasonal differences in energy value as well as daily differences between heavy and light load hours. The Company has never had either seasonal or daily adjustments to its avoided cost rates before in Idaho.

PacifiCorp's proposal differs slightly from the other two utilities in two respects. First, rather than breaking the year into two or three seasons, PacifiCorp is proposing a different price multiplier for each month. Second, rather than a fixed difference between heavy and light load hour rates, the Company proposes monthly differences. Thus, there are two different price multipliers for each month – one for heavy load hours and one for light load hours, or a total of 24 different price multipliers throughout the year. The price multipliers have been derived from an analysis of historical price differences at four trading hubs where PacifiCorp frequently transacts.

As reflected in the Company's Petition, this revision would not change the computation of avoided cost but could change the total revenues received by QFs depending on which month and when during the day they deliver energy. For example, projects that generate more during on-peak hours would receive greater revenue than if no price multipliers were applied, and projects that generate more during off-peak hours would generate less revenue. Projects with a flat generation shape spread evenly throughout the year and the day would receive the same revenue and be unaffected by the price multipliers. The price multipliers would, of course, only be applied to new contracts; therefore, existing PURPA contracts would be unaffected.

The proposed price multipliers are not a precise way to adjust avoided cost rates to reflect the value of power at the time of delivery. They simply provide approximate adjustments that acknowledge that the value of power depends on the timing of its delivery and produce rates that are closer to real-time rates than if no adjustments were made. The proposed price multipliers provide incentive for power producers to deliver power during hours and months when it is more valuable to the Company.

The price multipliers proposed by PacifiCorp range from a low of 63 percent during light load hours in May, to a high of 121 percent during heavy load hours in July. On average over the course of the year, the difference in heavy and light load hour prices is \$7.18. This compares

closely to Staff's proposed daily shape adjustment for Idaho Power of \$7.28, and is not too different from the \$5 per MWh daily shape adjustment approved for Avista.

There are several possible disadvantages to the price multipliers proposed by PacifiCorp. First, the price multipliers could introduce greater uncertainty in the monthly payments QFs would receive because some, particularly wind generators, have no way of accurately knowing how many kilowatt-hours their project will produce either on a monthly basis or in on-peak vs. off-peak hours. Another disadvantage is the need for hourly metering capability at all future projects. Finally, the adoption of a series of 24 price multipliers introduces additional complexity into an already fairly complex system of avoided cost rates.

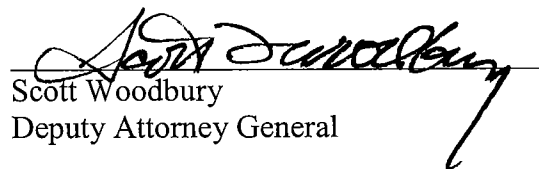
Despite these possible disadvantages, however, Staff is supportive of the concept of seasonal and daily price multipliers because, although only approximate, they create rates that more closely match avoided cost rates to the true value of power at the time of delivery.

Attachment A shows the non-levelized rates that would result if the Company's proposal is approved. Attachment B shows the levelized rates for 2007-2009.

RECOMMENDATIONS

Staff recommends approval of PacifiCorp's Petition to include monthly price multipliers to recognize the monthly difference in value between energy delivered by QFs during heavy load hours and energy delivered during light load hours.

Respectfully submitted this 27th day of July 2007.


Scott Woodbury
Deputy Attorney General

Technical Staff: Rick Sterling

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PACIFICORP

AVOIDED COST RATES FOR NON-FUELED PROJECTS

TEN AVERAGE MEGAWATTS OR SMALLER

Monthly Weighting Factors	
	LLH
JAN	103%
FEB	105%
MAR	95%
APR	92%
MAY	94%
JUN	121%
JUL	121%
AUG	109%
SEP	105%
OCT	110%
NOV	129%
DEC	120%

Non-Levelized Rate Structure

Year	Non Levelized Flat Price (PUC 29648)	January		February		March		April		May		June	
		Heavy Load Hour Price 103%	Light Load Hour Price 94%	Heavy Load Hour Price 105%	Light Load Hour Price 97%	Heavy Load Hour Price 95%	Light Load Hour Price 80%	Heavy Load Hour Price 95%	Light Load Hour Price 76%	Heavy Load Hour Price 92%	Light Load Hour Price 63%	Heavy Load Hour Price 94%	Light Load Hour Price 65%
2007	53.80	55.41	50.37	56.49	52.18	51.11	43.04	51.11	46.07	49.49	33.89	50.57	34.97
2008	55.03	56.68	51.64	57.79	53.38	52.28	44.03	52.28	47.24	50.63	34.67	51.73	35.77
2009	56.30	57.99	52.95	59.11	54.61	53.48	45.04	53.48	48.44	51.80	35.47	52.92	36.59
2010	57.59	59.32	54.28	60.47	55.87	54.71	46.08	54.71	49.67	52.99	36.28	54.14	37.44
2011	58.92	60.89	55.65	61.85	56.82	55.97	47.13	55.97	50.93	54.21	37.12	55.38	38.30
2012	60.27	62.09	57.04	63.29	58.47	57.26	48.22	57.26	52.22	55.45	37.97	56.66	39.18
2013	61.66	63.51	58.47	64.74	59.81	58.58	49.33	58.58	53.54	56.73	38.85	57.96	40.08
2014	63.08	64.97	59.93	66.23	61.19	59.93	50.46	59.93	54.89	58.03	39.74	59.29	41.00
2015	64.53	66.47	61.43	67.76	62.72	61.30	51.62	61.30	56.26	59.37	40.65	60.66	41.95
2016	66.02	68.00	62.96	69.32	64.28	62.72	52.81	62.72	57.68	60.73	41.59	62.06	42.91
2017	67.54	69.56	64.52	70.91	65.87	64.16	54.03	64.16	59.12	62.13	42.55	63.48	43.90
2018	69.09	71.16	66.12	72.54	67.50	65.64	55.27	65.64	60.60	63.56	43.53	64.94	44.91
2019	70.68	72.80	67.76	74.21	69.17	67.15	56.54	67.15	62.11	65.03	44.53	66.44	45.94
2020	72.31	74.48	69.44	75.92	70.88	68.69	57.85	68.69	63.65	66.52	45.55	67.97	47.00
2021	73.97	76.19	71.15	77.67	72.63	70.27	59.18	70.27	65.23	68.05	46.60	69.53	48.08
2022	75.68	77.95	72.91	79.46	74.42	71.89	60.54	71.89	66.85	69.62	47.68	71.14	49.19
2023	77.42	79.74	74.70	81.29	76.25	73.55	61.94	73.55	68.51	71.23	48.77	72.77	50.32
2024	79.20	81.58	76.54	83.16	78.12	75.24	63.36	75.24	70.20	72.87	49.90	74.45	51.48
2025	81.03	83.46	78.42	85.08	80.04	76.97	64.82	76.97	71.93	74.54	51.05	76.16	52.67
2026	82.89	85.38	80.34	87.04	82.00	78.75	66.31	78.75	73.71	77.02	52.22	77.92	53.86
2027	84.80	87.35	82.31	89.04	84.00	80.56	67.84	80.56	75.52	79.02	53.43	79.71	55.12
2028	86.76	89.36	84.32	91.09	86.05	82.42	69.41	82.42	77.38	79.82	54.66	81.55	56.39
2029	88.76	91.42	86.38	93.19	88.15	84.32	70.00	84.32	79.28	81.65	55.92	83.43	57.69

July				August				September				October				November				December			
Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price	
Price	121%	Less Wind Integration Cost Adjustment of:	92%	Price	121%	Less Wind Integration Cost Adjustment of:	106%	Price	109%	Less Wind Integration Cost Adjustment of:	99%	Price	115%	Less Wind Integration Cost Adjustment of:	105%	Price	110%	Less Wind Integration Cost Adjustment of:	96%	Price	123%	Less Wind Integration Cost Adjustment of:	120%
55.09	60.05	49.49	44.45	55.09	60.05	49.49	44.45	58.64	53.60	48.22	48.22	61.87	56.83	56.49	51.45	59.18	54.14	51.64	46.60	69.40	64.36	64.56	59.52
66.59	61.55	50.63	45.59	66.59	61.55	50.63	45.59	59.99	54.95	49.44	49.44	63.29	58.25	57.79	52.75	60.54	55.50	52.83	47.79	70.99	65.95	66.04	61.00
68.12	63.08	51.80	46.76	68.12	63.08	51.80	46.76	61.37	56.33	50.70	50.70	64.74	59.70	59.11	54.07	61.93	56.89	54.05	49.01	72.63	67.59	67.56	62.52
69.69	64.65	52.99	47.95	69.69	64.65	52.99	47.95	62.78	57.74	51.98	51.98	66.23	61.19	60.47	55.43	63.35	58.31	55.29	50.25	74.30	69.26	69.11	64.07
71.29	66.25	54.21	49.17	71.29	66.25	54.21	49.17	64.22	59.18	53.29	53.29	67.76	62.72	61.86	56.82	64.81	59.77	56.56	51.52	76.01	70.97	70.70	65.66
72.93	67.89	55.45	50.41	72.93	67.89	55.45	50.41	65.70	60.66	54.63	54.63	69.32	64.28	63.29	58.25	66.30	61.26	57.86	52.82	77.75	72.71	72.33	67.29
74.61	69.57	56.73	51.69	74.61	69.57	56.73	51.69	67.21	62.17	56.00	56.00	70.91	65.87	64.74	59.70	67.83	62.79	59.19	54.15	79.54	74.50	73.99	68.95
76.33	71.29	58.03	52.99	76.33	71.29	58.03	52.99	68.76	63.72	57.41	57.41	72.54	67.50	66.23	61.19	69.39	64.35	60.56	55.52	81.37	76.33	75.70	70.66
78.08	73.04	59.37	54.33	78.08	73.04	59.37	54.33	70.34	65.30	58.85	58.85	74.21	69.17	67.76	62.72	70.98	65.94	61.95	56.91	83.25	78.21	77.44	72.40
79.88	74.84	60.73	55.69	79.88	74.84	60.73	55.69	71.96	66.92	60.32	60.32	75.92	70.88	69.32	64.28	72.62	67.58	63.38	58.34	85.16	80.12	79.22	74.18
81.72	76.68	62.13	57.09	81.72	76.68	62.13	57.09	73.61	68.57	61.82	61.82	77.67	72.63	70.91	65.87	74.29	69.25	64.83	59.79	87.12	82.08	81.04	76.00
83.60	78.56	63.56	58.52	83.60	78.56	63.56	58.52	75.31	70.27	63.36	63.36	79.45	74.41	72.54	67.50	76.00	70.96	66.33	61.29	89.13	84.09	82.91	77.87
85.52	80.48	65.03	59.99	85.52	80.48	65.03	59.99	77.04	72.00	64.93	64.93	81.28	76.24	74.21	69.17	77.75	72.71	67.85	62.81	91.18	86.14	84.82	79.78
87.49	82.45	66.52	61.48	87.49	82.45	66.52	61.48	78.82	73.78	66.54	66.54	83.15	78.11	75.92	70.88	79.54	74.50	69.42	64.38	93.28	88.24	86.77	81.73
89.51	84.47	68.05	63.01	89.51	84.47	68.05	63.01	80.63	75.59	68.19	68.19	85.07	80.03	77.67	72.63	83.24	78.20	72.65	67.61	95.42	90.38	88.77	83.73
91.57	86.53	69.62	64.58	91.57	86.53	69.62	64.58	82.49	77.45	69.88	69.88	87.03	81.99	79.45	74.42	83.24	78.20	72.65	67.61	97.62	92.58	90.81	85.77
93.68	88.64	71.23	66.19	93.68	88.64	71.23	66.19	84.39	79.35	76.64	76.64	89.03	83.99	81.29	76.26	85.16	80.12	74.32	69.28	99.87	94.83	92.90	87.86
95.83	90.79	72.87	67.83	95.83	90.79	72.87	67.83	86.33	81.29	78.41	78.41	91.08	86.04	83.16	78.12	87.12	82.08	76.03	70.99	102.17	97.13	95.04	90.00
98.04	93.00	74.54	69.60	98.04	93.00	74.54	69.60	88.32	83.28	80.22	80.22	93.18	88.14	85.08	80.04	89.13	84.09	77.79	72.75	104.52	99.48	97.23	92.19
100.30	95.26	76.26	71.22	100.30	95.26	76.26	71.22	90.35	85.31	82.06	82.06	95.33	90.29	87.04	82.00	91.18	86.14	79.58	74.54	106.93	101.89	99.47	94.43
102.61	97.57	78.02	72.98	102.61	97.57	78.02	72.98	92.43	87.39	83.95	83.95	97.52	92.48	89.04	84.00	93.28	88.24	81.41	76.37	108.40	103.36	101.76	96.72
104.98	99.94	79.82	74.78	104.98	99.94	79.82	74.78	94.56	89.52	85.89	85.89	99.77	94.73	91.09	86.05	95.43	90.39	83.29	78.25	111.92	106.88	104.11	99.07
107.39	102.35	81.65	76.61	107.39	102.35	81.65	76.61	96.74	91.70	87.87	87.87	102.07	97.03	93.19	88.15	97.63	92.59	85.21	80.17	114.49	109.45	106.51	101.47

**AVOIDED COST RATES FOR NON-FUELED PROJECTS
TEN AVERAGE MEGAWATTS OR SMALLER**

Monthly Weighting Factors		
JAN	HLH	LLH
	103%	94%
FEB	105%	97%
MAR	95%	80%
APR	95%	76%
MAY	92%	63%
JUN	94%	65%
JUL	121%	92%
AUG	121%	106%
SEP	109%	99%
OCT	115%	105%
NOV	110%	96%
DEC	129%	120%

Levelized Rate Structure Project On line in 2007

Contract Length	Levelized Cost (pUC 29646)	January			February			March			April			May			June		
		Heavy Load Hour Price 103%	Light Load Hour Price 94%	Less Wind Integration Cost Adjustment of:	Heavy Load Hour Price 105%	Light Load Hour Price 97%	Less Wind Integration Cost Adjustment of:	Heavy Load Hour Price 95%	Light Load Hour Price 80%	Less Wind Integration Cost Adjustment of:	Heavy Load Hour Price 92%	Light Load Hour Price 63%	Less Wind Integration Cost Adjustment of:	Heavy Load Hour Price 94%	Light Load Hour Price 65%	Less Wind Integration Cost Adjustment of:			
1	53.90	55.41	50.37	53.72	48.68	50.57	55.49	51.45	52.18	47.14	51.11	46.07	43.04	38.00	49.49	44.45	33.89	28.85	5.04
2	54.38	56.02	50.98	51.12	46.08	51.12	57.10	52.06	52.75	47.71	51.67	46.63	43.51	38.47	50.03	44.99	34.26	29.22	5.04
3	54.96	56.61	51.57	51.66	46.62	51.66	57.71	52.67	53.31	48.27	52.21	47.17	43.97	38.93	50.56	45.52	34.63	29.59	5.04
4	55.53	57.19	52.15	52.19	47.15	52.19	58.30	53.26	53.86	48.82	52.75	47.71	44.42	39.38	51.08	46.04	34.98	29.94	5.04
5	56.08	57.76	52.72	52.71	47.67	52.71	58.88	53.84	54.40	49.36	53.28	48.24	44.86	39.82	51.59	46.55	35.33	30.29	5.04
6	56.62	58.32	53.28	53.22	48.18	53.22	59.45	54.41	54.92	49.88	53.79	48.75	45.30	40.26	52.09	47.05	35.67	30.63	5.04
7	57.15	58.86	53.82	53.72	48.68	53.72	60.00	54.96	55.43	50.39	54.78	49.74	46.13	41.09	52.49	47.53	36.00	30.96	5.04
8	57.66	59.39	54.35	54.20	49.16	54.35	60.54	55.50	56.03	51.38	55.25	50.21	46.53	41.49	52.92	48.01	36.33	31.29	5.04
9	58.16	59.91	54.87	54.67	49.63	54.87	61.07	56.04	56.89	51.85	55.71	50.67	46.92	41.88	53.48	48.47	36.64	31.60	5.04
10	58.65	60.41	55.37	55.13	50.09	55.37	61.58	56.54	57.35	52.31	56.16	51.12	47.30	42.26	53.96	49.35	36.95	31.91	5.04
11	59.12	60.89	55.85	55.57	50.53	55.85	62.08	57.04	57.79	52.75	57.02	51.98	48.02	42.98	54.41	49.77	37.25	32.21	5.04
12	59.58	61.37	56.33	56.00	50.96	56.33	62.56	57.52	58.22	53.18	57.43	52.39	48.36	43.32	54.81	49.35	37.53	32.49	5.04
13	60.02	61.82	56.78	56.42	51.38	56.78	63.02	57.98	58.44	53.60	57.83	52.79	48.70	43.66	55.26	49.77	37.81	32.77	5.04
14	60.45	62.27	57.23	56.83	51.79	57.23	63.48	58.37	59.04	54.00	58.21	53.17	49.02	43.98	55.62	50.18	38.09	33.05	5.04
15	60.87	62.70	57.66	57.22	52.18	57.66	63.91	58.87	59.43	54.39	58.64	53.54	49.33	44.29	56.00	50.96	38.35	33.31	5.04
16	61.27	63.11	58.07	57.60	52.56	58.07	64.34	59.30	59.93	54.77	58.93	53.91	49.63	44.59	56.37	51.33	38.60	33.56	5.04
17	61.66	63.51	58.47	57.96	52.92	58.47	64.74	59.70	60.17	55.13	59.34	54.28	49.92	44.88	56.73	51.69	38.85	33.81	5.04
18	62.04	63.90	58.86	58.31	53.27	58.86	65.14	60.10	60.52	55.48	59.72	54.64	49.92	45.15	57.02	52.03	39.08	34.04	5.04
19	62.40	64.27	59.23	58.65	53.61	59.23	65.52	60.48	60.92	55.84	59.28	54.24	49.92	45.42					
20	62.74	64.63	59.59	58.98	53.94	59.59	65.88	60.84	60.86	55.82	59.61	54.57	50.19	45.15	57.72	52.68	39.53	34.49	5.04

July			August			September			October			November			December		
Heavy Load Hour Price			Light Load Hour Price			Heavy Load Hour Price			Light Load Hour Price			Heavy Load Hour Price			Light Load Hour Price		
Price	121%	Less Wind Integration Cost Adjustment of:	Price	121%	Less Wind Integration Cost Adjustment of:	Price	109%	Less Wind Integration Cost Adjustment of:	Price	115%	Less Wind Integration Cost Adjustment of:	Price	110%	Less Wind Integration Cost Adjustment of:	Price	125%	Less Wind Integration Cost Adjustment of:
65.09	60.05	49.49	44.45	57.02	51.98	58.64	53.60	53.26	48.22	61.87	56.83	56.49	51.45	51.64	46.60	64.56	59.52
65.81	60.77	50.03	44.99	57.65	52.61	59.28	54.24	53.84	48.80	62.54	57.50	57.10	52.06	52.21	47.17	65.26	60.22
66.50	61.46	50.56	45.52	58.26	53.22	59.91	54.87	54.41	49.37	63.21	58.17	57.71	52.67	52.76	47.72	65.95	60.91
67.19	62.15	51.08	46.04	58.86	53.82	60.52	55.48	54.97	49.93	63.86	58.82	58.30	53.26	53.31	48.27	66.65	61.59
67.86	62.82	51.59	46.55	59.44	54.40	61.13	56.09	55.52	50.48	64.49	59.65	59.88	53.84	53.84	48.80	67.29	62.28
68.51	63.47	52.09	47.05	60.02	54.98	61.71	56.67	56.05	51.01	65.11	60.07	59.45	54.41	54.35	49.31	67.94	62.90
69.15	64.11	52.57	47.53	60.57	55.53	62.29	57.25	56.57	51.53	65.72	60.68	60.00	54.96	54.86	49.82	68.58	63.54
69.77	64.73	53.05	48.01	61.12	56.08	62.85	57.81	57.08	52.04	66.31	61.27	60.54	55.50	55.35	50.31	69.19	64.15
70.37	65.33	53.51	48.47	61.65	56.61	63.39	58.35	57.58	52.52	66.88	61.84	61.07	56.03	55.83	50.79	69.79	64.75
70.96	65.92	53.96	48.92	62.17	57.13	63.93	58.89	58.06	53.02	67.44	62.40	61.58	56.54	56.30	51.26	70.38	65.34
71.53	66.49	54.39	49.35	62.67	57.63	64.44	59.40	58.53	53.49	68.02	62.96	62.08	57.04	56.75	51.71	70.94	65.90
72.09	67.05	54.81	49.77	63.15	58.11	64.94	59.90	59.08	53.94	68.52	63.48	62.56	57.52	57.02	52.16	71.49	66.45
72.63	67.59	55.22	50.18	63.62	58.58	65.43	60.39	59.63	54.38	69.03	63.99	63.02	57.98	57.62	52.68	72.03	66.99
73.15	68.11	55.62	50.58	64.08	59.04	65.89	60.85	59.85	54.81	69.52	64.48	63.48	58.44	58.04	53.00	72.54	67.50
73.65	68.61	56.00	50.96	64.52	59.48	66.35	61.31	60.26	55.22	70.00	64.96	63.91	58.87	58.44	53.40	73.04	68.00
74.14	69.10	56.37	51.33	64.95	59.91	66.79	61.75	60.66	55.62	70.46	65.42	64.34	59.30	58.82	53.78	73.53	68.49
74.61	69.57	56.73	51.89	65.36	60.32	67.21	62.17	61.04	56.00	70.91	65.87	64.74	59.70	59.19	54.15	73.99	68.95
75.06	70.02	57.07	52.03	65.76	60.72	67.62	62.58	61.41	56.37	71.34	66.30	65.14	59.95	59.55	54.51	74.44	69.40
75.50	70.46	57.40	52.36	66.14	61.10	68.01	62.97	61.77	56.73	71.76	66.72	65.52	60.48	60.03	54.86	74.88	69.84
75.92	70.88	57.72	52.68	66.51	61.47	68.39	63.35	62.12	57.08	72.15	67.11	65.86	60.84	60.23	55.19	75.29	70.25

Levelized Rate Structure
Project On line in 2008

Contract Length	Flat Price (PUC 29646)	January				February				March				April				May				June			
		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price		Heavy Load Hour Price		Light Load Hour Price	
		Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04
1	55.03	55.68	51.84	51.73	46.69	57.79	52.76	53.38	48.34	52.28	47.24	44.03	38.99	52.28	47.24	41.83	36.79	50.63	45.59	34.67	29.63	51.73	46.69	35.77	30.73
2	55.64	57.30	52.26	52.30	47.26	58.42	53.38	53.97	48.93	52.85	47.81	44.51	39.47	52.85	47.81	42.28	37.24	51.18	46.14	35.05	30.01	52.30	47.26	36.16	31.12
3	56.23	57.91	52.87	52.85	47.81	59.04	54.00	54.54	49.50	53.41	48.37	44.98	39.94	53.41	48.37	42.73	37.69	51.73	46.69	35.42	30.38	52.85	47.81	36.55	31.51
4	56.80	58.51	53.47	53.40	48.36	59.64	54.60	55.10	50.06	53.96	48.92	45.44	40.40	53.96	48.92	43.17	38.13	52.26	47.22	35.79	30.75	53.40	48.36	36.92	31.88
5	57.37	59.09	54.06	53.93	48.89	60.24	55.20	55.65	50.61	54.50	49.46	45.90	40.86	54.50	49.46	43.60	38.66	52.78	47.74	36.14	31.10	53.93	48.89	37.29	32.25
6	57.92	59.66	54.62	54.45	49.41	60.82	55.78	56.18	51.14	55.03	49.99	46.34	41.30	55.03	49.99	44.02	38.98	53.29	48.25	36.49	31.45	54.45	49.41	37.65	32.61
7	58.46	60.21	55.17	54.95	49.91	61.38	56.34	56.71	51.67	55.54	50.50	46.77	41.73	55.54	50.50	44.43	39.39	53.78	48.74	36.83	31.79	54.95	49.91	38.00	32.96
8	58.99	60.76	55.72	55.45	50.41	61.94	56.90	57.22	52.18	56.04	51.00	47.19	42.15	56.04	51.00	44.83	39.79	54.27	49.23	37.16	32.12	55.45	50.41	38.34	33.30
9	59.50	61.28	56.24	55.93	50.89	62.47	57.43	57.71	52.67	56.52	51.48	47.60	42.68	56.52	51.48	45.22	40.18	54.74	49.70	37.48	32.44	55.93	50.89	38.67	33.63
10	60.00	61.80	56.76	56.40	51.36	63.00	57.96	58.20	53.16	57.00	51.96	48.00	43.34	57.00	51.96	45.60	40.56	55.20	50.16	37.80	32.76	56.40	51.36	39.00	33.96
11	60.48	62.29	57.25	56.85	51.81	63.50	58.46	58.67	53.63	57.46	52.42	48.38	43.84	57.46	52.42	45.96	40.92	55.64	50.60	38.10	33.06	56.85	51.81	39.31	34.27
12	60.95	62.78	57.74	57.29	52.25	64.00	58.96	59.12	54.08	58.33	53.29	48.12	44.08	58.33	53.29	46.67	41.63	56.07	51.03	38.40	33.36	57.29	52.25	39.62	34.58
13	61.40	63.25	58.21	57.72	52.68	64.47	59.43	59.56	54.52	58.75	53.71	48.48	44.44	58.75	53.71	47.00	41.96	56.49	51.46	38.68	33.64	57.72	52.68	39.91	34.87
14	61.84	63.70	58.66	58.13	53.08	64.94	59.90	59.99	54.95	59.15	54.12	49.82	44.78	59.15	54.12	47.33	42.29	56.90	51.86	38.96	33.92	58.13	53.08	40.20	35.16
15	62.27	64.14	59.10	58.53	53.49	65.38	60.34	60.40	55.36	59.55	54.51	50.15	45.11	59.55	54.51	47.64	42.60	57.29	52.25	39.23	34.19	58.53	53.49	40.48	35.44
16	62.68	64.56	59.52	58.92	53.88	65.82	60.78	60.80	55.76	59.93	54.89	50.46	45.42	59.93	54.89	47.94	42.90	57.67	52.63	39.49	34.45	58.92	53.88	40.74	35.70
17	63.08	64.97	59.93	59.29	54.25	66.24	61.19	61.19	56.15	60.29	55.25	50.77	45.73	60.29	55.25	48.23	43.19	58.03	52.99	39.74	34.70	59.29	54.25	41.00	35.96
18	63.46	65.37	60.33	59.65	54.61	66.64	61.60	61.56	56.52	60.64	55.60	51.07	46.03	60.64	55.60	48.51	43.47	58.39	53.35	39.98	34.94	59.65	54.61	41.25	36.21
19	63.83	65.75	60.71	60.00	54.96	67.02	61.98	61.92	56.88	60.98	55.94	51.35	46.31	60.98	55.94	48.78	43.74	58.73	53.69	40.21	35.17	60.00	54.96	41.49	36.45
20	64.19	66.11	61.07	60.34	55.30	67.40	62.36	62.26	57.22	60.98	55.94	51.35	46.31	60.98	55.94	48.78	43.74	59.05	54.01	40.44	35.40	60.34	55.30	41.72	36.68

July			August			September			October			November			December		
Heavy Load Hour Price 121%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 92%	Heavy Load Hour Price 121%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 106%	Heavy Load Hour Price 105%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 99%	Heavy Load Hour Price 115%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 105%	Heavy Load Hour Price 110%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 96%	Heavy Load Hour Price 125%	Less Wind Integration Cost Adjustment of:	
Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04	Price	5.04
66.59	61.55	50.63	45.59	66.59	61.55	58.34	53.30	59.95	54.95	63.29	58.25	57.79	52.75	60.54	55.50	60.54	55.50
67.32	62.28	51.16	46.14	67.32	62.28	58.97	53.93	60.64	55.60	63.98	58.94	58.42	53.38	61.20	56.16	61.20	56.16
68.03	62.99	51.73	46.69	68.03	62.99	59.60	54.56	61.29	56.25	64.65	59.62	59.04	54.00	61.85	56.81	61.85	56.81
68.73	63.69	52.26	47.22	68.73	63.69	60.21	55.17	61.92	56.88	65.32	60.28	59.64	54.60	62.48	57.44	62.48	57.44
69.42	64.38	52.78	47.74	69.42	64.38	60.81	55.77	62.53	57.49	65.97	60.93	60.24	55.20	63.11	58.07	63.11	58.07
70.08	65.04	53.29	48.25	70.08	65.04	61.40	56.38	63.13	58.09	66.61	61.57	60.82	55.78	63.71	58.67	63.71	58.67
70.74	65.70	53.78	48.74	70.74	65.70	61.97	56.93	63.72	58.68	67.23	62.19	61.38	56.34	64.31	59.27	64.31	59.27
71.37	66.33	54.27	49.23	71.37	66.33	62.53	57.49	64.30	59.26	67.83	62.79	61.94	56.90	64.88	59.84	64.88	59.84
71.99	66.95	54.74	49.70	71.99	66.95	63.07	58.03	64.85	59.81	68.42	63.38	62.47	57.43	65.45	60.41	65.45	60.41
72.60	67.56	55.20	50.16	72.60	67.56	63.60	58.56	65.40	60.36	69.00	63.96	63.00	57.96	66.00	60.96	66.00	60.96
73.18	68.14	55.64	50.60	73.18	68.14	64.11	59.07	65.92	60.88	69.55	64.51	63.50	58.46	66.53	61.49	66.53	61.49
73.75	68.71	56.07	51.03	73.75	68.71	64.61	59.57	66.43	61.39	70.09	65.05	64.47	59.43	67.04	62.00	67.04	62.00
74.30	69.26	56.49	51.46	74.30	69.26	65.09	60.05	66.93	61.89	70.61	65.57	64.94	59.90	67.54	62.50	67.54	62.50
74.83	69.79	56.90	51.88	74.83	69.79	65.56	60.52	67.41	62.37	71.12	66.08	64.94	59.90	68.03	62.99	68.03	62.99
75.35	70.31	57.29	52.25	75.35	70.31	66.01	60.97	67.87	62.83	71.61	66.57	65.38	60.34	68.55	63.46	68.55	63.46
75.85	70.81	57.67	52.63	75.85	70.81	66.44	61.40	68.32	63.28	72.08	67.04	65.82	60.78	68.95	63.91	68.95	63.91
76.33	71.29	58.03	52.99	76.33	71.29	66.86	61.82	68.76	63.72	72.54	67.50	66.23	61.19	69.39	64.35	69.39	64.35
76.79	71.75	58.39	53.35	76.79	71.75	67.27	62.23	69.17	64.13	72.98	67.96	66.64	61.60	69.81	64.77	69.81	64.77
77.24	72.20	58.73	53.69	77.24	72.20	67.66	62.62	69.58	64.54	73.41	68.37	67.02	61.98	70.21	65.17	70.21	65.17
77.67	72.63	59.05	54.01	77.67	72.63	68.04	63.00	69.95	64.92	73.81	68.77	67.40	62.36	70.61	65.57	70.61	65.57

Contract Length	Flat Price (IPUC 29848)	January			February			March			April			May			June		
		Heavy Load Hour Price 103%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 94%	Heavy Load Hour Price 105%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 97%	Heavy Load Hour Price 95%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 80%	Heavy Load Hour Price 95%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 76%	Heavy Load Hour Price 92%	Less Wind Integration Cost Adjustment of:	Light Load Hour Price 63%	Heavy Load Hour Price 94%	Less Wind Integration Cost Adjustment of:	
1	56.30	57.99	52.95	52.92	59.11	54.07	49.57	53.48	48.44	45.04	53.48	48.44	42.79	51.80	46.76	35.47	52.92	47.88	36.59
2	56.91	58.62	53.58	48.46	59.76	54.72	50.17	54.07	49.03	45.53	54.07	49.03	38.22	52.36	47.32	35.86	53.50	48.46	36.99
3	57.52	59.24	54.20	49.03	60.39	55.35	55.79	54.64	49.60	46.01	54.64	49.60	43.71	52.92	47.88	36.24	54.07	49.03	37.39
4	58.11	59.85	54.81	49.58	61.02	55.98	56.37	55.20	50.15	46.49	55.20	50.15	44.16	53.46	48.42	36.61	54.62	49.58	37.77
5	58.69	60.45	55.41	50.13	61.62	56.58	56.93	55.75	50.71	46.95	55.75	50.71	44.60	53.99	48.95	36.97	55.17	50.13	38.15
6	59.25	61.03	55.99	50.66	62.22	57.18	57.48	56.29	51.25	47.40	56.29	51.25	45.03	54.51	49.47	37.33	55.70	50.66	38.51
7	59.81	61.60	56.56	51.18	62.80	57.76	58.01	56.82	51.78	47.84	56.82	51.78	45.45	55.02	49.98	37.68	56.22	51.18	38.87
8	60.34	62.15	57.11	51.68	63.36	58.32	58.53	57.33	52.29	48.27	57.33	52.29	45.86	55.52	50.96	38.05	56.72	51.68	39.22
9	60.87	62.69	57.65	52.17	63.91	58.87	59.04	58.31	52.78	48.69	58.31	52.78	46.26	56.00	50.96	38.35	57.21	52.17	39.56
10	61.38	63.22	58.18	52.65	64.45	59.41	59.53	58.78	53.27	49.10	58.78	53.27	46.65	56.92	51.43	38.67	57.69	52.65	39.89
11	61.87	63.73	58.69	53.12	64.96	59.92	60.01	59.23	53.74	49.50	59.23	53.74	47.02	56.92	51.88	38.98	58.16	53.12	40.22
12	62.35	64.22	59.18	53.57	65.47	60.43	60.48	59.68	54.19	49.88	59.68	54.19	47.39	57.36	52.32	39.28	58.61	53.57	40.53
13	62.82	64.70	59.66	54.01	65.96	60.92	60.93	59.88	54.64	50.25	59.88	54.64	47.74	57.79	52.75	39.57	59.05	54.01	40.83
14	63.27	65.17	60.13	54.47	66.43	61.39	61.37	60.10	55.06	50.61	60.10	55.06	48.08	58.21	53.17	39.86	59.47	54.43	41.12
15	63.70	65.61	60.57	54.84	66.89	61.85	61.79	60.52	55.48	50.96	60.52	55.48	48.41	58.61	53.57	39.86	59.88	54.84	41.41
16	64.12	66.05	61.01	55.24	67.33	62.29	62.20	60.92	55.88	51.30	60.92	55.88	48.73	58.99	53.95	40.13	60.28	55.24	41.68
17	64.53	66.47	61.43	55.62	67.76	62.72	62.60	61.30	56.26	51.62	61.30	56.26	49.04	59.37	54.33	40.65	60.66	55.62	41.95
18	64.92	66.87	61.83	55.99	68.17	63.13	62.98	61.68	56.64	51.94	61.68	56.64	49.34	59.73	54.69	40.90	61.03	55.99	42.20
19	65.30	67.26	62.22	56.34	68.57	63.53	63.34	62.04	57.00	52.24	62.04	57.00							

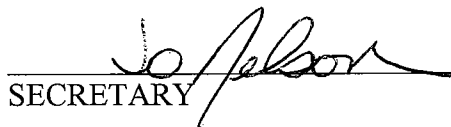
CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 27TH DAY OF JULY 2007,
SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN
CASE NO. PAC-E-07-13, BY MAILING A COPY THEREOF, POSTAGE PREPAID,
TO THE FOLLOWING:

DEAN BROCKBANK
SENIOR COUNSEL
ROCKY MOUNTAIN POWER
201 S MAIN ST STE 2300
SALT LAKE CITY UT 84111
E-MAIL: dean.brockbank@pacificorp.com

BRIAN DICKMAN
MANAGER, ID REGULATORY AFFAIRS
ROCKY MOUNTAIN POWER
201 S MAIN ST STE 2300
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DATA REQUEST RESPONSE CENTER
PACIFICORP
825 NE MULTNOMAH STE 2000
PORTLAND OR 97232
E-MAIL: datarequest@pacificorp.com



SECRETARY

CERTIFICATE OF SERVICE