

2010 BPA Rate Case
Wholesale Power Rate Initial Proposal

**LOOKBACK RECOVERY
AND RETURN
STUDY**

February 2009

WP-10-E-BPA-09



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LOOKBACK RECOVERY AND RETURN STUDY

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COMMONLY USED ACRONYMS

AC	alternating current
AFUDC	Allowance for Funds Used During Construction
AGC	Automatic Generation Control
ALF	Agency Load Forecast (computer model)
aMW	average megawatt
AMNR	Accumulated Modified Net Revenues
ANR	Accumulated Net Revenues
AOP	Assured Operating Plan
ASC	Average System Cost
ATC	Accrual to Cash
BAA	Balancing Authority Area
BASC	BPA Average System Cost
Bcf	billion cubic feet
BiOp	Biological Opinion
BPA	Bonneville Power Administration
Btu	British thermal unit
CAISO	California Independent System Operator
CBFWA	Columbia Basin Fish & Wildlife Authority
CCCT	combined-cycle combustion turbine
cfs	cubic feet per second
CGS	Columbia Generating Station
CHJ	Chief Joseph
C/M	consumers per mile of line for LDD
COB	California-Oregon Border
COE	U.S. Army Corps of Engineers
COI	California-Oregon Intertie
COSA	Cost of Service Analysis
COU	consumer-owned utility
Council	Northwest Power and Conservation Council
CP	Coincidental Peak
CRAC	Cost Recovery Adjustment Clause
CRC	Conservation Rate Credit
CRFM	Columbia River Fish Mitigation
CRITFC	Columbia River Inter-Tribal Fish Commission
CSP	Customer System Peak
CT	combustion turbine
CY	calendar year (January through December)
DC	direct current
DDC	Dividend Distribution Clause
dec	decremental
DJ	Dow Jones
DO	Debt Optimization
DOE	Department of Energy
DOP	Debt Optimization Program

DSI	direct-service industrial customer or direct-service industry
EAF	energy allocation factor
ECC	Energy Content Curve
EIA	Energy Information Administration
EIS	Environmental Impact Statement
EN	Energy Northwest, Inc. (formerly Washington Public Power Supply System)
EPA	Environmental Protection Agency
EPP	Environmentally Preferred Power
EQR	Electric Quarterly Report
ESA	Endangered Species Act
F&O	financial and operating reports
FBS	Federal Base System
FCRPS	Federal Columbia River Power System
FCRTS	Federal Columbia River Transmission System
FERC	Federal Energy Regulatory Commission
FELCC	firm energy load carrying capability
FPA	Federal Power Act
FPS	Firm Power Products and Services (rate)
FY	fiscal year (October through September)
GAAP	Generally Accepted Accounting Principles
GARD	Generation and Reserves Dispatch (computer model)
GCL	Grand Coulee
GCPs	General Contract Provisions
GEP	Green Energy Premium
GI	Generation Integration
GRI	Gas Research Institute
GRSPs	General Rate Schedule Provisions
GSP	Generation System Peak
GSU	generator step-up transformers
GTA	General Transfer Agreement
GWh	gigawatthour
HLH	heavy load hour
HOSS	Hourly Operating and Scheduling Simulator (computer model)
HYDSIM	Hydro Simulation (computer model)
IDC	interest during construction
inc	incremental
IOU	investor-owned utility
IP	Industrial Firm Power (rate)
IPR	Integrated Program Review
IRP	Integrated Resource Plan
ISD	incremental standard deviation
ISO	Independent System Operator
JDA	John Day
kaf	thousand (kilo) acre-feet
kcfs	thousand (kilo) cubic feet per second

K/I	kilowatthour per investment ratio for LDD
ksfd	thousand (kilo) second foot day
kV	kilovolt (1000 volts)
kVA	kilo volt-ampere (1000 volt-amperes)
kW	kilowatt (1000 watts)
kWh	kilowatthour
LDL	Low Density Discount
LGIP	Large Generator Interconnection Procedures
LLH	light load hour
LME	London Metal Exchange
LOLP	loss of load probability
LRA	Load Reduction Agreement
m/kWh	mills per kilowatthour
MAE	mean absolute error
Maf	million acre-feet
MCA	Marginal Cost Analysis
MCN	McNary
Mid-C	Mid-Columbia
MIP	Minimum Irrigation Pool
MMBtu	million British thermal units
MNR	Modified Net Revenues
MOA	Memorandum of Agreement
MOP	Minimum Operating Pool
MORC	Minimum Operating Reliability Criteria
MOU	Memorandum of Understanding
MRNR	Minimum Required Net Revenue
MVAr	megavolt ampere reactive
MW	megawatt (1 million watts)
MWh	megawatthour
NCD	non-coincidental demand
NEPA	National Environmental Policy Act
NERC	North American Electric Reliability Corporation
NFB	National Marine Fisheries Service (NMFS) Federal Columbia River Power System (FCRPS) Biological Opinion (BiOp)
NIFC	Northwest Infrastructure Financing Corporation
NLSL	New Large Single Load
NOAA Fisheries	National Oceanographic and Atmospheric Administration Fisheries (formerly National Marine Fisheries Service)
NOB	Nevada-Oregon Border
NORM	Non-Operating Risk Model (computer model)
Northwest Power Act	Pacific Northwest Electric Power Planning and Conservation Act
NPCC	Northwest Power and Conservation Council
NPV	net present value
NR	New Resource Firm Power (rate)
NT	Network Transmission

NTSA	Non-Treaty Storage Agreement
NUG	non-utility generation
NWPP	Northwest Power Pool
OATT	Open Access Transmission Tariff
O&M	operation and maintenance
OMB	Office of Management and Budget
OTC	Operating Transfer Capability
OY	operating year (August through July)
PDP	proportional draft points
PF	Priority Firm Power (rate)
PI	Plant Information
PMA	(Federal) Power Marketing Agency
PNCA	Pacific Northwest Coordination Agreement
PNRR	Planned Net Revenues for Risk
PNW	Pacific Northwest
POD	Point of Delivery
POI	Point of Integration or Point of Interconnection
POM	Point of Metering
POR	Point of Receipt
Project Act	Bonneville Project Act
PS	BPA Power Services
PSC	power sales contract
PSW	Pacific Southwest
PTP	Point to Point Transmission (rate)
PUD	public or people's utility district
RAM	Rate Analysis Model (computer model)
RAS	Remedial Action Scheme
Reclamation	U.S. Bureau of Reclamation
RD	Regional Dialogue
REC	Renewable Energy Certificate
REP	Residential Exchange Program
RevSim	Revenue Simulation Model (component of RiskMod)
RFA	Revenue Forecast Application (database)
RFP	Request for Proposal
RiskMod	Risk Analysis Model (computer model)
RiskSim	Risk Simulation Model (component of RiskMod)
RMS	Remote Metering System
RMSE	root-mean squared error
ROD	Record of Decision
RPSA	Residential Purchase and Sale Agreement
RTF	Regional Technical Forum
RTO	Regional Transmission Operator
SCADA	Supervisory Control and Data Acquisition
SCCT	single-cycle combustion turbine
Slice	Slice of the System (product)
SME	subject matter expert

TAC	Targeted Adjustment Charge
TDA	The Dalles
Tcf	trillion cubic feet
TPP	Treasury Payment Probability
Transmission System Act	Federal Columbia River Transmission System Act
TRL	Total Retail Load
TRM	Tiered Rate Methodology
TS	BPA Transmission Services
UAI	Unauthorized Increase
UDC	utility distribution company
URC	Upper Rule Curve
USFWS	U.S. Fish and Wildlife Service
VOR	Value of Reserves
WECC	Western Electricity Coordinating Council (formerly WSCC)
WIT	Wind Integration Team
WPRDS	Wholesale Power Rate Development Study
WREGIS	Western Renewable Energy Generation Information System
WSPP	Western Systems Power Pool

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1 **1. INTRODUCTION**

2 **1.1 Background and Purpose of the Study**

3 On May 3, 2007, the Ninth Circuit Court of Appeals (Court) held that the 2000 Residential
4 Exchange Program Settlement Agreements (REP Settlement Agreements) executed by BPA and
5 its investor-owned utility customers (IOUs) were inconsistent with the Northwest Power Act.

6 *Portland General Elec. Co. v. Bonneville Power Admin.*, 501 F.3d 1009 (9th Cir. 2007) (PGE).

7 In a companion case, the Court also remanded the WP-02 power rates to BPA on the grounds
8 that BPA improperly allocated the costs of the REP Settlement Agreements, as amended, to
9 BPA's preference customers. *Golden NW Aluminum, Inc. v. Bonneville Power Admin.*, 501 F.3d
10 1037 (9th Cir. 2007) (Golden NW). Although the Court's decision in *Golden NW* addressed only
11 the WP-02 rates, the WP-07 wholesale power rates were similarly flawed because they contained
12 the same treatment of the REP Settlement Agreements as the WP-02 rates.

13
14 In February 2008, BPA commenced the WP-07 Supplemental Wholesale Power Rate Proceeding
15 to respond to the Court's decisions. In that proceeding, BPA revisited its WP-02 and WP-07 rate
16 case assumptions through a comprehensive "Lookback" construct. As explained fully in the
17 2007 Supplemental Wholesale Power Rate Case Administrator's Final Record of Decision (WP-
18 07 Supplemental ROD), WP-07-A-05, particularly chapters 8 and 9, the Lookback construct
19 compared amounts paid under the REP Settlement Agreements for FY 2002-2008 with the
20 amounts BPA would likely have paid under the traditional operation of the REP. The difference
21 between these two amounts, subject to certain specified rules, is the amount BPA must recover
22 from the IOUs and return to the consumer-owned utilities (COUs). Consumer-owned utilities
23 are defined as the public bodies, cooperatives, and federal agencies that are eligible to purchase
24 power from BPA at the Priority Firm rate. The total amount to be recovered from the IOUs and
25 returned to the COUs over time is referred to generally as the "Lookback Amount." Each IOU

1 has a Lookback Amount. The Lookback Amounts are recovered from the IOUs over time
2 through reductions in IOU REP benefits and returned to the eligible COUs as credits on their
3 power bills. *See* WP-07 Supplemental ROD, WP-07-A-05, chapters 8 and 9.

4

5 The purpose of this Study is to present the calculations and determinations of the Lookback
6 Amounts to be recovered from the IOUs and returned to the eligible COUs in FY 2010 and FY
7 2011. In addition, BPA proposes to make certain minor corrections to errors discovered in the
8 PF-02 revenue data used to determine the non-Slice PF-02 revenue shares used in the final FY
9 2002-2008 Lookback Study. FY 2002-2008 Lookback Study, WP-07-FS-BPA-08, Table 15.10.
10 These errors were discovered subsequent to the publication of the WP-07 Supplemental Final
11 Proposal. These errors change the utility-specific percentages used to allocate the annual
12 Lookback Amount to each eligible public utility.

13

1 **2. LOOKBACK AMOUNTS, RECOVERY AND RETURN FOR FY 2010-2011**

2 **2.1 Lookback Recovery and Return for FY 2010-2011**

3 BPA proposes to continue the approach developed in the WP-07 Supplemental proceeding for
4 recovering and returning Lookback Amounts to qualifying PF preference customers. This Study
5 explains how BPA intends to implement that approach for the FY 2010-2011 rate period. In
6 general, payments of Lookback Amounts would be made by reducing the REP benefits due the
7 IOUs. The amount of such reduction would be consistent with the principles outlined in the WP-
8 07 Supplemental ROD and as explained in the testimony of Evans et al., WP-10-E-BPA-19.
9 These principles include the dual goals of returning the Lookback Amounts to the within seven
10 years, while also providing at least 50 percent of an IOU's REP benefits. The reduction of IOU
11 REP benefits will be returned to the eligible COUs as credits on power bills in equal amounts
12 over the rate period.

13
14 **2.2 Changes to the FY 2009 REP Benefits Applied to Lookback Amounts**
15 The current estimate of the FY 2009 REP benefits applied to individual IOU Lookback Amounts
16 differs slightly from the amounts presented in the FY 2002-2008 Lookback Study. *See* Table 1
17 below. The changes resulted from the following events.

18
19 On or about October 1, 2008, the region's IOUs filed updated exchange load forecasts and their
20 initial FY 2009 ASCs, referred to as "as-filed" ASCs. These ASCs are currently being reviewed
21 in a separate administrative process. Wholesale Power Rate Development Study (WPRDS), WP-
22 10-E-BPA-05, section 6.2. The as-filed ASCs differed from the forecast ASCs used in the WP-
23 07 Supplemental Final Proposal. As a result, BPA implemented the Supplemental 7(b)(3) Rate
24 Charge Adjustment, which changed the utility-specific PF Exchange rates and the resulting REP
25 benefits, pursuant to the 2007 Supplemental General Rate Schedule Provisions (WP-07 GRSPs).

1 WP-07 GRSPs, WP-07-A-05A, at 111-112. While the total amount of REP benefits (before
2 deemer and Lookback adjustments) did not change, the distribution of those benefits among the
3 exchanging IOUs did. As a result of these re-calculations, Puget Sound Energy's (Puget)
4 expected REP benefits for FY 2009 increased markedly due to its higher ASC, while the REP
5 benefits due the other IOUs (particularly Avista, PacifiCorp, and NorthWestern Energy)
6 declined. These reductions in REP benefits for Avista and PacifiCorp caused their expected REP
7 payments to fall below the 50 percent threshold established in the WP-07 Supplemental Final
8 Proposal.

9

10 In response and by verbal agreement with the affected IOUs, BPA decreased the amount of
11 amortization of Lookback Amounts for PacifiCorp and Avista for FY 2009 to restore their
12 benefit levels to the 50 percent level. In addition, BPA increased the amortization of Puget's
13 Lookback Amount payment for FY 2009 so that the total amortization of Lookback Amounts
14 remained at \$70.77 million as stated in the WP-07 Supplemental Final Proposal filed with the
15 Federal Energy Regulatory Commission on September 29, 2008. These changes were based on
16 the as-filed ASCs and the forecast exchange loads from the WP-07 Supplemental Final Proposal.
17 They did not use the updated exchange load forecasts that the IOUs provided on or about
18 October 1, 2009.

19

20 The REP benefits paid to the IOUs will change throughout the year due to differences between
21 actual and forecast exchange loads. In addition, the total amount of REP benefits due the IOUs
22 for FY 2009 will not be finally established until the IOUs' ASCs have been determined in the
23 ASC Review Process. This movement in REP benefits between rate case estimates and actual
24 payments is occurring during FY 2009 because it is a transition year in the implementation of the
25 2008 ASC Methodology. *See* WPRDS, WP-10-E-BPA-05, section 6.3.

1
2 **Table 1**
3 **Lookback Amounts Recovered in FY 2009**
4 (\$ in millions)

	A FY 2009 REP Benefits Applied to Lookback 1/	B Revised FY 2009 REP Benefits Applied to Lookback 2/
8	Avista	\$ 2.57
9	Idaho Power	\$ 0
10	Northwestern	\$ 0
11	PaciCorp	\$ 26.25
12	PGE	\$ 16.81
13	Puget	\$ 25.14
14	Total	\$70.77

15
16 1/ These amounts were the original amounts published in the FY 2002-2008 Lookback Study
17 (WP-07-FS-BPA-08, at 274).

18 2/ These amounts reflect the changes discussed in this section 2.2.

20 **2.3 Lookback Amount Balances at the End of FY 2009**

21 The remaining balance of each IOU's Lookback Amount as of the end of FY 2009 is the
22 difference between the original balance at the beginning of FY 2009 and the amount of REP
23 benefits applied each month, plus accrued interest, over the 12 months of the fiscal year. Interest
24 on the outstanding Lookback balances has been accruing since October 1, 2008. The balance as
25 of the end of FY 2009 reflects the accrual of interest over the year at the rates as determined in
26 the WP-07 Supplemental ROD. *See also* FY 2002-2008 Lookback Study, WP-07-FS-BPA-08,
27 Table 15.7. In the FY 2002-2008 Lookback Study, BPA noted that the rate of interest would be
28 determined for each rate period. *Id.* at 274. *See* section 2.5 of this Study for a discussion of the
29 interest rate proposed to be applied to Lookback balances for FY 2010-2011.

30
31 Table 2 shows the current estimates of the Lookback Amount balances for each IOU used in the
32 WP-10 Initial Proposal. The Lookback Amount balance for Avista will change in the event that
33 BPA signs a settlement with Avista for its outstanding deemer balance.

1
 2 **Table 2**
 3 **Lookback Amount Balances as of the End of FY 2009**
 4 (\$ in millions)

	A Current Estimate	B WP-07 Supplemental Final Proposal 1/
8	Avista	\$ 77.576
9	Idaho Power	\$ 107.561
10	Northwestern	\$ 0
11	PacifiCorp	\$ 233.953
12	PGE	\$ 90.484
13	Puget	\$ 131.935
14	Total	\$ 641.508

15
 16 1/ These amounts reflect the errata filed in February 2009 that corrected an error in Avista's
 17 average system cost (ASC) for 2008. FY 2002-2008 Lookback Study, WP-07-FS-BPA-08,
 18 Table 15.6.

19
 20 **2.4 REP Benefits Due, Recovered Lookback Amounts, REP Benefits Paid for FY 2010
21 and FY 2011 and End-of FY 2011 Lookback Balances**

22 In the WP-07 Supplemental ROD, BPA decided to reduce future REP benefits as the means to
 23 repaying the FY 2002-2006 Lookback Amount, with the objective of recovering and returning
 24 the Lookback Amount to the eligible COUs within seven years (by the end of FY 2015), where
 25 reasonable. WP-07 Supplemental ROD, WP-07-A-BPA-05, section 9.3.2. BPA also stated that
 26 for FY 2009, this objective was subject to the limitation that an IOU's REP benefits should not
 27 fall below 50 percent of the REP benefits otherwise due. *Id.*

28
 29 For FY 2010 and FY 2011, BPA proposes to continue the goal of repaying each IOU's Lookback
 30 Amount in seven years, where reasonable, while also ensuring that the residential and small farm
 31 consumers of the IOUs receive no less than 50 percent of their REP benefits. Under this
 32 approach, Puget and PGE are forecast to pay off their respective Lookback Amounts by FY
 33 2015. Avista and PacifiCorp are forecast to have less REP benefits (before any adjustments) in

1 FY 2010 and FY 2011 than in FY 2009. If these utilities' Lookback Amounts are amortized over
2 seven years, their residential and small farm consumers would receive less than 50 percent of
3 their REP benefits. As stated in the testimony of Evans et al., WP-10-E-BPA-19, the 50 percent
4 threshold determined in the WP-07 Supplemental ROD is proposed to be continued in the WP-10
5 Initial Proposal.

6

7 Table 3 summarizes the forecasts of REP benefits due, Lookback Amounts recovered, and REP
8 benefits paid to the IOUs for FY 2010-2011. The forecasts provided in Table 3 are based on the
9 IOUs' "as-filed" ASCs, which are subject to change. As discussed in the WPRDS, section 6.4,
10 the IOUs' "as-filed" ASCs are being evaluated in BPA's ASC Review Process for FY 2010-
11 2011.

12

13 **Table 3**
14 **REP Benefits, Lookback Amounts to be Recovered,**
15 **and REP Benefits Paid**
16 **(**\$ in million**)**

	A	B	C	D	E	F	G	
	REP Benefits Due		Lookback Amount		REP Benefits Paid		Average Benefits Paid - %	
	FY 2010	FY 2011	FY 2010	FY 2011	FY 2010	FY 2011		
21	Avista	\$14.95	\$16.54	\$ 7.47	\$ 8.27	\$7.47	\$8.27	50%
22	Idaho Power	\$0	\$0	\$ 0	\$ 0	\$0	\$0	0%
23	Northwestern	\$3.89	\$3.64	n/a	n/a	\$3.89	\$3.64	100%
24	PacifiCorp	\$47.21	\$44.11	\$23.61	\$22.06	\$23.61	\$22.06	50%
25	PGE	\$68.95	\$71.58	\$16.41	\$17.04	\$52.54	\$54.55	79%
26	Puget	\$116.46	\$121.48	\$23.85	\$24.88	\$92.61	\$96.60	83%
27	Total	\$251.46	\$257.36	\$71.34	\$72.24	\$180.12	\$185.11	

28

29 Note: the above numbers do not reflect the proposed settlement of Avista's deemer balance.
30 The result of the current public process on that subject will be accounted for in the final
31 Lookback Recovery and Return Study.

32

33 Under current projections, Idaho Power is forecast to receive no REP benefits in FY 2010 or FY
34 2011. As a result, Idaho Power's Lookback Amount is not expected to be reduced in this rate

1 period. BPA would apply \$16.41 million and \$17.04 million of PGE's REP benefits toward its
2 Lookback Amount in FY 2010 and FY 2011, respectively. BPA would apply \$23.85 million and
3 \$24.88 million of Puget's REP benefits toward its Lookback Amount in FY 2010 and FY 2011,
4 respectively. The amounts of REP benefits applied to PacifiCorp's and Avista's Lookback
5 Amounts are determined using the 50 percent threshold described previously. Lastly,
6 NorthWestern no longer has a Lookback Amount balance, as shown in Table 3 so it retains 100
7 percent of its REP benefits due. Table 3 shows the proposed amount of REP benefits to be
8 applied to each IOU's Lookback Amount for FY 2010 and FY 2011. For each IOU, Table 9
9 shows the end-of FY 2009 Lookback Amounts balances, the Lookback Amounts paid off in FY
10 2010-2011, and the resulting end-of FY 2011 Lookback Amounts balances.

11

12 **2.5 Time Frame for Recovery of Lookback Amounts**

13 Table 4 shows the year in which each IOU is expected to complete the amortization of its
14 Lookback Amount under the conservative assumption that REP benefits in FY 2012 and beyond
15 are fixed at FY 2011 levels. Current projections indicate that Puget and PGE would fully
16 amortize their Lookback Amounts in FY 2015. Avista and PacifiCorp would fully amortize their
17 Lookback Amounts in FY 2022 and FY 2024, respectively. However, a settlement of Avista's
18 deemer balance would affect the year of full amortization of Avista's Lookback Amount.

19

1
2 **Table 4**
3 **Projected Year Lookback Amounts are Fully Amortized**
4 **Assuming FY 2010 Benefit Levels Continue**

	A WP-07 Supplemental Rate Case	B WP-10 Initial Proposal
7	Avista	2018
8	Idaho Power	not amortized
9	Northwestern	2008
10	PacifiCorp	2020
11	PGE	2015
12	Puget	2015

13

14

15 **2.6 Accrual of Interest on Lookback Amount Balances**

16 In the WP-07 Supplemental Final Proposal, BPA determined that the unamortized Lookback
17 Amounts would accumulate interest monthly at the average daily Treasury bill rate for October
18 1, 2001, through September 30, 2007, that corresponds to the number of years that BPA expected
19 it would take for each IOU to repay its Lookback Amount. WP-07 Supplemental Final ROD,
20 WP-07-A-BPA-05, Section 8.10.2, and FY 2002-2008 Lookback Study, WP-07-FS-BPA-08, at
21 274. Therefore, if the expected amortization term in the WP-07 Supplemental Final Proposal
22 was seven years, the average daily interest rate over FY 2002-2007 on a seven-year T-bill rate
23 was used. Table 15.7 of the FY 2002-2008 Lookback Study shows the interest rate to be applied
24 monthly for each IOU for FY 2009. FY 2002-2008 Lookback Study, WP-07-FS-BPA-08, at
25 275. Table 5 shows the interest rates adopted in the WP-07 Supplemental Final Proposal. *Id.*
26 The FY 2002-2008 Lookback Study also stated that “[t]he rate of interest will be determined
27 each rate period.” FY 2002-2008 Lookback Study, WP-07-FS-BPA-08, at 274.

28

29 For the FY 2010-2011 rate period, the interest rates determined in the WP-07 Supplemental Final
30 Proposal for the IOUs’ respective Lookback Amounts are proposed to be used to calculate

1 interest on outstanding Lookback Amounts, even though the expected amortization periods for
2 PacifiCorp and Avista have changed. Interest would accrue monthly.

3

4 **Table 5**

5 **Interest Rates to be Applied to Each IOU's**

6 **Lookback Amount Balance**

	A Amortization Year 1/	B T-Bill Term	C Interest Rate Applied	
10	Avista	2018	10 year	4.64%
11	Idaho Power	2029+	20 year	5.03%
12	NorthWestern Energy	2008	n/a	n/a
13	PacifiCorp	2020	12 year	4.57%
14	Portland General Electric	2015	7 year	4.21%
15	Puget Sound Energy	2015	7 year	4.21%

16

17 1/ Amortization year as of the WP-07 Supplemental rate case, FY 2002-2008 Lookback Study, WP-
18 07-FS-BPA-08 at 276.

19

20 **2.7 Return of Lookback Amounts to Eligible COUs in FY 2010 and FY 2011**

21 The FY 2009 Lookback Amounts are being returned to eligible COUs as credits on their power
22 bills. To be eligible to receive these credits, the COU must have purchased power from BPA
23 under the PF-02 rate schedule. *See* WP-07 Supplemental Final ROD, WP-07-A-05, Section
24 9.3.2.

25

26 Similarly, the FY 2010 and FY 2011 Lookback Amounts are proposed to be returned to eligible
27 COUs as credits on power bills. These credits will be spread over the rate period in 24 equal
28 monthly amounts. These monthly amounts are calculated by first adding together the Lookback
29 Amounts to be recovered for FY 2010 (\$71,342,095) and FY 2011 (\$72,242,209), to reach a total
30 Lookback Amount recovery of \$143,584,304. This two-year total is then divided into the Slice
31 and non-Slice Lookback Credit Amounts. The non-Slice FY 2010-2011 Lookback Credit
32 Amount is then multiplied by the corrected utility-specific non-Slice PF-02 revenue shares, and

1 then divided by 24 to determine the monthly FY 2010-2011 Lookback Credit Amount for each
2 eligible non-Slice COU's power bill over the two years of the rate period. Section 3 describes
3 the derivation of the corrected PF-02 revenue shares.

4

5 The Slice FY 2010-2011 Lookback Credit Amount is similarly multiplied by the utility-specific
6 Slice share and divided by 24 to calculate the monthly utility-specific Slice FY 2010-2011
7 Lookback Credit Amounts.

8

9 Table 6 shows the proposed annual and utility-specific monthly Lookback Credit Amounts that
10 each eligible COU customer is expected to receive in FY 2010-2011.

11

1 **3. CORRECTIONS TO NON-SLICE REVENUE SHARES AND FY 2009 NON-**
2 **SLICE LOOKBACK CREDIT AMOUNTS**

3 **3.1 Corrections to the Non-Slice Revenue Shares Used to Allocate Lookback Credit**
4 **Amounts to Eligible Consumer-Owned Utilities**

5 Following publication of the WP-07 Supplemental Final Proposal, BPA Staff discovered various
6 omissions and errors in the PF-07 revenue data used to calculate the non-Slice COU percentages
7 used to determine the monthly utility-specific payments of non-Slice Lookback Credit Amounts
8 (called the Customer Payment Amounts) for FY 2007-2008. These errors included the use of 14
9 months of Conservation and Renewable Credits (CRC) rather than the appropriate 12 months,
10 exclusion of PF take-or-pay charges, omission of U.S. Bureau of Reclamation irrigation transfer
11 charges credited outside the period for use within the period, omission of the demand billing
12 charges for one customer, and general billing adjustments for months outside of FY 2007. In
13 December of 2008, BPA corrected these errors, and shared the revised percentages with
14 customers. Later, on February 5, 2009, BPA filed errata with the Federal Energy Regulatory
15 Commission and requested that the corrected information be reflected in the Final WP-07
16 Supplemental ROD and final studies.

17
18 Subsequently, upon inspection of the non-Slice PF-02 revenue data, BPA Staff determined that
19 some of the same errors identified in BPA's errata also occurred when calculating the COU
20 utility-specific PF-02 revenue shares used to allocate the total non-Slice Lookback Credit
21 Amount for FY 2009. Specifically, the PF-02 revenues and associated utility-specific
22 percentages did not account for certain take-or-pay charges, U.S. Bureau of Reclamation
23 irrigation credits, or the Load-Based Cost Recovery Adjustment Clause true-up amounts that
24 occurred after the end of FY 2006.

1 Table 7 shows the revised PF-02 revenues and revenue shares. No corrections are necessary for
2 the Slice shares used to calculate the FY 2009 Lookback Credit Amount, because the Slice
3 percentages have not changed.

4

5 These revised utility-specific non-Slice PF-02 revenue shares based on the corrected PF-02
6 revenue data will be used to calculate the FY 2010-2011 Lookback Credit Amounts for each
7 eligible COU for FY 2010 and FY 2011, and is expected to be used until the total Lookback
8 Amount is fully repaid to the eligible COUs.

9

10 Table 8 provides the corrected utility-specific non-Slice PF-02 revenue shares and corrected
11 utility-specific FY 2009 Lookback Credit Amounts, as well as the original values presented in
12 Table 15.10 of the FY 2002-008 Lookback Study (WP-07-FS-BPA-08 at 285-288). Table 8 also
13 presents the difference between the annual FY 2009 Lookback Credit Amount that each eligible
14 non-Slice COU currently expects to receive in FY 2009 and the corrected amount.

15

16 **3.2 Treatment of Corrected FY 2009 Non-Slice Lookback Amount Credits on Eligible**
17 **COU Power Bills**

18 It is proposed that the corrections shown in Table 8 would appear on October 2009 non-Slice
19 power bills issued in November 2009. A few customers would see a minor additional credit,
20 while most customers will see a minor debit. The total FY 2009 \$119.5 million non-Slice
21 Lookback Credit Amount is unchanged.

1

2 **4. PROPOSED AVISTA DEEMER SETTLEMENT**

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7 On January 28, 2009, BPA opened a public comment period concerning a proposed settlement of
8 Avista's outstanding deemer balance. This balance, which was assumed to be \$85.6 million as
9 of October 1, 2001, in the WP-07 Supplemental Final Proposal, was a factor in determining
10 Avista's Lookback Amount. A settlement, if executed in time, will be reflected in the WP-10
11 Final Proposal.

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Table 6
FY 2010-2011 Lookback Credit Amounts

This sheet calculates Slice credits for PNGC members only on their retained slice percentages the bulk is refunded in PNGC

A	B	C	D	E	F	G	H	I	J	K
1	Total FY 2010-2011 Lookback Credit Amount	\$ 143,584,304								
2	Slice FY 2010-2011 Lookback Credit Amount	\$ 32,489,969								
3	Non-Slice FY 2010-2011 Lookback Credit Amount	\$ 111,094,335								
4	Customer Name	Corrected Non-Slice PF-02 Revenue Share	Non-Slice Annual FY10-11 Lookback Credit Amount	Non-Slice Monthly FY10-11 Lookback Credit Amount	Slice Percent (Retained Slice for PNGC Members)	Slice % Share	Slice Annual FY10-11 Lookback Credit Amount	Slice Monthly FY10-11 Lookback Credit Amount	Total Annual FY10-11 Lookback Credit Amount	Total Monthly FY10-11 Lookback Credit Amount
5	6 Albion, City of	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
6	7 Alder Mutual	0.0107% \$	11,924	\$ 497	0.00000%	0.00000%	-	-	\$ 11,924	\$ 497
7	8 Ashland, City of	0.5455% \$	66,013	\$ 25,251	0.00000%	0.00000%	-	-	\$ 60,613	\$ 25,251
8	9 Asotin County PUD #1	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
9	10 Bandon, City of	0.1876% \$	208,438	\$ 8,685	0.00000%	0.00000%	-	-	\$ -	\$ -
10	11 Benton County PUD #1	1.3492% \$	1,498,333	\$ 62,456	1.76410%	7.79616%	2,532,971	\$ 105,540	\$ 208,438	\$ 8,685
11	12 Benton REA	1.2358% \$	1,372,898	\$ 57,204	0.00000%	0.00000%	-	-	\$ 4,031,904	\$ 167,996
12	13 Big Bend Elec Coop	0.6098% \$	677,446	\$ 28,227	0.00000%	0.00000%	-	-	\$ 1,372,898	\$ 57,204
13	14 Big Horn County Electric Coop.	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ 677,446	\$ 28,227
14	15 Blackby Lane Elec Coop	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
15	16 Blaine, City of	0.2043% \$	227,018	\$ 9,459	0.00000%	0.00000%	-	-	\$ 227,018	\$ 9,459
16	17 Bonners Ferry, City of	0.1540% \$	171,047	\$ 7,127	0.00000%	0.00000%	-	-	\$ 171,047	\$ 7,127
17	18 Bonney Lake, City of	0.3559% \$	395,404	\$ 16,475	0.00000%	0.00000%	-	-	\$ 395,404	\$ 16,475
18	19 Canby, City of	0.4958% \$	550,764	\$ 22,949	0.00000%	0.00000%	-	-	\$ 550,764	\$ 22,949
19	20 Cascade Locks, City of	0.0605% \$	67,209	\$ 2,800	0.00000%	0.00000%	-	-	\$ 67,209	\$ 2,800
20	21 Central Electric Coop	0.0000% \$	-	-	0.22965%	0.1490%	329,741	\$ 13,739	\$ 329,741	\$ 13,739
21	22 Central Lincoln PUD	1.6322% \$	1,813,272	\$ 75,533	0.00000%	0.00000%	-	-	\$ 1,813,272	\$ 75,533
22	23 Central Montana Electric Power Coop	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
23	24 Centralia, City of	0.5547% \$	616,189	\$ 25,675	0.00000%	0.00000%	-	-	\$ 616,189	\$ 25,675
24	25 Cheney, City of	0.3668% \$	407,487	\$ 16,979	0.00000%	0.00000%	-	-	\$ 407,487	\$ 16,979
25	26 Chehalis, City of	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
26	27 Clallam County PUD #1	1.7582% \$	1,953,215	\$ 81,384	0.00000%	0.00000%	-	-	\$ 1,953,215	\$ 81,384
27	28 Clark County PUD #1	8.0074% \$	8,895,338	\$ 370,656	0.00000%	0.00000%	-	-	\$ 8,895,338	\$ 370,656
28	29 Claristanie PUD	0.8243% \$	915,778	\$ 38,157	0.97550%	4.31107%	1,400,965	\$ 58,361	\$ 2,316,443	\$ 96,518
29	30 Clearwater Power	0.0000% \$	-	-	0.08223%	0.36340%	118,069	\$ 4,920	\$ 118,069	\$ 4,920
30	31 Columbia Basin Elec Coop	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
31	32 Columbia Power Coop	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
32	33 Columbia REA	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
33	34 Columbia River PUD	0.8965% \$	995,240	\$ 41,498	0.00000%	0.00000%	-	-	\$ 995,940	\$ 41,498
34	35 Consolidated Irrigation District #19	0.0062% \$	6,848	\$ 285	0.00000%	0.00000%	-	-	\$ 6,848	\$ 285
35	36 Consumers Power	0.0000% \$	-	-	0.14518%	0.64160%	208,456	\$ 8,686	\$ 208,456	\$ 8,686
36	37 Coos Curry Elec Coop	0.0000% \$	-	-	0.13270%	0.58645%	190,536	\$ 7,939	\$ 190,536	\$ 7,939
37	38 Coulee Dam, City of	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
38	39 Cowlitz County PUD #1	11.6409% \$	12,932,368	\$ 538,849	0.00000%	0.00000%	-	-	\$ 12,932,368	\$ 538,849
39	40 DeGolyer, City of	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
40	41 Douglas Electric Cooperative	0.0000% \$	-	-	0.06518%	0.28805%	93,388	\$ 3,900	\$ 93,388	\$ 3,900
41	42 Drift, City of	0.0645% \$	7,619	\$ 2,984	0.00000%	0.00000%	-	-	\$ 71,619	\$ 2,984
42	43 East End Mutual Electric	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
43	44 Eatonville, Town of	0.0785% \$	87,189	\$ 3,633	0.00000%	0.00000%	-	-	\$ 87,189	\$ 3,633
44	45 Ellensburg, City of	0.5916% \$	657,268	\$ 27,386	0.00000%	0.00000%	-	-	\$ 657,268	\$ 27,386
45	46 Elmhurst, Mutual P & L	0.0000% \$	-	-	0.00000%	0.00000%	-	-	\$ -	\$ -
46	47 Emerald County PUD	1.2717% \$	1,412,798	\$ 58,867	0.00000%	0.00000%	-	-	\$ 1,412,798	\$ 58,867
47	48 Energy Northwest	0.0689% \$	76,396	\$ 3,192	0.00000%	0.00000%	-	-	\$ 76,596	\$ 3,192
48	49 Eugene Water & Electric Board	1.8882% \$	2,097,702	\$ 87,404	2.43280%	10,751,38%	\$ 3,493,119	\$ 145,547	\$ 5,590,821	\$ 232,951

		A	B	C	D	E	F	G	H	I	Total PF-02 Revenues	Non-Slice PF-02 Revenue Share
		FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	FY 2007 /I					
53	NORTHERN WASCO COUNTY PUD	\$ 5,485,253	\$ 5,468,480	\$ 5,020,388	\$ 4,756,371	\$ 7,152,750	\$ (122,058)	\$ 27,761,184	0.5713%			
54	OKANOGAN COUNTY PUD NO 1	\$ 3,849,532	\$ 3,844,192	\$ 3,848,285	\$ 3,542,959	\$ 3,409,933	\$ (17,198)	\$ 18,537,703	0.3815%			
55	OREGON TRAIL ELECTRIC COOP	\$ 17,686,959	\$ 17,911,985	\$ 17,837,006	\$ 16,689,131	\$ 18,010,357	\$ (236,502)	\$ 87,898,366	1.8099%			
56	PACIFIC COUNTY PUD NO 2	\$ 8,516,987	\$ 8,737,832	\$ 9,438,574	\$ 9,031,776	\$ 7,576,571	\$ (75,996)	\$ 43,225,744	0.8896%			
57	PACIFIC NORTHWEST GENERATING CO	\$ 30,969,117	\$ 31,183,043	\$ 31,060,269	\$ 28,327,574	\$ 28,430,721	\$ (310,900)	\$ 150,259,824	3.0923%			
58	PEND OREILLE COUNTY PUD NO 1	\$ 2,809,674	\$ 3,086,179	\$ 3,112,313	\$ 2,464,573	\$ 4,137,30	\$ (3,760)	\$ 11,873,709	0.2444%			
59	PENINSULA LIGHT COMPANY	\$ 15,430,337	\$ 15,827,352	\$ 16,711,425	\$ 15,593,301	\$ 16,036,004	\$ (143,190)	\$ 79,460,229	1.6353%			
60	PLUMMER	\$ 883,400	\$ 952,851	\$ 956,038	\$ 912,667	\$ 940,744	\$ (9,622)	\$ 4,636,078	0.0949%			
61	PORT ANGELES	\$ 14,822,801	\$ 15,610,746	\$ 19,114,585	\$ 17,479,815	\$ 18,662,421	\$ (20,702)	\$ 85,488,666	1.7533%			
62	RICHLAND	\$ 18,935,965	\$ 20,390,726	\$ 21,659,979	\$ 20,388,984	\$ 21,222,808	\$ (264,334)	\$ 102,334,128	2.1000%			
63	RUPERT	\$ 2,423,628	\$ 2,391,604	\$ 2,435,526	\$ 2,361,285	\$ 2,380,970	\$ (24,338)	\$ 11,968,975	0.2463%			
64	SALEM ELECTRIC	\$ 11,722,822	\$ 11,826,219	\$ 12,032,853	\$ 10,508,022	\$ 10,217,666	\$ (112,826)	\$ 56,194,756	1.1565%			
65	SEATTLE CITY LIGHT	\$ 36,586,217	\$ 36,617,511	\$ 33,354,266	\$ 31,036,898	\$ 30,060,064	\$ (200,982)	\$ 167,453,74	3.4461%			
66	SKAMANIA COUNTY PUD NO 1	\$ 3,408,830	\$ 3,582,090	\$ 3,846,749	\$ 3,606,532	\$ 3,715,452	\$ (34,864)	\$ 18,124,789	0.3740%			
67	SNOHOMISH COUNTY PUD NO 1	\$ 73,960,835	\$ 87,421,289	\$ 87,212,006	\$ 81,085,921	\$ 79,543,517	\$ (766,348)	\$ 407,609,540	8.3884%			
68	SPRINGFIELD UTILITY BOARD	\$ 15,747,962	\$ 15,655,972	\$ 16,161,345	\$ 16,130,151	\$ 16,988,188	\$ (160,058)	\$ 80,523,640	1.6571%			
69	SUMAS	\$ 623,341	\$ 731,782	\$ 807,332	\$ 811,342	\$ 881,749	\$ (11,194)	\$ 3,844,352	0.0791%			
70	SURPRISE VALLEY ELECTRIFICATION CORP	\$ 2,905,326	\$ 2,715,226	\$ 2,871,009	\$ 2,463,008	\$ 2,502,372	\$ (37,924)	\$ 13,419,017	0.2762%			
71	TACOMA POWER	\$ 94,079,877	\$ 98,825,285	\$ 99,875,524	\$ 101,547,464	\$ 95,520,441	\$ (1,029,498)	\$ 488,819,093	10.0597%			
72	TANNER ELECTRIC COOPERATIVE	\$ 1,898,099	\$ 1,951,286	\$ 2,039,445	\$ 1,911,198	\$ 1,966,554	\$ (18,278)	\$ 9,748,304	0.2066%			
73	THILLAMOOK COUNTY PUD NO 1	\$ 9,316,959	\$ 9,109,726	\$ 9,833,972	\$ 9,311,162	\$ 9,703,158	\$ (95,804)	\$ 47,179,173	0.9709%			
74	TOWN OF EATONVILLE	\$ 745,684	\$ 759,341	\$ 778,762	\$ 747,916	\$ 787,804	\$ (6,420)	\$ 3,813,087	0.0755%			
75	TOWN OF STIELACOOM	\$ 1,181,193	\$ 1,176,578	\$ 1,213,485	\$ 1,120,986	\$ 1,446,664	\$ (3,78)	\$ 5,829,528	0.1200%			
76	UNIMPOUA INDIANUTILITY COOPERATIVE	\$ 409,956	\$ 480,936	\$ 542,952	\$ 579,742	\$ 568,024	\$ (7,112)	\$ 2,573,041	0.0530%			
77	UNITED ELECTRIC COOPERATIVE INC	\$ 4,870,775	\$ 4,889,747	\$ 4,941,421	\$ 4,380,109	\$ 4,632,460	\$ (60,402)	\$ 23,654,110	0.4889%			
78	US DOE NATL ENERGY TECHNOLOGY LAB	\$ 112,945	\$ 112,205	\$ 108,535	\$ 102,602	\$ 106,604	\$ (696)	\$ 542,195	0.0112%			
79	US DOE RICHLAND OPERATIONS OFFICE	\$ 6,943,638	\$ 6,996,236	\$ 6,583,131	\$ 5,833,321	\$ 5,432,862	\$ (56,878)	\$ 31,732,310	0.6540%			
80	US DOI BUREAU OF INDIAN AFFAIRS WAPATO	\$ 129,237	\$ 167,758	\$ 181,933	\$ 168,220	\$ 186,963	\$ (5,336)	\$ 828,235	0.0170%			
81	USAFA FAIRCHILD	\$ 1,059,045	\$ 2,076,452	\$ 2,069,069	\$ 1,952,977	\$ 1,888,141	\$ (24,086)	\$ 9,921,978	0.2042%			
82	USN BANGOR	\$ 5,006,008	\$ 5,065,531	\$ 5,350,512	\$ 4,625,720	\$ 4,872,986	\$ (53,786)	\$ 24,866,971	0.5118%			
83	USN BREMERTON	\$ 6,782,073	\$ 6,481,676	\$ 8,588,270	\$ 7,106,510	\$ 6,731,590	\$ (86,450)	\$ 35,603,669	0.7377%			
84	USN EVERETT	\$ 3,45,519	\$ 3,72,485	\$ 3,90,088	\$ 3,30,968	\$ 3,33,879	\$ (3,638)	\$ 1,769,301	0.0364%			
85	VERA WATER AND POWER	\$ 5,823,810	\$ 6,403,906	\$ 6,611,258	\$ 6,104,867	\$ 6,386,388	\$ (72,514)	\$ 31,257,715	0.6433%			
86	WAHIAKUM COUNTY PUD NO 1	\$ 1,044,542	\$ 1,037,907	\$ 1,106,528	\$ 1,049,140	\$ 1,106,388	\$ (8,722)	\$ 5,335,683	0.1098%			
87	WELLS RURAL ELECTRIC COMPANY	\$ 11,707,108	\$ 11,974,223	\$ 11,963,143	\$ 13,913,955	\$ 14,382,385	\$ (191,606)	\$ 63,749,308	1.3119%			
88	WHATCOM COUNTY PUD NO 1	\$ 5,593,838	\$ 5,485,748	\$ 6,411,135	\$ 6,113,487	\$ 6,910,382	\$ (67,547)	\$ 29,532,452	0.6078%			
89	YAKAMA POWER	\$ 941,289,503	\$ 994,804,123	\$ 1,008,598,801	\$ 963,033,478	\$ 962,271,122	\$ (10,819,546)	\$ 4,859,177,481	0.0096%			
90		\$ 91 Grand Total	\$ 92								100%	

Table 8
Corrected Utility-Specific Non-Slice FY 09 Lookback Credit Amounts

This sheet calculates Slice credits for PNGC members only on their retained slice percentages the bulk is refunded in PNCG

A	B	C	D	E	F	G	H	I
1	Annual FY 09 Lookback Credit Amount	\$ 154,477,000						
2	Slice Annual FY 09 Lookback Credit Amount	\$ 34,954,747						
3	Non-Slice Annual FY 09 Lookback Credit Amount	\$ 119,522,253						
4	Name	Corrected Non-Slice PF-02 Revenues	Corrected Non-Slice PF-02 Revenue Share	Corrected Non-Slice Annual FY09 Lookback Credit Amount	Non-Slice PF-02 Revenues	Non-Slice PF-02 Revenue Share	Non-Slice Annual FY09 Lookback Credit Amount	WP-07 Supplemental Original
5								FY 09 Lookback Non-Slice Correction
6	Albion, City of	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	-
7	Alder Mutual	\$ 521,487	0.0107%	\$ 12,829	\$ 522,385	0.0107%	\$ 12,837	\$ (8)
8	Ashland, City of	\$ 26,503,084	0.5453%	\$ 651,986	\$ 26,566,826	0.5462%	\$ 652,870	\$ (884)
9	Austin County PUD #1	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
10	Bandon, City of	\$ 9,115,740	0.1876%	\$ 224,251	\$ 9,133,752	0.1878%	\$ 224,459	\$ (208)
11	Benton County PUD #1	\$ 65,553,689	1.3492%	\$ 1,612,647	\$ 65,727,011	1.3514%	\$ 1,615,218	\$ (2,571)
12	Benton REA	\$ 60,041,721	1.2358%	\$ 1,477,050	\$ 60,213,637	1.2380%	\$ 1,479,720	\$ (2,679)
13	Big Bend Elec Coop	\$ 29,627,132	0.6098%	\$ 728,839	\$ 29,954,339	0.6159%	\$ 736,117	\$ (728)
14	Big Horn County Electric C. Coop.	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
15	Blachly Lane Elec Coop	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
16	Blaine, City of	\$ 9,928,284	0.2043%	\$ 244,240	\$ 9,950,918	0.2046%	\$ 244,540	\$ (300)
17	Bonners Ferry, City of	\$ 7,480,515	0.1540%	\$ 184,024	\$ 7,492,473	0.1541%	\$ 184,125	\$ (101)
18	Burley, City of	\$ 17,292,443	0.3559%	\$ 425,401	\$ 17,332,955	0.3564%	\$ 425,951	\$ (550)
19	Canby, City of	\$ 24,086,860	0.4958%	\$ 592,546	\$ 24,141,714	0.4964%	\$ 593,274	\$ (728)
20	Cascade Locks, City of	\$ 2,939,295	0.0605%	\$ 72,308	\$ 2,945,213	0.0606%	\$ 72,378	\$ (70)
21	Central Electric Coop	\$ 0.0000%	\$ -	\$ 0.0000%	\$ -	0.0000%	\$ -	-
22	Central Lincoln PUD	\$ 79,300,824	1.6322%	\$ 1,950,832	\$ 79,517,118	1.6349%	\$ 1,954,105	\$ (3,273)
23	Central Montana Electric Power Coop	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
24	Centralia, City of	\$ 26,948,115	0.5547%	\$ 662,934	\$ 27,001,283	0.5552%	\$ 663,547	\$ (613)
25	Cheney, City of	\$ 17,820,873	0.3668%	\$ 438,401	\$ 17,859,927	0.3672%	\$ 438,901	\$ (500)
26	Chewelah, City of	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
27	Clallam County PUD #1	\$ 85,421,031	1.7582%	\$ 2,101,391	\$ 85,567,949	1.7593%	\$ 2,102,802	\$ (1,411)
28	Clark County PUD #1	\$ 389,042,226	8.0074%	\$ 9,570,592	\$ 389,736,250	8.0133%	\$ 9,577,632	\$ (7,040)
29	Clatskanie PUD	\$ 40,050,220	0.8243%	\$ 985,251	\$ 40,149,120	0.8255%	\$ 986,651	\$ (1,400)
30	Cleanwater Power	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
31	Columbia Basin Elec Coop	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
32	Columbia Power Coop	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
33	Columbia REA	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
34	101113 Columbia River PUD	\$ 43,556,001	0.8965%	\$ 1,071,495	\$ 43,654,077	0.8976%	\$ 1,072,784	\$ (1,289)
35	101116 Consolidated Irrigation District #19	\$ 299,502	0.0062%	\$ 7,368	\$ 300,162	0.0062%	\$ 7,376	\$ (8)
36	101118 Consumers Power	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
37	10121 Coos Curry Elec Coop	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
38	10378 Coulee Dam, City of	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
39	10123 Cowlitz County PUD #1	\$ 565,578,431	11.6409%	\$ 13,913,453	\$ 561,108,504	11.5368%	\$ 13,789,046	\$ 124,407
40	1070 Deedt, City of	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
41	10136 Douglas Electric Cooperative	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
42	10771 Drain, City of	\$ 3,132,153	0.0645%	\$ 77,032	\$ 3,138,517	0.0645%	\$ 77,128	\$ (76)
43	10142 East End Mutual Electric	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
44	10144 Eatonville, Town of	\$ 3,813,087	0.0785%	\$ 93,803	\$ 3,819,507	0.0785%	\$ 93,863	\$ (60)
45	10722 Elletsburg, City of	\$ 28,744,653	0.5916%	\$ 707,130	\$ 28,811,521	0.5924%	\$ 708,033	\$ (903)
46	10156 Elmhurst Mutual P & L	\$ -	0.0000%	\$ -	\$ 0.0000%	\$ -	\$ -	-
47	10157 Emerald County PUD	\$ 61,786,661	1.2717%	\$ 1,519,976	\$ 61,921,033	1.2731%	\$ 1,521,688	\$ (1,712)
48	10158 Energy Northwest	\$ 3,349,802	0.0689%	\$ 82,406	\$ 3,357,052	0.0690%	\$ 82,498	\$ (92)
49	10170 Eugene Water & Electric Board	\$ 91,739,953	1.8882%	\$ 2,256,839	\$ 91,893,479	1.8894%	\$ 2,258,250	\$ (1,411)
50	10172 Fairchild AFB	\$ 9,921,598	0.2042%	\$ 244,075	\$ 9,945,684	0.2045%	\$ 244,412	\$ (337)

Table 8
Corrected Utility-Specific Non-Slice FY 09 Lookback Credit Amounts

	A	B	C	D	E	F	G	H	I
1	Annual FY 09 Lookback Credit Amount		\$ 154,477,000						
2	Slice Annual FY 09 Lookback Credit Amount		\$ 34,954,747						
3	Non-Slice Annual FY 09 Lookback Credit Amount		\$ 119,522,253						
4	Name	Corrected Non-Slice PF-02 Revenues	Corrected Non-Slice PE-02 Revenue Share	Corrected Non-Slice Annual FY09 Lookback Credit Amount	Corrected Non-Slice Annual FY09 Lookback Credit Amount	Non-Slice PE-02 Revenues	Non-Slice PF-02 Revenues	Non-Slice Annual FY09 Lookback Credit Amount	FY 09 Lookback Non-Slice Correction
51	Fall River Elec Coop	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
52	Farmers Electric Company	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
53	Ferry County PUD #1	\$ 11,137,412	0.2057%	\$ 273,985	\$ 11,151,826	0.20560%	\$ 274,052	0.20560%	\$ (67)
54	Flathead Elec Coop	\$ 99,778,075	0.5712%	\$ 2,454,580	\$ 99,995,903	0.57119%	\$ 2,457,364	0.57119%	\$ (2,784)
55	Forest Grove, City of	\$ 27,753,860	0.5792%	\$ 682,756	\$ 27,816,438	0.57919%	\$ 683,579	0.57919%	\$ (823)
56	Franklin County PUD #1	\$ 28,141,565	0.0000%	\$ 692,294	\$ 28,237,705	0.5806%	\$ 692,932	0.5806%	\$ (1,638)
57	Glacier Elec Coop	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
58	Grant County PUD #2	\$ 188,058,986	3.8707%	\$ 4,626,325	\$ 188,681,490	3.8794%	\$ 4,636,782	3.8794%	\$ (10,457)
59	Grays Harbor PUD #1	\$ 47,553,665	0.9788%	\$ 1,169,839	\$ 47,649,011	0.9797%	\$ 1,170,958	0.9797%	\$ (1,119)
60	Hanney Elec Coop	\$ 14,994,607	0.3086%	\$ 368,873	\$ 15,050,525	0.3094%	\$ 368,861	0.3094%	\$ (988)
61	Hermitton, City of	\$ 16,436,038	0.3333%	\$ 404,333	\$ 16,478,248	0.3389%	\$ 404,947	0.3389%	\$ (614)
62	Heyburn, City of	\$ 8,295,872	0.1707%	\$ 204,082	\$ 8,307,178	0.1708%	\$ 204,146	0.1708%	\$ (64)
63	Hood River Elec Coop	\$ 14,732,263	0.3032%	\$ 362,419	\$ 14,764,423	0.3036%	\$ 362,831	0.3036%	\$ (412)
64	Idaho County L & P	\$ 6,400,997	0.1317%	\$ 157,467	\$ 6,413,839	0.1319%	\$ 157,618	0.1319%	\$ (151)
65	Idaho Falls Power	\$ 27,899,481	0.5742%	\$ 686,338	\$ 27,957,213	0.5748%	\$ 687,039	0.5748%	\$ (701)
66	Inland P & L	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
67	Kittitas County PUD #1	\$ 7,886,149	0.1623%	\$ 194,002	\$ 7,903,063	0.1625%	\$ 194,215	0.1625%	\$ (213)
68	Klickitat County PUD #1	\$ 35,974,119	0.7040%	\$ 884,978	\$ 36,059,733	0.7141%	\$ 886,155	0.7141%	\$ (1,177)
69	Kootenai Electric Coop	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
70	Lakeview L & P (WA)	\$ 42,983,094	0.8847%	\$ 1,057,401	\$ 43,063,630	0.8854%	\$ 1,058,274	0.8854%	\$ (873)
71	Lane County Elec Coop	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
72	Lewis County PUD #11	\$ 118,233,668	2.4335%	\$ 2,908,595	\$ 118,482,188	2.4361%	\$ 2,911,658	2.4361%	\$ (3,063)
73	Lincoln Elec Coop (MT)	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
74	Lost River Elec Coop	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
75	Lower Valley Energy	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
76	Mason County PUD #1	\$ 8,547,681	0.1759%	\$ 210,276	\$ 8,563,639	0.1761%	\$ 210,448	0.1761%	\$ (172)
77	Mason County PUD #3	\$ 89,282,630	1.8376%	\$ 2,196,388	\$ 89,452,196	1.8392%	\$ 2,198,256	1.8392%	\$ (1,868)
78	McClarey, City of	\$ 5,837,540	0.1201%	\$ 143,606	\$ 5,849,106	0.1203%	\$ 143,740	0.1203%	\$ (1,34)
79	McMinnville, City of	\$ 97,396,893	0.2004%	\$ 2,396,002	\$ 97,667,399	0.20081%	\$ 2,400,142	0.20081%	\$ (4,140)
80	Midstate Elec Coop	\$ 47,133,494	0.9701%	\$ 1,159,503	\$ 47,225,040	0.9710%	\$ 1,160,539	0.9710%	\$ (1,036)
81	Milton Freewater, City of	\$ 12,628,309	0.2509%	\$ 310,661	\$ 12,652,069	0.2601%	\$ 310,920	0.2601%	\$ (259)
82	Milton, City of	\$ 8,812,635	0.1814%	\$ 216,794	\$ 8,830,001	0.1816%	\$ 216,994	0.1816%	\$ (200)
83	Mindoka, City of	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
84	Mission Valley	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
85	Misoula Elec Coop	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
86	Modern Elec Coop	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
87	Monmouth, City of	\$ 9,780,069	0.2013%	\$ 240,594	\$ 9,798,771	0.2015%	\$ 240,801	0.2015%	\$ (207)
88	Nespelem Valley Elec Coop	\$ 5,799,091	0.1194%	\$ 142,660	\$ 5,815,287	0.1196%	\$ 142,909	0.1196%	\$ (249)
89	Northern Lights	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
90	Northern Wasco County PUD	\$ 27,761,184	0.5714%	\$ 682,936	\$ 27,883,242	0.5733%	\$ 685,221	0.5733%	\$ (2,285)
91	Ohop Mutual Light Company	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
92	Okanagan County Elec Coop	\$ 18,537,703	0.3815%	\$ 456,035	\$ 18,574,042	0.3819%	\$ 456,451	0.3819%	\$ (416)
93	Okanagan County PUD #1	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -
94	Orcas P & L	\$ 87,988,936	1.8092%	\$ 2,162,349	\$ 88,155,438	1.8121%	\$ 2,162,898	1.8121%	\$ (3,549)
95	Oregon Trail Coop	\$ -	0.0000%	\$ -	\$ -	0.0000%	\$ -	0.0000%	\$ -

Table 8
Corrected Utility-Specific Non-Slice FY 09 Lookback Credit Amounts

This sheet calculates Slice credits for PNGC members only on their retained slice percentages the bulk is refunded in PNPGC

A	B	C	D	E	F	G	H	I
1	Annual FY 09 Lookback Credit Amount	\$ 154,477,000						
2	Slice Annual FY 09 Lookback Credit Amount	\$ 34,954,747						
3	Non-Slice Annual FY 09 Lookback Credit Amount	\$ 119,522,253						
4	Name	Corrected Non-Slice PF-02 Revenues	Corrected Non-Slice PF-02 Revenue Share	Corrected Non-Slice Annual FY09 Lookback Credit Amount	Non-Slice PF-02 Revenues	Non-Slice PF-02 Revenue Share	Non-Slice Annual FY09 Lookback Credit Amount	WP-07 Supplemental Original
96	Pacific County PUD #2	\$ 43,225,744	0.8897% \$	\$ 1,063,370	\$ 43,301,740	0.8903% \$	\$ 1,064,125	\$ (755)
97	Parkland I. & W Pend Oreille County PUD #1	\$ -	0.0000% \$	\$ -	\$ -	0.0000% \$	\$ -	\$ -
98	Peninsula Light Company	\$ 11,873,709	0.2444% \$	\$ 292,098	\$ 11,877,469	0.2442% \$	\$ 291,885	\$ 213
99	Plummer, City of	\$ 79,460,229	1.6355% \$	\$ 1,954,753	\$ 79,603,419	1.6367% \$	\$ 1,956,226	\$ (1,473)
100	PNGC	\$ 4,636,078	0.0954% \$	\$ 114,049	\$ 4,645,700	0.0955% \$	\$ 114,166	\$ (1,17)
101	Port Angeles, City of	\$ 150,259,824	3.0927% \$	\$ 3,696,451	\$ 150,570,724	3.0958% \$	\$ 3,700,223	\$ (3,772)
102	Port of Seattle	\$ 84,861,330	1.7466% \$	\$ 2,087,622	\$ 1,7490% \$	2,090,394	\$ 2,090,394	\$ (2,772)
103	Port Sound Naval Shipyard (Bremerton)	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
104	Raft River Elec Coop	\$ 35,603,669	0.7328% \$	\$ 875,864	\$ 35,690,119	0.7338% \$	\$ 877,072	\$ (1,208)
105	Ravalli County Elec Coop	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
106	Ridland, City of	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
107	Riverside Elec Company	\$ 102,334,128	2.1063% \$	\$ 2,517,460	\$ 102,598,462	2.1095% \$	\$ 2,521,321	\$ (3,861)
108	Rupert, City of	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
109	Soda Springs, City of	\$ 11,968,975	0.2463% \$	\$ 294,442	\$ 11,993,313	0.2466% \$	\$ 294,731	\$ (289)
110	Salem Elec Coop	\$ 56,194,756	1.1566% \$	\$ 1,382,413	\$ 56,307,582	1.1577% \$	\$ 1,383,739	\$ (1,326)
111	Salmon River Elec Coop	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
112	Seattle City Light	\$ 167,453,974	3.4466% \$	\$ 4,119,434	\$ 167,654,956	3.4477% \$	\$ 4,120,062	\$ (628)
113	Skamania County PUD #1	\$ 18,124,89	0.3730% \$	\$ 445,877	\$ 18,159,653	0.3734% \$	\$ 446,267	\$ (390)
114	Snohomish County PUD #1	\$ 407,609,649	8.3895% \$	\$ 10,027,358	\$ 408,375,997	8.3965% \$	\$ 10,035,698	\$ (8,340)
115	Southern MT G&T	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
116	South Side Electric	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
117	Springfield Utility Board	\$ 80,525,560	1.6574% \$	\$ 1,980,911	\$ 80,683,618	1.6589% \$	\$ 1,982,772	\$ (1,861)
118	Stetiacon, Town of	\$ 5,829,528	0.1200% \$	\$ 143,409	\$ 5,838,906	0.1201% \$	\$ 143,489	\$ (80)
119	Sumas, City of	\$ 3,844,352	0.0791% \$	\$ 94,573	\$ 3,855,546	0.0793% \$	\$ 94,749	\$ (176)
120	Surprise Valley Elec Coop	\$ 13,419,017	0.2762% \$	\$ 330,113	\$ 13,456,941	0.2767% \$	\$ 330,700	\$ (587)
121	Tacoma Public Utilities	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
122	Tanner Elec Coop	\$ 488,819,093	10.0610% \$	\$ 12,025,143	\$ 489,848,591	10.0716% \$	\$ 12,037,858	\$ (12,715)
123	Tillamook PUD #1	\$ 9,748,304	0.02006% \$	\$ 239,812	\$ 9,766,582	0.02008% \$	\$ 240,010	\$ (198)
124	Troy, City of	\$ 47,179,173	0.9711% \$	\$ 1,160,626	\$ 47,274,977	0.9720% \$	\$ 1,161,766	\$ (1,140)
125	U.S. DOE-Albany	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
126	U.S. Naval Station, Everett (Jim Creek)	\$ 542,195	0.0112% \$	\$ 13,338	\$ 542,891	0.0112% \$	\$ 13,341	\$ (3)
127	U.S. Naval Submarine Base, Bangor	\$ 1,769,301	0.0364% \$	\$ 43,526	\$ 1,772,939	0.0365% \$	\$ 43,569	\$ (43)
128	Vera Irrigation District	\$ 24,866,971	0.5118% \$	\$ 611,737	\$ 24,920,757	0.5124% \$	\$ 612,419	\$ (682)
129	Umatilla Elec Coop	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
130	Umpqua Indian Utility Cooperative	\$ 2,573,041	0.0530% \$	\$ 63,298	\$ 2,580,153	0.0530% \$	\$ 63,406	\$ (108)
131	United Electric Coop	\$ 23,654,110	0.4869% \$	\$ 581,900	\$ 23,714,389	0.4876% \$	\$ 582,773	\$ (873)
132	USBLA Wapato	\$ 828,235	0.0170% \$	\$ 20,375	\$ 833,571	0.0171% \$	\$ 20,488	\$ (110)
133	USDOE-Riceland	\$ 31,732,310	0.6531% \$	\$ 780,627	\$ 31,789,188	0.6536% \$	\$ 781,208	\$ (581)
134	Wasco Elec Coop	\$ 31,257,715	0.6434% \$	\$ 768,952	\$ 31,330,229	0.6442% \$	\$ 769,929	\$ (977)
135	Wigilante Elec Coop	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
136	Wanklikum County PUD #1	\$ 5,335,683	0.1098% \$	\$ 131,260	\$ 5,344,405	0.1099% \$	\$ 131,337	\$ (77)
137	Wasco Elec Coop	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
138	Weiser, City of	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
139	Wells Rural Electric Company	\$ 63,749,308	1.3121% \$	\$ 1,568,258	\$ 63,940,914	1.3147% \$	\$ 1,571,326	\$ (3,068)
140	West Oregon Elec Coop	\$ -	0.0000% \$	\$ -	\$ 0.0000% \$	-	\$ -	\$ -
141	Whatcom County PUD #1	\$ 29,532,452	0.6078% \$	\$ 726,510	\$ 29,614,590	0.6089% \$	\$ 727,768	\$ (1,258)
142	Yakama Power	\$ 467,547	0.0096% \$	\$ 11,502	\$ 467,547	0.0096% \$	\$ 11,490	\$ 12
144	TOTAL	\$ 4,858,550,145	100.0000% \$	\$ 119,522,251	\$ 4,863,639,949	100.0000% \$	\$ 119,522,248	\$ 3

Table 9
**End-of-FY 2009 Lookback Balances, Lookback Amounts Paid Off in FY 2010-2011,
and End-of-FY 2011 Lookback Balances**
(\$ in millions)

	A End-of-FY 2009 Lookback Balance	B Lookback Amount Paid Off	C End-of-FY 2011 Lookback Balance
Avista	\$ 77.58	\$15.74	\$ 68.05
Idaho Power	\$107.56	\$ 0	\$118.37
NorthWestern	\$ 0	\$ 0	\$ 0
PacifiCorp	\$233.95	\$ 45.67	\$207.51
PGE	\$ 90.48	\$ 33.45	\$ 63.23
Puget	\$131.94	\$ 48.73	\$ 92.24
Total	\$641.51	\$143.58	\$549.39

Note: The total ending balance for FY 2011 includes the accrual of \$51.47 million of interest in FY 2010-2011.

BONNEVILLE POWER ADMINISTRATION

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