

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1209**

4 In the Matter of )  
5 MidAmerican Energy Holdings Company ) **RESPONSE OF RENEWABLE NW**  
6 and PacifiCorp ) **PROJECT AND NRDC TO BENCH**  
7 Joint Application for an Order Authorizing ) **REQUEST**  
8 MEHC to Exercise Substantial Influence )  
9 Over the Policies and Actions of )  
10 PacifiCorp )

11 **I. HARMS DISCUSSED IN RNP’S AND NRDC’S OPENING COMMENTS AND**  
12 **TESTIMONY**

13 RNP and NRDC offered the testimony of RNP’s Director, Rachel Shimshak in UM 1209.  
14 In her testimony, Ms. Shimshak noted that MEHC had included preliminary commitments about  
15 renewable resources and energy efficiency and had acknowledged the environmental significance of  
16 greenhouse gas emissions—all issues of importance to RNP and NRDC. Ms. Shimshak noted that  
17 under its current ownership, PacifiCorp had provided leadership on certain climate and other  
18 environmental issues that are important to its customers and the public generally. The primary  
19 “harm” that Ms. Shimshak noted was the uncertainty whether PacifiCorp would continue this  
20 leadership under the ownership of MEHC. In addition, Ms. Shimshak identified seven areas in  
21 which MEHC needed to make additional commitments and give additional assurances in order to  
22 meet the statutory standard of serving “the public utility’s customers in the public interest.” ORS  
23 757.511(3). These seven areas were:

- 24 1. Make a stronger commitment to acquiring renewable resources;
- 25 2. Clarify the connection between planned transmission investments and renewable  
26 acquisitions;
- 3. Commit to implementing a conditional-firm transmission product pilot project  
program within one year;

- 1 4. Evaluate and report on flows on PacifiCorp's transmission system;
- 2 5. Implement a stable rate Blue Sky product;
- 3 6. Make a strong commitment to reducing greenhouse gas emissions;
- 4 7. Agree to support national policies that reduce global climate change.

5 In particular, in her testimony, Ms. Shimshak expressed a concern about PacifiCorp's two  
6 year delay in starting the process of acquiring their IRP's 1400 MW of cost-effective renewable  
7 resources over the "next" ten years, and a concern about the strength of Applicant's commitment to  
8 acquire 100 MW of cost-effective wind power within one year of closing the transaction. She also  
9 noted that PacifiCorp had been a leader in the region for recognizing the potential for future  
10 regulation of global warming, and that she was concerned about the lack of a plan by MEHC to  
11 address climate change with real emission reductions. Ms. Shimshak explained that wind energy  
12 provides benefits by being highly cost competitive with other new resources, by providing stable  
13 prices, resource diversity, no harmful emissions, and wind has very short lead times.

14 In her testimony, Ms. Shimshak noted that Applicants' new transmission project proposals,  
15 particularly the Walla Walla project, provided a real long term opportunity for PacifiCorp to  
16 integrate more renewable resources into its system, but she expressed a concern about the strength  
17 of Applicants' commitment to these projects. Ms. Shimshak also expressed a concern whether  
18 Applicants were saying that PacifiCorp might not go forward with its commitment to acquire the  
19 1400 MW of renewable resources if it did not proceed with the new transmission projects. Ms.  
20 Shimshak pointed out that without the new transmission projects PacifiCorp could take interim  
21 measures that would free up transmission capacity and that there were a number of short term  
22 transmission products that PacifiCorp could offer that would allow more wind resources to come on  
23 line and would facilitate the delivery of existing wind resources.

24 Ms Shimshak pointed out that PacifiCorp is the largest emitter of global warming pollution  
25 in the Northwest, but that under its current ownership, it had emerged as an industry leader in  
26 identifying financial risks associated with CO<sub>2</sub> emissions. Ms. Shimshak said that MEHC had yet

1 to provide satisfactory assurances on global climate issues.

2 Ms. Shimshak, on behalf of RNP and NRDC, called upon the Applicants to:

3 1. Commit to meeting 10% of PacifiCorp’s load with new, nonhydro  
4 renewables within the next 10 years and 20% within twenty years. Make a stronger  
5 commitment to acquire renewables within the first year of the transaction or, at the very  
6 least, clarify when the 400 MWs will be acquired.

7 2. Agree to develop a stable rate Blue Sky green power product.

8 3. Revise Commitment 50 so that MEHC and PacifiCorp provide quarterly  
9 reports to the PUC about its renewables and transmission commitments.

10 4. Agree to launch a Conditional Firm pilot program within a year of the  
11 close of the transaction. Agree to evaluate flows on PacifiCorp’s transmission system  
12 and report on their utilization every other year.

13 5. Maintain support for Grid West and, in the absence of Grid West, other  
14 regional transmission planning and coordination efforts in the Northwest.

15 6. Provide a plan for ensuring real reductions in carbon dioxide emissions at  
16 PacifiCorp and indicate support for mandatory national limits on global warming  
17 pollution.

18 All seven of the areas that Ms. Shimshak addressed on behalf of RNP and NRDC addressed,  
19 and each of the six proposals they made, fell within the “Infrastructure and Resource Investments,  
20 including renewable resources and the commitment to renewable resources, transmission  
21 investment, energy efficiency and global climate leadership” issue that the ALJ had identified.

## 22 **II. MITIGATING MEASURES IN THE STIPULATION THAT ELIMINATE OR 23 REDUCE HARMS**

24 As noted above, the primary “harm” that Ms. Shimshak noted was the uncertainty whether  
25 PacifiCorp would continue, under the ownership of MEHC, to provide leadership on certain climate  
26 and other environmental issues that are important to its customers and the public generally. In  
addition, Ms. Shimshak identified seven areas in which Applicants needed to make additional  
commitments and give additional assurances in order to meet the statutory standard of serving “the  
public utility’s customers in the public interest.” ORS 757.511(3).

In some cases, the commitments made by Applicants are exactly what RNP and NRDC had  
sought. In other cases, consistent with the stipulation being a settlement, the commitments are

1 somewhat different from what RNP and NRDC had sought. That being said, the commitments that  
2 are somewhat different, nevertheless, address the very same areas of concern and do provide  
3 benefits such that RNP and NRDC, in the context of the larger stipulation reached by PUC Staff and  
4 other parties such as CUB, concluded that in so far as they were concerned, this transaction serves  
5 “the public utility’s customers in the public interest.” ORS 757.511(3).

6 **A. COMMITMENTS BY APPLICANTS**

7 **1. Renewable Resource Commitments**

8 In their original application and supplemental testimony, MEHC made what is now  
9 Commitment 40, reaffirming PacifiCorp’s commitment to acquire 1400 MW of new cost effective  
10 renewable resources, representing approximately 7% of PacifiCorp’s load, and to work to bring at  
11 least 100 MW of cost-effective wind resources in service within one year of the close of the  
12 transaction.

13 Applicants made a number of renewable resource-related commitments in the stipulation  
14 that go beyond Commitment 40, and which address the issues Ms. Shimshak raised in her testimony  
15 on behalf of RNP and NRDC.

16 In Commitment O25, Applicants commit to have 400 MW of cost effective new renewable  
17 resources in PacifiCorp’s generation portfolio by December 31, 2007. (The 100 MW commitment  
18 in Commitment 40 is part of the 400 MW commitment.) RNP worked more on obtaining this  
19 commitment more than any other. Despite the qualifiers, RNP and NRDC believe the commitment  
20 is valuable. Currently, the federal Production Tax Credit, which provides a provides an inflation-  
21 adjusted tax credit of 1.5¢/kWh for electricity generated from qualifying projects during the first 10  
22 years of operation, is set to expire at the end of December 31, 2007. RNP and NRDC considered it  
23 important to obtain a commitment from Applicants to acquire renewables in advance of the  
24 expiration so that renewable energy could be obtained for ratepayers at a lower net cost.

25 In Commitment O26, PacifiCorp commits to file a specific 10 year plan for achieving the  
26 1400 MW of renewable commitments it has made in its IRPs. This is another commitment RNP

1 worked hard to obtain.

2 In Commitment 52, Applicants commit to evaluate increasing generation at the Blundell  
3 geothermal facility—the incremental amount is expected to be 11 MW and perhaps as much as 100  
4 MW. This commitment provides the potential for new baseload renewable generation in  
5 PacifiCorp’s largest growing service territory. This was offered by Applicants and RNP and NRDC  
6 believe it has value.

7 **2. Transmission Related Commitments**

8 In their original application and supplemental testimony, Applicants made what is now  
9 Commitment 34, to use their best efforts to make the transmission system infrastructure  
10 improvements: Path C Upgrade; Mona-Oquirrh; Walla Walla-Yakima or Mid-Columbia.

11 Applicants made a number of transmission-related commitments in the stipulation that go  
12 beyond Commitment 34, and which address the issues Ms. Shimshak raised in her testimony on  
13 behalf of RNP and NRDC.

14 In Commitment 35(e), Applicants commit to support BPA’s development of short-term  
15 transmission products and to begin a process to design similar products for PacifiCorp. In  
16 Commitment 35(f), PacifiCorp commits to continue to offer its Partial Interim Service product, to  
17 make reasonable efforts to offer transmission customers as much firm service as studies show is  
18 available, and to continue its OATT tariff provisions. These commitments are related to short term  
19 transmission products, the availability of which is important for renewable energy—wind, in  
20 particular. RNP and NRDC directly addressed this issue in their testimony and worked on obtaining  
21 this commitment.

22 In Commitment 53, the Applicants also commit to study constructing a new transmission  
23 facility in Wyoming that has the potential of making important new wind resources available.

24 **3. Climate-Related Commitments**

25 In Commitment O31, Applicants commit to form an IGCC (“Integrated Gasification  
26 Combined Cycle”) Working Group, sponsored by PacifiCorp to discuss various policy and

1 technology issues associated with IGCC, carbon capture, and sequestration, and to seriously study  
2 an IGCC option. This is a modification of a commitment crafted in Utah. This commitment is  
3 related to reducing risks associated with climate change. RNP and NRDC believe it is a solid  
4 commitment to study this new technology

5 In Commitment 42 (b), Applicants commit to establish a global warming working group.  
6 As noted above, PacifiCorp, under its current ownership has been an industry leader with respect to  
7 these issues and this was an important commitment for RNP and NRDC.

#### 8 **4. Other Commitments**

9 In Commitment O19, Applicants commit to support the renewal of the 3% public purpose  
10 charge under ORS 757.612 beyond 2011 provided the Commission supports the renewal. CUB  
11 took the lead in seeking this commitment. As the Commission knows, the public purpose funding  
12 provides a critical component of funding for new cost-effective conservation, the above-market  
13 costs of new renewable energy resources, and new low-income weatherization. Again, RNP and  
14 NRDC believe this is another very important commitment.

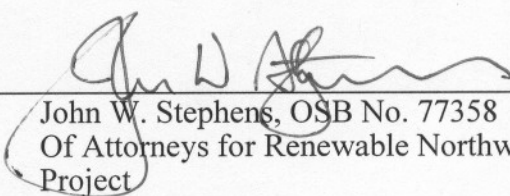
### 15 **III. MAGNITUDE OF THE BENEFITS AND ANY REMAINING HARMS, AND THE** 16 **BASIS FOR CONCLUDING THAT THE APPLICATION MEETS THE PUBLIC** 17 **INTEREST STANDARD SET OUT IN ORS 757.511**

18 RNP and NRDC did not undertake to address every issue or every harm or benefit that the  
19 proposed transaction potentially raised. The Commission's rule on petitions to intervene, OAR  
20 860-012-0001(1) requires petitioners to state the nature and extent of their interest in the proceeding  
21 and any special knowledge or expertise they have that would assist the Commission in resolving the  
22 issues in the proceeding. Consistent with that requirement and their petition, RNP and NRDC  
23 limited their testimony to those areas in which they had a particular interest and possessed special  
24 knowledge and expertise. Other parties, such as PUC Staff and CUB, have looked at broader issues.  
25 As noted above, as a consequence of the benefits associated with the stipulations on renewable  
26 resources, transmission, and global climate leadership, in the context of the larger stipulation  
reached by PUC Staff and other parties such as CUB, RNP and NRDC believe that this transaction

1 serves "the public utility's customers in the public interest," and that it should be approved by the  
2 Commission. ORS 757.511(3).

3 DATED this 6th day of February, 2006.

4 ESLER STEPHENS & BUCKLEY

5  
6 By:   
7 John W. Stephens, OSB No. 77358  
8 Of Attorneys for Renewable Northwest  
9 Project

10 \\W2k3-server\clients data\Maureen\RNP\UM 1209\RESPONSE TO BENCH REQUEST 2-6-0-6.doc

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **RESPONSE OF RENEWABLE NW PROJECT AND NRDC TO BENCH REQUEST** on the following persons on February 6, 2006, by e-mailing, hand-delivering, faxing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

Jim Abrahamson  
Oregon Energy Partnership/CADO  
4035 12<sup>th</sup> Street Cut-Off, Suite 110  
Salem, Oregon 97302  
[jim@cado-oregon.org](mailto:jim@cado-oregon.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Susan Anderson  
City of Portland  
Office of Sustainable Development  
721 N.W. 9<sup>th</sup> Avenue, Suite 350  
Portland, Oregon 97209-3447  
[susananderson@cl.portland.or.us](mailto:susananderson@cl.portland.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Douglas L. Anderson  
Senior Vice President/General Counsel  
MidAmerican Energy Holdings Co.  
302 S. 36 Street, Suite 400  
Omaha, Nebraska 68131  
[gerickson@midamercan.com](mailto:gerickson@midamercan.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Adam S. Arms  
McKanna Bishop Joffe & Sullivan, LLP  
1635 N.W. Johnson  
Portland, Oregon 97209  
[aarms@mbjlaw.com](mailto:aarms@mbjlaw.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Edward Bartell  
Klamath Off-Project Water Users, Inc.  
30474 Sprague River Road  
Sprague River, Oregon 97639

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail



Curtis G. Berkey  
Alexander Berkey et al.  
2000 Center Street, Suite 308  
Berkeley, California 94704  
[cberkey@abwvllaw.com](mailto:cberkey@abwvllaw.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Charlton H. Bonham  
Trout Unlimited  
828 San Pablo Avenue, Suite 208  
Albany, California 94706  
[cbonham@tu.org](mailto:cbonham@tu.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Maggie Brilz  
Manager, Rate Design  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707-0070  
[mbrilz@idahopower.com](mailto:mbrilz@idahopower.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Lowrey R. Brown  
Citizens' Utility Board of Oregon  
610 S.W. Broadway, Suite 308  
Portland, Oregon 97205  
[lowrey@oregoncub.org](mailto:lowrey@oregoncub.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Joanne M. Butler  
Legal Administrative Assistant  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707-0070  
[jbutler@idahopower.com](mailto:jbutler@idahopower.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

D. Kevin Carlson  
Department of Justice  
General Counsel Division  
1162 Court Street N.E.  
Salem, Oregon 97301-4096  
[d.carlson@doj.state.or.us](mailto:d.carlson@doj.state.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Philip H. Carver  
Oregon Department of Energy  
625 Marion Street N.E.  
Salem, Oregon 97301-3742  
[philip.h.carver@state.or.us](mailto:philip.h.carver@state.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Ralph Cavanagh  
Natural Resources Defense Council  
111 Sutter Street, Fl 20  
San Francisco, California 94104  
[rcavanagh@nrdc.org](mailto:rcavanagh@nrdc.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Bryan Conway  
P.O. Box 2148  
Salem, Oregon 97309-2148  
[bryan.conway@state.or.us](mailto:bryan.conway@state.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

John Corbett  
Yurok Tribe  
P.O. Box 1027  
Klamath, California 95548  
[jcorbett@yuroktribe.nsn.us](mailto:jcorbett@yuroktribe.nsn.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Joan Cote  
President  
Oregon Energy Coordinators Association  
2585 State Street N.E.  
Salem, Oregon 97301  
[cotej@mwwcaa.org](mailto:cotej@mwwcaa.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Christopher D. Crean  
Multnomah County  
501 S.E. Hawthorne, Suite 500  
Portland, Oregon 97214  
[christopher.d.crean@co.multnomah.or.us](mailto:christopher.d.crean@co.multnomah.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Melinda J. Davison  
Matthew W. Perkins  
Davison Van Cleve, PC  
333 S.W. Taylor, Suite 400  
Portland, Oregon 97204  
[mail@dvclaw.com](mailto:mail@dvclaw.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Robert Denham  
[robert.denham@mto.com](mailto:robert.denham@mto.com)  
Munger Tolles & Olsen, LLP  
355 South Grand Avenue, 35<sup>th</sup> Floor  
Los Angeles, California 90071

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Michael Early  
ICNU  
333 S.W. Taylor, Suite 400  
Portland, Oregon 97204  
[mearly@icnu.org](mailto:mearly@icnu.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Jason G. Eisdorfer  
Lowrey R. Brown  
Citizens' Utility Board of Oregon  
610 S.W. Broadway, Suite 308  
Portland, Oregon 97205  
[jason@oregoncub.org](mailto:jason@oregoncub.org)  
[lowrey@oregoncub.org](mailto:lowrey@oregoncub.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Ann L. Fisher  
AF Legal & Consulting Services  
2005 S.W. 71<sup>st</sup> Avenue  
Portland, Oregon 97225-3705  
[energlaw@aol.com](mailto:energlaw@aol.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Andrea Fogue  
League of Oregon Cities  
P.O. Box 928  
1201 Court Street N.E., Suite 200  
Salem, Oregon 97308  
[afogue@orcities.org](mailto:afogue@orcities.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

John R. Gale  
Vice President, Regulatory Affairs  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707-0070  
[rgale@idahopower.com](mailto:rgale@idahopower.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Bernardo R. Garcia  
Utility Workers Union of America  
215 Avendia Del Mar, Suite M  
San Clemente, California 92672  
[uwua@redhabanero.com](mailto:uwua@redhabanero.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Jessica A. Gorham  
Ater Wynne LLP  
222 S.W. Columbia, Suite 1800  
Portland, Oregon 97201-6618  
[jac@aterwynne.com](mailto:jac@aterwynne.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Ann English Gravatt  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ann@rnp.org](mailto:ann@rnp.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

David E. Hamilton  
Norris & Stevens  
621 S.W. Morrison, Suite 800  
Portland, Oregon 97205-3825  
[davidh@norrstev.com](mailto:davidh@norrstev.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Nancy Harper  
IBEW, Local 125  
17200 N.E. Sacramento  
Gresham, Oregon 97230  
[nancy@ibew125.com](mailto:nancy@ibew125.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Brian Johnson  
Trout Unlimited  
825 San Pablo Avenue, Suite 208  
Albany, California 94706  
[bjohnson@tu.org](mailto:bjohnson@tu.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Jason W. Jones  
**Confidential**  
Department of Justice  
Regulated Utility & Business Section  
1162 Court Street N.E.  
Salem, Oregon 97301-4096  
[jason.w.jones@state.or.us](mailto:jason.w.jones@state.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Andrea L. Kelly  
PacifiCorp  
825 N.E. Multnomah, Suite 800  
Portland, Oregon 97232  
[andrea.kelly@pacificorp.com](mailto:andrea.kelly@pacificorp.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Barton L. Kline  
Senior Attorney  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707-0070  
[bkline@idahopower.com](mailto:bkline@idahopower.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Kaitlin Lovell  
Trout Unlimited  
213 S.W. Ash, Suite 205  
Portland, Oregon 97204  
[klovell@tu.org](mailto:klovell@tu.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Katherine A. McDowell, Esq.  
Stoel Rives, LLP  
900 S.W. Fifth Avenue, Suite 1600  
Portland, Oregon 97204-1268  
[kamcdowell@stoel.com](mailto:kamcdowell@stoel.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Daniel W. Meek  
Daniel W. Meek Attorney at Law  
10949 S.W. Fourth Avenue  
Portland, Oregon 97219  
[dan@meek.net](mailto:dan@meek.net)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

William Miller  
IBEW, Local 125  
17200 N.E. Sacramento  
Gresham, Oregon 97230  
[bill@ibew125.com](mailto:bill@ibew125.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Mark C. Moench  
Senior Vice President—Law  
MidAmerican Energy Holdings Co.  
201 South Main Street, Suite 2300  
Salt Lake City, Utah 84111  
[mcmoench@midamerican.com](mailto:mcmoench@midamerican.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Christy Monson  
League of Oregon Cities  
1201 Court Street N.E., Suite 200  
Salem, Oregon 97301  
[cmonson@orcities.org](mailto:cmonson@orcities.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Barbara Lee Norman  
Attorney for the Karuk Tribe  
P.O. Box 657  
Yreka, California 96097  
[bnorman@karuk.us](mailto:bnorman@karuk.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

NW Energy Coalition  
219 First Street, Suite 100  
Seattle, Washington 98104  
[steve@nwenergy.org](mailto:steve@nwenergy.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Michael W. Orcutt  
Hoopa Valley Tribe Fisheries Dept.  
P.O. Box 417  
Hoopa, California 95546  
[director@pcweb.net](mailto:director@pcweb.net)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Matthew W. Perkins  
Davison Van Cleve PC  
333 S.W. Taylor, Suite 400  
Portland, Oregon 97204  
[mwp@dvclaw.com](mailto:mwp@dvclaw.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Janet Prewitt  
Department of Justice  
1162 Court Street N.E.  
Salem, Oregon 97301-4096  
[janet.prewitt@doj.state.or.us](mailto:janet.prewitt@doj.state.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Lisa F. Rackner  
Jessica A. Gorham  
Ater Wynne, LLP  
222 S.W. Columbia, Suite 1800  
Portland, Oregon 97201-6618  
[lfr@aterwynne.com](mailto:lfr@aterwynne.com)  
[jac@aterwynne.com](mailto:jac@aterwynne.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Rates & Regulatory Affairs  
Portland General Electric Company  
121 S.W. Salmon Street, 1WTC0702  
Portland, Oregon 97204  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Peter J. Richardson  
Richardson & O'Leary  
515 N. 27<sup>th</sup> Street  
P.O. Box 7218  
Boise, Idaho 83702  
[peter@richardsonandoleary.com](mailto:peter@richardsonandoleary.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Steve Rothert  
American Rivers  
409 Spring Street, Suite D  
Nevada City, California 95959  
[srothert@americanrivers.org](mailto:srothert@americanrivers.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Gregory W. Said  
Director of Revenue Requirement  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707-0070  
[gsaid@idahopower.com](mailto:gsaid@idahopower.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Thomas P. Schlosser  
Morisset Schlosser Jozwiak & McGaw  
801 Second Avenue Suite 1115  
Seattle, Washington 98104-1509  
[t.schlosser@msaj.com](mailto:t.schlosser@msaj.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Rob Roy Smith  
Morisset Schlosser Jozwiak & McGaw  
1115 Norton Building  
801 Second Avenue  
Seattle, Washington 98104-1509  
[r.smith@msaj.com](mailto:r.smith@msaj.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Thane Somerville  
Morisset Schlosser Jozwiak & McGaw  
1115 Norton Building  
801 Second Avenue  
Seattle, Washington 98104-1509  
[t.somerville@msaj.com](mailto:t.somerville@msaj.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Glen H. Spain  
Northwest Regional Director  
Pacific Coast Fed of Fishermen's Associations  
P.O. Box 11170  
Eugene, Oregon 97440-3370  
[fish1ifr@aol.com](mailto:fish1ifr@aol.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail



Mark Thompson  
Public Power Council  
1500 N.E. Irvin Street, Suite 200  
Portland, Oregon 97232  
[mthompson@ppcpdx.org](mailto:mthompson@ppcpdx.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Douglas C. Tingey  
Portland General Electric  
121 S.W. Salmon Street 1WTC1301  
Portland, Oregon 97204  
[jay\\_dudley@pgn.com](mailto:jay_dudley@pgn.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Sandi R. Tripp  
Director  
Karuk Tribe Dept. of Natural Resources  
P.O. Box 1016  
Happy Camp, California 95546  
[stripp@karuk.us](mailto:stripp@karuk.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Utility Workers of America  
P.O. Box 37  
San Clemente, California 92674-0037  
[uwua@redhabanero.com](mailto:uwua@redhabanero.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Benjamin Walters  
City of Portland  
Office of City Attorney  
1221 S.W. Fourth Avenue, Suite 430  
Portland, Oregon 9204  
[bwalters@ci.portland.or.us](mailto:bwalters@ci.portland.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Michael T. Weirich  
Department of Justice  
Regulated Utility & Business Section  
1162 Court Street N.E.  
Salem, Oregon 97301-4096  
[michael.weirich@state.or.us](mailto:michael.weirich@state.or.us)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Steven Weiss  
Northwest Energy Coalition  
4422 Oregon Trail Court N.E.  
Salem, Oregon 97305  
[steve@nwenergy.org](mailto:steve@nwenergy.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Linda K. Williams  
Kafoury & McDougal  
10266 S.W. Lancaster Road  
Portland, Oregon 97219-6305  
[linda@lindawilliams.net](mailto:linda@lindawilliams.net)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail


Paul Woodin  
Western Wind Power  
282 Largent Lane  
Goldendale, Washington 98620  
[pwoodin@gorge.net](mailto:pwoodin@gorge.net)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

DATED this 6<sup>th</sup> day of February, 2006.

ESLER STEPHENS & BUCKLEY

By: \_\_\_\_\_

  
John W. Stephens, OSB No. 77358  
Of Attorneys for Renewable Northwest  
Project