

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

3 UM 1681

4 In the Matter of

5 PACIFICORP, dba PACIFIC POWER's  
6 2015-2019 Renewable Portfolio Standard  
7 Implementation Plan

MOTION TO WAIVE OAR 860-001-0350(7)(a)  
EXPEDITED CONSIDERATION REQUESTED

8 The Public Utility Commission of Oregon Staff (Staff), PacifiCorp d/b/a Pacific Power  
9 (PacifiCorp or Company), the Oregon Department of Energy (ODOE), the Citizens' Utility  
10 Board (CUB), Renewables Northwest (RNW), and the Industrial Customers of Northwest  
11 Utilities (ICNU) (collectively, the Parties and individually a Party) file this motion under OAR  
12 860-001-0000(2) for waiver of the requirement contained in OAR 860-001-0350(7)(a) to file an  
13 explanatory brief or supporting testimony with a settlement agreement.

14 PacifiCorp filed its 2015-2019 Renewable Portfolio Standard Implementation Plan (the  
15 2015-2019 RPIP) on December 26, 2013 and on February 18, 2014 the Company filed an  
16 updated 2015-2019 RPIP containing a non-confidential summary of the Company's incremental  
17 cost of RPS compliance. All Parties reviewed the Company's 2015-2019 RPIP and all Parties  
18 agree that the 2015-2019 RPIP shows PacifiCorp is positioned to be in compliance with  
19 Oregon's renewable portfolio standard (RPS) requirements contained in ORS 469A.052.

20 The Parties have reached a settlement in which all Parties except ICNU support  
21 acknowledgment of the 2015-2019 RPIP; ICNU does not oppose acknowledgment of the 2015-  
22 2019 RPIP. OAR 860-001-0350(7) directs parties to a settlement to file, concurrent with the  
23 written stipulation, an explanatory brief or written testimony. In this case, no Party has raised  
24 any issue with the accuracy or substance of the 2015-2019 RPIP. The only issues resolved by  
25 settlement are that the 2015-2019 RPIP is compliant and relate to conditions imposed on  
26 PacifiCorp with regard to future renewable portfolio standard implementation plans (RPIP).

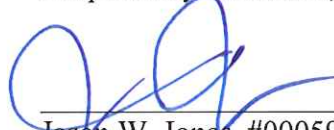
1 These conditions are set forth in the stipulation and require PacifiCorp to include a non-  
2 confidential summary of renewable portfolio standard total incremental costs for each scenario  
3 analyzed in future RPIPs and to analyze a scenario in future RPIPs that assumes maximum use of  
4 unbundled renewable energy credits.

5 Given that the stipulation speaks for itself in this instance, the Parties respectfully request  
6 the Commission grant this waiver of the Commissions' rule requiring the concurrent filing of an  
7 explanatory brief or written testimony in support of the stipulation. The stipulation sets forth a  
8 summary of the Company's 2015-2019 RPIP and an explanation of the additional conditions for  
9 future RPIPs requested by Staff and ICNU. Given the non-controversial nature of the 2015-2019  
10 RPIP and straight-forward conditions requested for future RPIPs, the Commission has adequate  
11 information to approve the stipulation and acknowledge the Company's 2015-2019 RPIP without  
12 the need for an explanatory brief or written testimony in support of the stipulation.

13 For these reasons, the Parties respectfully request that the Commission waive the  
14 requirements of OAR 860-001-0350(7) and allow the Parties to file the stipulation settling  
15 docket UM 1681 without an explanatory brief or written testimony. Given the short time period  
16 between the filing of the stipulation and Commission resolution of the 2015-2019 RPIP, the  
17 Parties request expedited consideration of this motion.

18 DATED this 13<sup>th</sup> day of June 2014.

19 Respectfully submitted,

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21 \_\_\_\_\_  
22 Jason W. Jones, #00059  
23 Assistant Attorney General  
24 Of Attorneys for Staff of the Public Utility  
25 Commission of Oregon  
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1 **CERTIFICATE OF SERVICE**

2 I certify that on June 13, 2014, I served the foregoing Motion upon all parties of record in  
3 this proceeding by delivering a copy by electronic mail only as all parties waive paper service.

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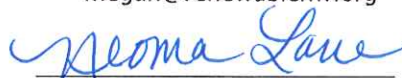
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