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August 14, 2014

## VIA ELECTRONIC AND U.S. MAIL

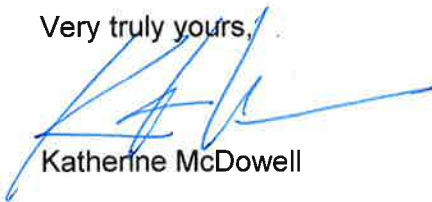
PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 1088  
Salem, OR 97308-1088

**Re: UE 287– In the Matter PACIFICORP, dba PACIFIC POWER, 2015 Transition  
Adjustment Mechanism and UM 1689 – Application for Deferred Accounting and  
Prudence Determination Associated with the Energy Imbalance Market**

Attention Filing Center:

On behalf of PacifiCorp, Public Utility Commission of Oregon Staff, the Citizens' Utility Board of Oregon, and the Industrial Customers of Northwest Utilities, enclosed for filing in the captioned dockets are an original and five copies of the Joint Testimony in Support of Stipulation. A copy of this filing was served on all parties to these proceedings as indicated on the attached Certificate of Service.

Very truly yours,



Katherine McDowell

cc: Service List

Docket Nos. UE 287 & UM 1689  
Exhibit Settling Parties/100  
Witnesses: Dickman, Ordonez, Garcia, Jenks, & Mullins

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF THE STATE OF OREGON**

SETTLING PARTIES: PACIFICORP, D/B/A PACIFIC POWER, PUBLIC UTILITY  
COMMISSION OF OREGON STAFF, THE CITIZENS' UTILITY BOARD OF  
OREGON, AND THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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Joint Testimony of Brian S. Dickman, Jorge Ordonez, Deborah Garcia, Bob Jenks, and  
Bradley G. Mullins

August 2014



1 **Q. Has any party to dockets UE 287 or UM 1689 objected to the Stipulation?**

2 A. No.

3 **BACKGROUND ON DOCKET UE 287**

4 **Q. Please describe how docket UE 287 began.**

5 A. On April 1, 2014, PacifiCorp filed its 2015 transition adjustment mechanism  
6 (TAM), including revised tariff sheets for Schedules 201 and 205. The  
7 Company's 2015 TAM updates net power costs (NPC) for 2015 and sets the  
8 transition adjustments for customers electing direct access during the November  
9 2014 open enrollment period. The Public Utility Commission of Oregon  
10 (Commission) opened docket UE 287 to review the filing.

11 **Q. What did the Company include in its April 1, 2014 TAM filing (Initial  
12 Filing)?**

13 A. The Company's Initial Filing reflects total-company NPC of approximately  
14 \$1.530 billion, or \$378.3 million on an Oregon-allocated basis, for an overall  
15 average rate increase of approximately 1.5 percent. This amount is approximately  
16 \$17.1 million higher than the \$361.1 million included in rates in the 2014 TAM  
17 (docket UE 264), and \$18.3 million higher when adjusted for forecasted load loss  
18 and Other Revenues.

19 **Q. Did the Company provide additional information to parties about the TAM  
20 Initial Filing before settlement discussions began in Docket UE 287?**

21 A. Yes. On May 29, 2014, the Company provided a list of corrections and known  
22 updates. The impact of these corrections and updates was an increase in NPC of

1           \$0.9 million on a total-company basis, or approximately \$200,000 on an Oregon-  
2           allocated basis.

3   **Q.    Did Staff and other parties conduct discovery on the Company's 2015 TAM**  
4   **filing?**

5   A.    Yes. Four parties, Staff, CUB, ICNU and Noble Americas Energy Solutions  
6           LLC (Noble Solutions), filed a total of nine sets of data requests in this case,  
7           containing 99 separate requests.

8   **Q.    Did the parties convene an initial settlement conference on June 10, 2014, in**  
9   **Docket UE 287?**

10 A.    Yes. This conference resulted in an informal agreement among the Settling  
11           Parties and Noble Solutions to model Naughton Unit 3 as a coal-fired plant in  
12           the TAM July Update (instead of reflecting the generating unit's conversion to  
13           natural gas in 2015), reducing total-company NPC by approximately  
14           \$32.0 million and Oregon-allocated NPC by approximately \$7.9 million.

15 **Q.    How was this informal agreement memorialized in the record in docket**  
16 **UE 287?**

17 A.    On June 18, 2014, PacifiCorp submitted a letter to Administrative Law Judge  
18           Pines that outlined the parties' informal agreement on the modeling of Naughton  
19           Unit 3.

20 **Q.    Did Staff and other parties file testimony in docket UE 287?**

21 A.    Yes. On June 19, 2014, Staff and ICNU filed testimony in docket UE 287. CUB  
22           and Noble Solutions did not file testimony, but filed statements reserving their  
23           right to continue to participate in the case.

1 **Q. Did Staff propose adjustments to the 2015 TAM?**

2 A. No. Staff indicated that the informal resolution of the modeling of Naughton  
3 Unit 3 resolved its primary issue in the case.

4 **Q. Did ICNU propose adjustments to the 2015 TAM?**

5 A. Yes. ICNU recommended several adjustments to NPC, the largest of which  
6 related to the inclusion of Energy Imbalance Market (EIM) benefits in the 2015  
7 TAM. ICNU's recommendations also included an adjustment based on a new  
8 standard for including Qualifying Facility (QF) contracts in the TAM, modifying  
9 the TAM Guideline's attestation requirements for the Indicative Update.

10 **BACKGROUND ON DOCKET UM 1689**

11 **Q. Please describe how docket UM 1689 began.**

12 A. On April 18, 2014, the Company filed an Application for Deferred Accounting  
13 and Prudence Determination Associated with the Energy Imbalance Market,  
14 together with testimony and exhibits supporting the application (EIM  
15 Application). The Commission opened docket UM 1689 to review the EIM  
16 Application.

17 **Q. What are the major elements of the EIM Application?**

18 A. In the EIM Application, PacifiCorp:  
19 (a) Sought approval to defer EIM start-up costs, including \$16 million in capital  
20 costs on a total-company basis (approximately \$4 million Oregon allocated)  
21 and approximately \$4 million in operations and maintenance (O&M) costs  
22 on a total-company basis (approximately \$1 million Oregon allocated);

1 (b) Sought approval to defer annual O&M costs of approximately \$1.7 million  
2 total company, or approximately \$425,000 on an Oregon-allocated basis,  
3 until these costs are reflected in base rates;

4 (c) Requested a Commission determination that the Company's decision to  
5 participate in the EIM was prudent; and

6 (d) Proposed a collaborative process for developing a balancing account or  
7 other method for reflecting on-going EIM-related variable costs and benefits  
8 in rates.

9 **Q. Did the Commission convene a workshop to review the EIM Application?**

10 A. Yes. On May 28, 2014, the Commissioners met with representatives from  
11 PacifiCorp and other parties to review the status of the EIM and the details of the  
12 EIM Application.

13 **Q. Did Staff and other parties conduct discovery on the EIM Application?**

14 A. Yes. Three parties (Staff, CUB, and ICNU) filed a total of five sets of data  
15 requests in this case, containing 36 separate requests.

16 **Q. Did Staff and other parties file testimony in the EIM Application?**

17 A. Yes. On June 23, 2014, Staff, CUB, and ICNU filed testimony in the EIM  
18 Application. Each party opposed or sought modifications to certain aspects of the  
19 EIM Application.

20 **JOINT SETTLEMENT PROCESS IN DOCKETS UE 287 AND UM 1689**

21 **Q. Did the parties to dockets UE 287 and UM 1689 decide to consolidate**  
22 **settlement discussions in the cases?**

1 A. Yes. The parties convened joint settlement conferences in dockets UE 287 and  
2 UM 1689 on July 9, 2014, and July 14, 2014. The Stipulation resulted from the  
3 negotiations at these conferences.

4 **Q. Did the Settling Parties agree that PacifiCorp would file its July Update in**  
5 **the TAM concurrently with the Stipulation in dockets UE 287 and UM 1689?**

6 A. Yes. PacifiCorp filed the Stipulation and the July Update to the TAM on July 31,  
7 2014.

8 **KEY PROVISIONS OF THE STIPULATION**

9 **Q. What is the Settling Parties' agreement in docket UE 287 on the Company's**  
10 **2015 NPC?**

11 A. The Settling Parties agree to establish a total-company baseline for 2015 NPC of  
12 \$1.496 billion, or \$370.0 million on an Oregon-allocated basis, subject to the July  
13 Update, November Indicative Update, and Final Update.

14 **Q. Please describe the adjustments to NPC included in the Stipulation.**

15 A. The Settling Parties describe these adjustments in Exhibit A to the Stipulation as  
16 follows:

- 17 • Modeling Naughton Unit 3 as a coal-fired unit in 2015—\$32.0 million  
18 reduction on a total-company basis, or \$7.9 million on an Oregon-allocated  
19 basis.
- 20 • Costs of EIM participation—\$6.7 million increase on a total-company basis,  
21 or approximately \$1.7 million on an Oregon-allocated basis.
- 22 • Benefits of EIM participation—\$6.7 million reduction on a total-company  
23 basis, or approximately \$1.7 million on an Oregon-allocated basis.



- 1           • One-time “black box” adjustment for other issues raised in testimony—\$1.3  
2           million reduction on a total company basis, or approximately \$344,000 on an  
3           Oregon-allocated basis.

4   **Q.    What is the value of the reduction to Oregon NPC in the Stipulation**  
5   **compared to the Company’s proposed TAM increase?**

6   A.    The stipulated reduction to Oregon NPC compared to the Company’s proposed  
7   TAM increase is approximately \$8.3 million, resulting in a revised TAM increase  
8   of \$10.1 million, including the load change and Other Revenues adjustments  
9   shown in Exhibit A to the Stipulation.

10 **Q.    What is the rate impact of the stipulated 2015 TAM increase?**

11 A.    As set forth in Exhibit B to the Stipulation, the overall average rate increase is  
12   approximately 0.8 percent. In accordance with the stipulation in docket UE 263,  
13   approved by Order No. 13-474, the Settling Parties use the functionalized revenue  
14   requirement allocation factors from UE 263 to develop rates for the 2015 TAM  
15   increase.

16 **Q.    Does the July Update in the TAM reflect the agreed-upon reduction to**  
17 **Oregon NPC?**

18 A.    Yes.

19 **Q.    What is the impact of the July Update on the stipulated NPC baseline?**

20 A.    The July Update produces only a slight change to the 2015 NPC baseline in the  
21   stipulation: \$1.497 billion in NPC on a total-company basis, and \$369.7 million  
22   on an Oregon-allocated basis. After accounting for a correction to Other

1 Revenues, the TAM July Update reflects an overall rate increase of \$9.8 million,  
2 which is a reduction of \$8.5 million from the Company's Initial Filing.

3 **Q. Will there be additional updates to NPC?**

4 A. Yes. Consistent with both the procedural schedule adopted in docket UE 287 and  
5 the TAM Guidelines, the Company will file its November Indicative Update on  
6 November 10, 2014, and will file its Final Update on November 17, 2014.

7 **Q. Did the Settling Parties reserve their rights to challenge the July, Indicative,  
8 and Final Updates in the TAM?**

9 A. Yes. The Settling Parties reserve their rights to challenge all TAM Updates, but  
10 agree not to challenge any issues from the Company's Initial Filing and EIM  
11 Application resolved by the Stipulation. The Settling Parties also agree that the  
12 Stipulation does not limit the issues any Settling Party may raise in future  
13 proceedings, except as expressly provided in the Stipulation.

14 **Q. Please explain the treatment of EIM costs and benefits in the Stipulation.**

15 A. The Settling Parties agree that, at this time, the costs and benefits associated with  
16 the EIM are difficult to predict with certainty. As an interim approach, the  
17 Settling Parties agree that it is reasonable to offset EIM costs and benefits in 2015  
18 NPC. The agreement in the Stipulation resolves the issue of EIM costs and  
19 benefits only through December 31, 2015.

20 **Q. How will the Company address costs and benefits of the EIM after December  
21 31, 2015?**

22 A. The Company agrees to address EIM-related costs and benefits after December  
23 31, 2015, in the 2016 TAM. The Company will participate in one or more

1 workshops with Staff and other interested parties to discuss the operation of the  
2 EIM, the methodology for calculating EIM-related benefits, and potential options  
3 for addressing EIM-related costs and benefits from January 1, 2016, forward.

4 **Q. Do the Settling Parties agree to the prudence of the Company's decision to**  
5 **participate in the EIM?**

6 A. Yes. The Settling Parties agree that PacifiCorp's decision to participate in the  
7 EIM was prudent. The Settling Parties agree that, for purposes of the Stipulation,  
8 PacifiCorp made this decision on April 30, 2013, the date on which PacifiCorp  
9 signed the EIM Implementation Agreement with the California Independent  
10 System Operator.<sup>1</sup>

11 **Q. Do the Settling Parties limit their agreement with respect the prudence of the**  
12 **EIM?**

13 A. Yes. The Settling Parties reserve the right to contest the prudence of PacifiCorp's  
14 continued participation in the EIM and the associated costs in future proceedings.

15 **Q. Please describe how the Stipulation addresses start-up O&M expenses for the**  
16 **EIM.**

17 A. The Settling Parties agree that the start-up O&M expenses from the date of the  
18 EIM Application, April 18, 2014, through December 31, 2014, will be recorded as  
19 a regulatory asset.

20 **Q. How does the Stipulation address the amount of start-up O&M costs?**

21 A. The Company currently estimates that start-up O&M expenses will be  
22 approximately \$2.7 million total-company, or approximately \$700,000 on an

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<sup>1</sup> PacifiCorp filed a copy of the Implementation Agreement as Exhibit PAC/102 to the Testimony of Stefan A. Bird in support of the EIM Application.

1 Oregon-allocated basis. The Settling Parties agree to use this estimate as a cap;  
2 the regulatory asset will be based on actual costs incurred from April 18, 2014, to  
3 December 31, 2014, but may not exceed \$2.7 million on a total-company basis.

4 **Q. Does the Stipulation address ratemaking treatment of the proposed**  
5 **regulatory asset?**

6 A. No, the Stipulation does not address the prudence or ratemaking treatment of the  
7 start-up O&M costs associated with the regulatory asset. PacifiCorp agrees that it  
8 will address the ratemaking treatment of the regulatory asset in its next general  
9 rate case.

10 **Q. Does treatment of start-up O&M expenses as a regulatory asset rather than**  
11 **recording expenses through deferred accounting require additional action by**  
12 **the Commission?**

13 A. Yes. As part of the order approving the Stipulation in dockets UE 287 and  
14 UM 1689, the Settling Parties request that the Commission issue an accounting  
15 order authorizing the Company to record start-up O&M expenses for the EIM as a  
16 regulatory asset. The agreement in the Stipulation to treat the expenses as a  
17 regulatory asset is supported by the record in the Company's EIM Application,  
18 and supersedes the Company's request for deferred accounting in the EIM  
19 Application.

20 **Q. Please explain the provisions of the Stipulation regarding attestation for QF**  
21 **contracts.**

22 A. In its testimony in docket UE 287, ICNU argued that certain QF contracts might  
23 be included in the TAM that will not achieve commercial operation during the

1 rate effective period. As a compromise, the Settling Parties agree to include a  
2 new provision in PacifiCorp's attestation included with the November Indicative  
3 Update in this and future TAM proceedings. For new QFs with executed power  
4 purchase agreements that are included in the TAM but are not yet operational,  
5 PacifiCorp will confirm that it has a commercially reasonable good faith belief  
6 that the new QFs will reach commercial operation during the rate effective period.  
7 PacifiCorp's attestation will be based on the information known to it as of the  
8 contract lockdown date, but does not require PacifiCorp to opine regarding the  
9 commercial viability of any QF.

10 **Q. If the Commission approves the Stipulation, will the Company file revised**  
11 **tariff sheets?**

12 A. Yes. The Company will file revised tariff sheets for Schedules 201, 294, and 295  
13 as a compliance filing in docket UE 287, consistent with the underlying schedule  
14 in docket UE 287. The revised tariff sheets will reflect the adjustments agreed  
15 upon in the Stipulation and will reflect the TAM Final Update. PacifiCorp will  
16 also file a revised Schedule 205 to incorporate the changes to Other Revenues  
17 included in the July Update.

18 **Q. What is the proposed effective date of the revised tariff sheets?**

19 A. The revised tariff sheets will be effective January 1, 2015.

20 **Q. If the Commission rejects any part of the Stipulation, are the Settling Parties**  
21 **entitled to reconsider their participation in the Stipulation?**

22 A. Yes. The Settling Parties have negotiated the Stipulation as an integrated  
23 document, and if the Commission rejects all or any material portion of the

1 Stipulation or imposes additional material conditions on the Stipulation, any of  
2 the Settling Parties are entitled to withdraw from the Stipulation.

3 **REASONABLENESS OF THE STIPULATION**

4 **Q. What is the basis for the Stipulation?**

5 A. The Company's initial filings in dockets UE 287 and UM 1689, and the reply  
6 testimonies of Staff and intervenors, create an extensive record on the Company's  
7 2015 NPC and its decision to participate in the EIM. The Company responded to  
8 multiple sets of data requests and provided updates and corrections to its Initial  
9 Filing in the TAM. The parties met for several settlement conferences and  
10 resolved their differences through dialogue and negotiations.

11 **Q. Please explain why the Settling Parties believe that the Commission should**  
12 **adopt the Stipulation in dockets UE 287 and UM 1689.**

13 A. The Stipulation represents a reasonable compromise for many reasons, including  
14 the following: (1) the Stipulation results in an average rate increase of less than  
15 one percent for the 2015 TAM; (2) the agreement to model Naughton Unit 3 as a  
16 coal resource in 2015 reflects the best information known to the Company at this  
17 time; (3) offsetting the costs and benefits associated with the EIM appropriately  
18 balances possible risks and benefits during the first full year of the EIM's  
19 operation; (4) the stipulation resolves the initial prudence and interim ratemaking  
20 issues associated with the Company's decision to participate in the EIM and sets  
21 up a framework for resolving EIM ratemaking issues on a more permanent basis;  
22 (5) the "black box" adjustment avoids litigation on the remaining issues; and (6)

1           the Stipulation provides additional assurance that QF contracts included in the  
2           TAM will provide service in the rate effective period.

3   **Q.    Have the Settling Parties evaluated the overall fairness of the Stipulation?**

4   A.    Yes. Each Settling Party has reviewed the Company's filings in dockets UE 287  
5           and UM 1689 and the Stipulation. The Settling Parties agree that the rates  
6           resulting from the Stipulation meet the standard set forth in ORS 756.040 and  
7           represent a reasonable compromise of the issues presented in this case.

8   **Q.    What do the Settling Parties recommend regarding the Stipulation?**

9   A.    The Settling Parties recommend that the Commission adopt the Stipulation as the  
10          basis for resolving the issues in dockets UE 287 and UM 1689, and request that  
11          the Commission include the terms and conditions of the Stipulation in its final  
12          orders in these cases.

13   **Q.    Does this conclude your Joint Testimony?**

14   A.    Yes.

Docket Nos. UE 287 & UM 1689  
Exhibit Settling Parties/101  
Witnesses: Dickman, Ordonez, Garcia, Jenks, & Mullins

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF THE STATE OF OREGON**

SETTLING PARTIES: PACIFICORP, D/B/A PACIFIC POWER, PUBLIC UTILITY  
COMMISSION OF OREGON STAFF, THE CITIZENS' UTILITY BOARD OF  
OREGON, AND THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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Exhibit Accompanying Joint Testimony of Brian S. Dickman, Jorge Ordonez, Deborah  
Garcia, Bob Jenks, and Bradley G. Mullins

Witness Qualifications

August 2014



## WITNESS QUALIFICATION STATEMENT

**NAME:** Bob Jenks

**EMPLOYER:** Citizens' Utility Board of Oregon

**TITLE:** Executive Director

**ADDRESS:** 610 SW Broadway, Suite 400  
Portland, OR 97205

**EDUCATION:** Bachelor of Science, Economics  
Willamette University, Salem, OR

**EXPERIENCE:** Provided testimony or comments in a variety of OPUC dockets, including:

UE 88, UE 92, UM 903, UM 918, UE 102, UP 168, UT 125, UT 141, UE 172, UE 173, UE 207, UE 208, UE 210, UG 152, UM 995, UM 1050, UM 1071, UM 1147, UM 1121, UM 1206, UM 1209, UM 1355, UM 1635, UE 233, UE 246, UM 1633, and UM 1654. Participated in the development of a variety of Least Cost Plans and PUC Settlement Conferences. Provided testimony to Oregon Legislative Committees on consumer issues relating to energy and telecommunications. Lobbied the Oregon Congressional delegation on behalf of CUB and the National Association of State Utility Consumer Advocates. Between 1982 and 1991, worked for the Oregon State Public Interest Research Group, the Massachusetts Public Interest Research Group, and the Fund for Public Interest Research on a variety of public policy issues.

**MEMBERSHIP:** National Association of State Utility Consumer Advocates  
Board of Directors, OSPIRG Citizen Lobby  
Telecommunications Policy Committee, Consumer Federation of America  
Electricity Policy Committee, Consumer Federation of America  
Board of Directors (Public Interest Representative), NEEA

## CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UE 287 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below:

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Dated this 14<sup>th</sup> of August 2014.

  
Wendy McIndoo  
Office Manager

## CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1689 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below:

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Dated this 14<sup>th</sup> of August 2014.

  
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