

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

3 UE 296

4 In the Matter of
5 PACIFICORP, dba PACIFIC POWER,
6 2016 Transition Adjustment Mechanism
7
8

**STAFF'S PREHEARING
MEMORANDUM**

9 In accordance with the schedule set in this matter, Staff of the Public Utility Commission
10 of Oregon (Staff) submits its Prehearing Memorandum. Staff's understanding of the purpose of
11 the prehearing memorandum is intended to inform the Administrative Law Judge (ALJ) of the
12 status of Staff's issues so that the ALJ can prepare accordingly for the hearing. As such, Staff
13 will not submit argument in support of its issues at this time.

14 In brief summary, the following are the existing issues that Staff is actively pursuing with
15 PacifiCorp's 2016 Transition Adjustment Mechanism (TAM) filing:

16 (1) Modeling of the transmission transfer capability between PacifiCorp's east and
17 west "balancing authority areas" (referred to as BAAs Nexus Modeling). *See* Staff/100,
18 Ordonez/2, 8-11; Staff/200, Ordonez/2, 5-10 (as corrected by errata sheets filed August
12); and

19 (2) Modeling change regarding day-ahead and real-time balancing transactions
20 (referred to as Day-Ahead and Real-Time Modeling). *See* Staff/100, Ordonez/2, 17-24;
Staff/200, Ordonez/1, 2-3, 11-15.

21 Further, in its Cross-Answering Testimony, in an effort to be helpful to the parties and to
22 the ALJ, Staff took the opportunity to weigh-in on issues raised by the Industrial Customers of
23 Northwest Utilities (ICNU), Noble Solutions (Noble) and by the Citizens' Utility Board (CUB)
24 in their respective Opening Testimonies (collectively, the Intervenors). *See generally* Staff/200,
25 Ordonez/1- 5; 15-28. With one exception, Staff stands by the positions set forth in its Cross-
26 Answering Testimony on the Intervenors' issues. As to the exception, based upon PacifiCorp's

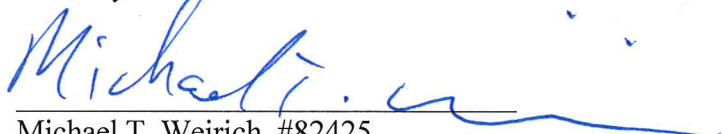
1 Reply Testimony, Staff withdraws its support for Noble's "freed-up RECs" issue. See Staff/200,
2 Ordonez/25-26.

3 Finally, while Staff offered its opinion in its Cross-Answering Testimony upon the
4 various issues raised by the Intervenors, Staff does not intend to actively pursue these issues
5 should an evidentiary hearing be held in this proceeding. In other words, with the one exception
6 for "freed up RECs," Staff will continue to support its position taken in its Cross-Answering
7 Testimony on various Intervenor issues in post-hearing briefing. However, Staff does not intend
8 to present further testimony on the Intervenor issues at the hearing nor does Staff intend to cross
9 examine witnesses on these issues.

10 DATED this 17th day of August, 2015.

11 Respectfully submitted,

12 ELLEN F. ROSENBLUM
13 Attorney General

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15 Michael T. Weirich, #82425
16 Assistant Attorney General
17 Of Attorneys for Staff of the Public Utility
18 Commission of Oregon