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November 30, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 1794—PacifiCorp's Response to Motion for Clarification of Scope of Proceeding and Opposition to Motion to Suspend Schedule

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Response to Motion for Clarification of Scope of Proceeding and Opposition to Motion to Suspend Schedule.

If you have questions about this filing, please contact Natasha Siores at (503) 813-6583.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1794

In the Matter of:

PACIFICORP d/b/a PACIFIC POWER

Investigation into Schedule37 – Avoided
Cost Purchases from Qualifying Facilities of
10,000 kW or Less.

**PACIFICORP’S RESPONSE TO
MOTION FOR CLARIFICATION OF
SCOPE OF PROCEEDING AND
OPPOSITION TO MOTION TO
SUSPEND SCHEDULE**

I. INTRODUCTION

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully requests that the Administrative Law Judge (ALJ) deny the Motion for Clarification of Scope of Proceeding (Motion for Clarification) filed on November 23, 2016, by the Community Renewable Energy Association (CREA) and the Renewable Energy Coalition (REC) (collectively, the Joint QFs). PacifiCorp also respectfully requests that the ALJ deny the Motion to Suspend Schedule filed on November 28, 2016, by the Joint QFs. PacifiCorp requests that the ALJ affirm the limited scope of this expedited proceeding and make clear that: (1) issues related to the Company’s 2016 renewable Request for Proposals (RFP) are outside the scope of this proceeding; and (2) parties cannot reopen the Company’s 2015 Integrated Resource Plan (IRP) in this expedited proceeding.

Consistent with its well-established process for allowing expedited review of avoided cost updates, the Public Utility Commission of Oregon (Commission) opened this docket to allow for expeditious vetting of PacifiCorp’s avoided cost update. Despite the expedited process and limited scope of this case, CREA and REC have each sought to unreasonably broaden the scope to include issues related to the Company’s 2016 renewable RFP and to rerun the Company’s 2015 IRP. Through two rulings on discovery motions, the ALJ rejected the Joint

1 QFs’ attempt to expand the scope of this proceeding to include issues that are irrelevant to a
2 review of PacifiCorp’s avoided cost update.

3 With the Motion for Clarification, the Joint QFs are attempting to collaterally attack the
4 discovery rulings and re-argue the scoping issues that were rejected in an attempt to undermine
5 the expeditious nature of this proceeding. The Joint QFs’ arguments to expand the scope of this
6 proceeding have no more merit than their previous, nearly identical, arguments to expand the
7 scope through discovery. The ALJ should affirm the previous rulings and ensure that the scope
8 of proceeding remains as the Commission intended—an expedited process to review and vet the
9 Company’s avoided cost updates. For these reasons, the ALJ should also deny the Motion to
10 Suspend Schedule.

11 II. STATEMENT OF FACTS

12 A. The Commission’s Initiation of Docket UM 1794

13 The Company’s 2015 IRP was acknowledged by the Commission on February 29, 2016.¹
14 As required by OAR 860-029-0080, on March 1, 2016, PacifiCorp filed updated avoided cost
15 pricing incorporating inputs from the acknowledged 2015 IRP.² The March 1 update was
16 docketed as UM 1729(1).

17 On March 8, 2016, Senate Bill (SB) 1547 was signed into law, which, *inter alia*, requires
18 PacifiCorp to serve 50 percent of its Oregon retail load with renewable energy by 2040.³
19 Considering the passage of SB 1547, parties challenged the renewable resource

¹ *In the Matter of PacifiCorp, dba Pacific Power, 2015 Integrated Resource Plan*, Docket No. LC 62, Order No. 16-071 (Feb. 29, 2016).

² *In the Matter of PacifiCorp, dba Pacific Power, Schedule 37 Avoided Cost Purchases from Eligible Qualifying Facilities*, Docket No. UM 1729(1), Order No. 16-307, App. A. at 2 (Aug. 18, 2016).

³ Senate Bill 1547, § 5. Oregon Leg. 2016 Regular Session.

1 sufficiency/deficiency demarcation in the 2015 IRP, claiming that it was obsolete due to the new
2 renewable resource requirements in SB 1547.⁴ After considering the March 1 update at its
3 March 22, 2016 public meeting, the Commission declined to approve the update due to the
4 potential impact of SB 1547.⁵ Instead, the Commission directed PacifiCorp and interested
5 parties to propose an expedited and non-contested case process to update the Company’s avoided
6 cost prices in light of the passage of SB 1547.⁶

7 On June 21, 2016, PacifiCorp filed a supplemental update to its Schedule 37 avoided cost
8 prices. The Commission addressed PacifiCorp’s June 21 update at a public meeting on
9 August 16, 2016, and issued Order No. 16-307 on August 18, 2016. The Commission directed
10 PacifiCorp to file updated standard avoided cost prices based on renewable and non-renewable
11 deficiency periods beginning in 2028, cost and performance data from the Company’s
12 acknowledged 2015 IRP, and updated natural gas and electricity prices as required in an annual
13 update.⁷

14 The Commission also opened this docket as an “expedited contested case proceeding” to
15 allow stakeholders to vet PacifiCorp’s proposed update considering the issues raised in docket
16 UM 1729(1).⁸ The Commission declined to provide any additional guidance on the scope of this
17 docket, instead deferring to the ALJ to make that determination.⁹

⁴ See e.g., *In the Matter of PacifiCorp, dba Pacific Power, Schedule 37 Avoided Cost Purchases from Eligible Qualifying Facilities*, Docket No. UM 1729(1), Order No. 16-117, App. A at 4 (Mar. 23, 2016).

⁵ *Id.* at 1.

⁶ *Id.* at 1.

⁷ Order No. 16-174, App. A at 3-4.

⁸ *Id.*

⁹ August 16, 2016, Public Meeting at 1:39.

1 **B. The ALJ’s Discovery Rulings Addressing the Scope of This Proceeding**

2 On November 2, 2016, the ALJ granted in part and denied in part a motion to compel
3 filed by CREA (November 2 Ruling).¹⁰ CREA had sought production of information from
4 PacifiCorp’s 2016 renewable RFP and internal documents supporting the Company’s ultimate
5 course of action regarding the use of a Wyoming wind farm as the proxy resource for purposes
6 of the avoided cost calculations.¹¹ CREA argued that it had not had an opportunity to vet all the
7 data in the 2015 IRP and that the RFP bid information was relevant to avoided cost prices
8 because it was disclosed by PacifiCorp at a special public meeting in a separate docket.¹² The
9 ALJ denied this aspect of CREA’s motion to compel, concluding that bids reviewed by the
10 Company after the 2015 IRP and events that occurred at public meetings in other dockets are
11 outside the scope of this proceeding.¹³

12 On November 18, 2016, the ALJ denied another motion to compel filed by REC
13 (November 18 Ruling).¹⁴ REC had requested that PacifiCorp provide new IRP computer model
14 runs to vet the Company’s 2015 IRP data based on what REC believes are more reasonable and
15 accurate inputs and assumptions.¹⁵ REC also requested that PacifiCorp provide access to its
16 computer models so that REC could run the models itself.¹⁶ In denying the motion, the ALJ
17 affirmed that in Order No. 16-307 the Commission “adopted the Staff’s recommendation which

¹⁰ *In the Matter of PacifiCorp, dba Pacific Power, Investigation into Schedule 37—Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less*, Docket No. UM 1794, Ruling (Nov. 2, 2016).

¹¹ *Id.* at 2.

¹² *Id.*

¹³ *Id.* at 3 (“Thus, Order No. 16-307 removed the discussion of any bids submitted or reviewed by the company after the 2015 IRP from consideration in the next phase of this proceeding.”).

¹⁴ *In the Matter of PacifiCorp, dba Pacific Power, Investigation into Schedule 37—Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less*, Docket No. UM 1794, Ruling (Nov. 18, 2016).

¹⁵ *Id.* at 1.

¹⁶ *Id.* at 3.

1 provided for a more thorough vetting of the company’s avoided costs via this proceeding, but
2 limited the post-2015 IRP acknowledgement avoided cost filing to the updated renewable
3 resource deficiency period and the three factors required by the annual May 1 Update.”¹⁷ The
4 ALJ further found that REC’s requests were unduly burdensome given the expedited nature of
5 this proceeding.¹⁸ Finally, the ALJ denied REC’s request for access to the models, due to the
6 limited nature of this proceeding and the contractual agreements that precluded PacifiCorp from
7 providing access.¹⁹

8 The Joint QFs now seek to challenge the ALJ’s discovery rulings and suspend the
9 procedural schedule on the grounds that the scope of this proceeding is unclear.²⁰ On
10 November 17, 2016, the Joint QF Parties filed a Joint Request for ALJ Certification of the
11 November 2 Ruling (November 17 Request) and have stated that they intend to request
12 certification of the November 18 Ruling.

13 Taken together, the ALJ’s two discovery rulings affirm that this case’s scope is limited
14 by its expedited nature and its narrow focus on vetting the reasonableness of the Company’s
15 post-2015 IRP avoided cost update. Therefore, contrary to the Joint QFs’ assertions in their
16 Motion to Suspend Schedule,²¹ the Joint QFs should already understand the proper scope and
17 should not need to suspend the schedule merely because they seek to challenge these discovery
18 rulings.

¹⁷ *Id.* at 2.

¹⁸ *Id.*

¹⁹ *Id.* at 3.

²⁰ *In the Matter of PacifiCorp, dba Pacific Power, Investigation into Schedule 37—Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less*, Docket No. UM 1794, Renewable Energy Coalition and Community Renewable Energy Association Motion to Suspend Schedule at 1.

²¹ *Id.*

1 **C. The Joint QFs’ Request to Suspend the Procedural Schedule**

2 On November 28, 2016, the Joint QFs filed a Joint Motion to Suspend Schedule pending
3 the resolution of the November 17 Request for Certification of the ALJ’s November 2 Ruling
4 and a yet-to-be-filed request for certification of the ALJ’s November 18 Ruling. PacifiCorp
5 already compromised with the Joint QFs and agreed to a three-week extension for the response
6 testimony. PacifiCorp also repeatedly agreed to expedite its response to motions to compel and
7 motions for certification to maintain the procedural schedule and resolve these discovery
8 disputes. PacifiCorp already agreed to expedited treatment of the Joint QFs’ November 17
9 Request for Certification to reach a resolution before response testimony is due on
10 December 9, 2016. PacifiCorp also agreed to the Joint QFs’ request to include a deadline for
11 supplemental testimony, if necessary.

12 **III. LEGAL STANDARD**

13 The Commission is required to establish avoided cost prices that are just and reasonable,
14 non-discriminatory, and not in excess of the utility’s avoided cost.²² “Avoided cost” is the cost
15 that the utility would have paid for the capacity and energy obtained from the qualifying facility
16 (QF) if the utility had purchased the capacity and energy from another source or generated the
17 power itself.²³ The avoided cost standard is intended to ensure that utility customers should be
18 neither helped nor harmed by the utility’s purchase of QF power, and, in fact, should remain
19 “indifferent as to whether the utility used more traditional sources of power or the newly-

²² See 16 U.S.C. §§ 824a-3(b), (d).

²³ 18 C.F.R. § 292.101(b)(6).

1 encouraged alternatives.”²⁴ The avoided cost requirement also ensures that QFs are not
2 subsidized at customers’ expense.²⁵

3 To better ensure customer indifference through up-to-date avoided cost pricing, utilities
4 are required to update their avoided cost prices annually on May 1 and within 30 days after
5 acknowledgment of an IRP.²⁶ The process for review of avoided cost updates was recently
6 addressed in docket UM 1610 and, on May 13, 2016, the Commission affirmed its “long-
7 established regulatory process” for avoided cost updates.²⁷ Under that process, the IRP’s inputs
8 and assumptions are vetted in the IRP process and the updated avoided costs are developed using
9 the fully vetted inputs and assumptions from the most recently acknowledged IRP.²⁸

10 The Commission has explained that the IRP is the proper forum for resolving resource
11 sufficiency issues because “the IRP processes are conducted with extensive public review
12 regarding the timing of the utility’s loads and its consequent resource needs.”²⁹ The avoided cost
13 update is therefore an expeditious process with a limited scope to determine whether the prices
14 conform to the Commission’s methodologies.³⁰ Notably, when the Commission affirmed its
15 long-established review process in Order No. 16-174, it specifically rejected proposals from the

²⁴ *So. Cal. Ed. Co.*, 71 F.E.R.C. ¶ 61,269, 62,079 (F.E.R.C. 1995); *Re Investigation Relating to Electric Utility Purchases from Qualifying Facilities*, Docket No. UM 1129, Order No. 05-584 at 11 and 19 (May 13, 2005); *Re Adoption of Administrative Rules Relating to Cost-Effective Fuel Use and Resource Development*, Docket No. AR 112, Order No. 85-010 at 18 (Jan. 8, 1985).

²⁵ *Indep. Energy Producers Ass’n v. Cal. Pub. Utils. Comm’n*, 36 F.3d 848, 858 (9th Cir. 1994).

²⁶ *Investigation into Qualifying Facility Contracting and Pricing*, Docket No. UM 1610, Order No. 14-058 at 25-26 (Feb. 24, 2014); *Investigation into Qualifying Facility Contracting and Pricing*, Docket No. UM 1610, Order No. 16-174 at 12 (May 13, 2016).

²⁷ Order No. 16-174 at 14-15.

²⁸ *Investigation into Determination of Resource Sufficiency, Pursuant to Order No. 06-538*, Docket No. UM 1396, Order No. 10-488 at 8 (Dec. 22, 2010).

²⁹ *Id.*

³⁰ *See Investigation to Determine if Pacific Power’s Rate Revision is Consistent with the Methodologies and Calculations Required by Order No. 05-584*, Docket No. UM 1442, Order No. 09-427 at 4 (Oct. 28, 2009) (scope of avoided cost updates limited to determining conformance with methodologies).

1 Joint QF that called for additional processes to litigate the IRP’s inputs and assumptions outside
2 of the IRP process.³¹ The Commission affirmed that those issues would be vetted in the IRP.

3 **IV. ARGUMENT**

4 **A. The Discovery Rulings Correctly Define the Scope of UM 1794**

5 The Joint QFs claim that Order No. 16-307 “broadly defined the scope of this proceeding
6 to include an investigation into PacifiCorp’s avoided costs,” including the “ability to challenge
7 the assumptions in PacifiCorp’s 2015 IRP[.]”³² The scope of this *expedited* case, however, is not
8 nearly so broad. Nothing in Order No. 16-307 suggests that the Commission intended to depart
9 from its long-standing regulatory process for avoided cost updates and allow parties to re-open
10 the recently acknowledged IRP or to address the results of recent RFPs that did not impact the
11 avoided cost update. Based on the expedited nature of this proceeding, and the Commission’s
12 long-standing treatment of avoided cost updates, the ALJ reasonably concluded that the results of
13 PacifiCorp’s 2016 renewable RFP are outside the scope of this proceeding and that PacifiCorp is
14 not required to re-run the modeling underlying its acknowledged 2015 IRP using inputs and
15 assumptions selected by the Joint QFs.³³ These rulings properly maintained the limited scope of
16 this case.

17 **1. PacifiCorp’s 2016 RFP Results are Outside the Scope of This Proceeding**

18 The Joint QFs claim that the RFP results are “squarely within the scope of issues in this
19 proceeding” because PacifiCorp raised the RFP in docket UM 1729(1) and the Commission
20 relied on the RFP results when setting the avoided cost prices in Order No. 16-307.³⁴ On the

³¹ Order No. 16-174 at 14-15.

³² Motion at 3.

³³ November 2 Ruling; November 18 Ruling.

³⁴ Motion at 11-12.

1 contrary, as described in greater detail in previous PacifiCorp filings in this case,³⁵ the Company
2 did *not* rely on the 2016 RFP results to develop its updated avoided cost prices in either
3 UM 1729(1) or this proceeding—a fact that CREA has acknowledged.³⁶ Moreover, there is no
4 evidence to support the Joint QFs’ claim that the Commission relied on the RFP results to set
5 avoided cost prices in Order No. 16-307.³⁷ Indeed, the Joint QFs make this broad statement
6 without any citation to the record in UM 1729(1) or to Order No. 16-307. In short, the RFP bids
7 were neither used to set the Company’s avoided cost prices nor considered by the Commission
8 when it approved PacifiCorp’s current avoided cost prices and are therefore outside the scope of
9 this expedited proceeding.

10 The Joint QFs also argue that PacifiCorp relies on “data from its IRP Update and other
11 dat[a] sources developed subsequent to the 2015 IRP,” and therefore it “would be fundamentally
12 unfair” to deny the Joint QFs the ability to rely on events and data after the 2015 IRP
13 acknowledgement, like the RFP results.³⁸ The Company has never argued, however, that
14 information developed after acknowledgement of its 2015 IRP is categorically beyond the scope
15 of this proceeding. The Company has argued that its avoided cost prices should be established
16 using the more up-to-date IRP Update.³⁹ Rather, the Company has argued consistently that the
17 RFP results are irrelevant to determining avoided cost prices, regardless of their timing.

³⁵ See *In the Matter of PacifiCorp, dba Pacific Power, Investigation into Schedule 37—Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less*, Docket No. UM 1794, PacifiCorp’s Motion for Clarification or, Alternatively, Certification (Oct. 12, 2016); *In the Matter of PacifiCorp, dba Pacific Power, Investigation into Schedule 37—Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less*, Docket No. UM 1794, PacifiCorp’s Response to Motion to Compel (Oct. 26, 2016).

³⁶ *In the Matter of PacifiCorp, dba Pacific Power, Investigation into Schedule 37—Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less*, Docket No. UM 1794, Motion to Compel Discovery by the Community Renewable Energy Association at 7 (Oct. 19, 2016).

³⁷ Motion at 12.

³⁸ *Id.* at 11.

³⁹ See e.g., PAC/100, Dickman/4.

1 In addition, if the Company is required to disclose the highly confidential, commercially
2 sensitive RFP information, this proceeding will become a forum for parties to attack the process
3 and results of the RFP. And compelling PacifiCorp to disclose confidential bids would have a
4 chilling effect on future RFPs because bidders would not be assured that the confidential bids
5 would remain protected from discovery by potential competitors, such as the members of CREA
6 and REC. This expedited contested case proceeding is to set the Company's avoided cost prices;
7 it is not an investigation into the process and results of the Company's RFPs.

8 **2. Re-Opening the 2015 IRP is Beyond the Scope of this Expedited Review**

9 The Joint QFs argue that the scope of this proceeding should be expanded to allow re-
10 opening the inputs and assumptions used in the acknowledged 2015 IRP, to effectively create a
11 new 2015 IRP, with a new preferred portfolio and a new resource deficiency period.⁴⁰ REC has
12 argued that it intends to challenge the validity of the inputs and assumptions in the 2015 IRP
13 based on what was known when the IRP was developed.⁴¹ As reflected in the ALJ's
14 November 18 Ruling, however, such an expansive scope is fundamentally inconsistent with the
15 expedited nature of this case.⁴²

16 As described in previous PacifiCorp filings, to perform the analysis the Joint QFs argue is
17 within the scope of this case would require approximately 100 model runs, which would take at
18 least a month to complete.⁴³ Moreover, the additional model runs that would then be required to

⁴⁰ Motion at 3, 10, 12.

⁴¹ *In the Matter of PacifiCorp, dba Pacific Power, Investigation into Schedule 37—Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less*, Docket No. UM 1794, Renewable Energy Coalition's Motion to Compel Discovery at 2, 7-8 (Oct. 31, 2016).

⁴² November 18 Ruling at 2.

⁴³ *In the Matter of PacifiCorp, dba Pacific Power, Investigation into Schedule 37—Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less*, Docket No. UM 1794, PacifiCorp's Response to Motion to Compel (Nov. 7, 2016).

1 rebut the Joint QFs’ testimony would take extensive time to complete, causing additional delay.
2 Expanding the scope of this case to re-open the inputs and assumptions in the 2015 IRP would
3 transform this proceeding from an expedited avoided cost docket into a new IRP proceeding.

4 In addition, the Joint QFs’ attempt to broaden the scope of this proceeding is an improper
5 collateral attack on Order No. 16-174 where the Commission explicitly rejected proposals by the
6 Joint QFs to allow litigation of an IRP’s inputs and assumptions outside the IRP process in an
7 avoided cost update.⁴⁴ The purpose of this proceeding is to vet the Company’s updated avoided
8 cost prices. The inputs and assumptions that were used to develop the 2015 IRP were already
9 thoroughly vetted in the IRP process—a process that included REC as an active participant.

10 Finally, limiting the scope of this proceeding consistent with previous precedent will not
11 deprive the Joint QFs of an opportunity to propose more up-to-date inputs and assumptions to the
12 Company’s resource planning process given that the Company’s public process for the
13 development of its 2017 IRP has already begun. The 2017 IRP is the correct forum for the Joint
14 QFs’ request to develop a new IRP based on more up-to-date inputs and assumptions.

15 **B. The Joint QFs Can Reasonably Vet PacifiCorp’s Updated Avoided Cost Prices**
16 **without Expanding the Scope of This Proceeding**

17 The Joint QFs claim that the discovery rulings in this proceeding effectively eliminate
18 their ability to challenge the reasonableness of PacifiCorp’s updated avoided cost prices.⁴⁵ But
19 the Joint QFs admit that parties—including the Joint QFs—regularly vet utilities’ post-IRP
20 avoided cost price updates without re-opening the underlying IRP.⁴⁶ This is the exact, long-

⁴⁴ Order No. 16-174 at 14-15; *In the Matter of the Application of Portland General Electric Company for an Investigation into Least Cost Plan Plant Retirement*, Docket Nos. DR 10, UE 88 & UM 989, Order No. 08-487 at 8 (Sept. 30, 2008) (collateral attacks improper).

⁴⁵ Motion at 9.

⁴⁶ *Id.* at 8.

1 standing process that the Commission recently examined and affirmed, concluding that “there is
2 value in the sequential nature of reviewing avoided costs after acknowledgement of a utility’s
3 IRP” and that challenging the IRP’s inputs and assumptions once, in the IRP, “minimize[s] the
4 administrative burden on all the parties.”⁴⁷

5 Moreover, the Joint QFs do not need the RFP results to challenge the resource cost and
6 performance inputs used to develop avoided cost prices. The Joint QFs can use publicly
7 available information, just as PacifiCorp did in its opening testimony.⁴⁸ Thus, the Joint QFs can
8 review and assess the reasonableness of the Company’s updated avoided cost prices without
9 unreasonably expanding the scope of this case to re-open the 2015 IRP and 2016 RFP.

10 **C. Suspending the Procedural Schedule is Unnecessary and Would Undermine the**
11 **Expedited Nature of this Proceeding**

12 The Joint QFs argue that they will be forced to submit testimony without understanding
13 the proper scope of this proceeding unless the procedural schedule is suspended.⁴⁹ The Joint QFs
14 ignore the ALJ’s two discovery rulings, which, as explained above, have properly maintained the
15 limited scope of this expedited proceeding. Instead, the Joint QFs seek to suspend the procedural
16 schedule on the basis of one request for certification of the November 2 Ruling filed on
17 November 17, 2016, and one yet-to-be-filed request for certification of the November 18 Ruling.
18 As discussed above, the scope of this proceeding has been clearly and narrowly defined by the
19 ALJ in the two discovery rulings. Therefore, the Joint QFs’ request to suspend the procedural
20 schedule pending the resolution of their attempts to challenge these discovery rulings is not
21 reasonable in this case.

⁴⁷ Order No. 16-174 at 14-15.

⁴⁸ PAC/100, Dickman/12-13.

⁴⁹ Motion to Suspend Schedule at 1.

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V. CONCLUSION

The Commission opened this proceeding to vet the Company's avoided cost update in an expedited process. Consistent with this narrow purpose, the ALJ issued two discovery rulings that correctly and reasonably limited the scope of this proceeding to only those issues that are directly relevant to the avoided cost update and that will not alter the expedited nature of this proceeding. The ALJ should affirm the scope of this docket, as expressed in his previous rulings. The ALJ should also deny the Motion to Suspend Schedule.

Respectfully submitted this 30th day of November, 2016.



Erin Apperson
Legal Counsel
PacifiCorp d/b/a Pacific Power