

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP)	UE 323
)	
PacifiCorp 2018 Transition Adjustment Mechanism)	MOTION TO ADMIT TESTIMONY AND EXHIBITS OF CALPINE ENERGY SOLUTIONS, LLC
)	

Calpine Energy Solutions LLC (“Calpine Solutions”) hereby moves to admit its testimony and exhibits into the evidentiary record in this proceeding.

Specifically, Calpine Solutions moves for the admission of the opening and rebuttal testimony of Kevin C. Higgins in this proceeding, which are Calpine Solutions/100 through Calpine Solutions/105 and Calpine Solutions/200 through Calpine Solutions/202, respectively. In support thereof, Calpine Solutions has attached the affidavit of Kevin C. Higgins as to the veracity of that testimony and those exhibits. Administrative Law Judge Sarah Rowe also admitted Calpine Solutions/400 and Calpine Solutions/401 at the hearing, both of which were filed prior to the hearing.

Additionally, for the sake of clarity, Calpine Solutions does not move for the admission of the proposed additional rebuttal testimony of Kevin C. Higgins (labeled Calpine Solutions/300 through Calpine Solutions/301). Because PacifiCorp withdrew the relevant portions of its testimony in PacifiCorp/800 and did not offer that testimony for admission in response to Calpine Solutions’ motion to strike, Calpine Solutions is not moving for admission of its proposed additional rebuttal testimony. However, it is included on the list here to provide clarity as to the number sequence of the exhibits already admitted.

A complete list of Calpine Solutions' list of all testimony and exhibits filed is as follows:

Pre-Filed Testimony and Exhibits

Testimony/Exhibit	Description	Date Filed or Submitted
Calpine Solutions/100	Opening Testimony of Kevin C. Higgins	June 9, 2017
Calpine Solutions/101	OPUC Status Report – Oregon Electric Industry Restructuring (July 2016)	June 9, 2017
Calpine Solutions/102	PacifiCorp Responses to Data Requests Referenced in Testimony	June 9, 2017
Calpine Solutions/103	Non-Confidential Excerpt from PacifiCorp Response to Calpine Solutions Data Request 1.7	June 9, 2017
Calpine Solutions/104	Calpine Solutions Adjustment to Sample Schedule 296 Consumer Opt-Out Charges for Schedules 30 - S and 48 - P	June 9, 2017
Calpine Solutions/105	Oregon Fixed Generation Costs 2006-2015 with Incremental Generation Investment Removed	June 9, 2017
Calpine Solutions/200	Rebuttal Testimony of Kevin C. Higgins	August 2, 2017
Redacted and Confidential Calpine Solutions/201	PacifiCorp Response to Calpine Solutions Data Request 6.1	August 2, 2017
Calpine Solutions/202	PacifiCorp Response to Calpine Solutions Data Request 1.3	August 2, 2017
Calpine Solutions/300 (not offered for admission)	Proposed Additional Rebuttal Testimony of Kevin C. Higgins	August 24, 2017
Calpine Solutions/301 (not offered for admission)	Additional Fixed Generation Cost Calculations in Support of Additional Rebuttal Testimony	August 24, 2017

Hearing Exhibits

Testimony/Exhibit	Description	Date Filed or Admitted
Calpine Solutions/400	PacifiCorp's Response to Calpine Solutions Data Request 1.8	Filed August 25, 2016; Admitted at Hearing
Calpine Solutions/401	PacifiCorp's Response and 1st Revised Response to Calpine Solutions Data Request 3.1	Filed August 25, 2016; Admitted at Hearing

DATED this 8th day of September 2017.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No. 101779)
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
greg@richardsonadams.com
Of Attorneys for Calpine Energy Solutions,
LLC

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP)	UE 323
)	
PacifiCorp 2018 Transition Adjustment Mechanism)	AFFIDAVIT OF KEVIN C. HIGGINS IN SUPPORT OF TESTIMONY AND EXHIBITS
)	

STATE of Utah)	
)	ss.
County of Salt Lake)	

I, Kevin C. Higgins, being first duly sworn on oath, depose and say:

1. My name is Kevin C. Higgins. I testified on behalf of Calpine Energy Solutions LLC (“Calpine Solutions”) in this case.

2. I am the same Kevin C. Higgins that previously caused to be filed following testimony and exhibits in this docket:

Testimony/Exhibit	Description	Date Filed or Submitted
Calpine Solutions/100	Opening Testimony of Kevin C. Higgins	June 9, 2017
Calpine Solutions/101	OPUC Status Report – Oregon Electric Industry Restructuring (July 2016)	June 9, 2017
Calpine Solutions/102	PacifiCorp Responses to Data Requests Referenced in Testimony	June 9, 2017
Calpine Solutions/103	Non-Confidential Excerpt from PacifiCorp Response to Calpine Solutions Data Request 1.7	June 9, 2017
Calpine Solutions/104	Calpine Solutions Adjustment to Sample Schedule 296 Consumer Opt-Out Charges for Schedules 30 - S and 48 - P	June 9, 2017
Calpine Solutions/105	Oregon Fixed Generation Costs 2006-2015 with Incremental	June 9, 2017

	Generation Investment Removed	
Calpine Solutions/200	Rebuttal Testimony of Kevin C. Higgins	August 2, 2017
Redacted and Confidential Calpine Solutions/201	PacifiCorp Response to Calpine Solutions Data Request 6.1	August 2, 2017
Calpine Solutions/202	PacifiCorp Response to Calpine Solutions Data Request 1.3	August 2, 2017

3. My pre-filed testimony is true and accurate based on my information and belief, and my responses to the questions therein would be the same today.

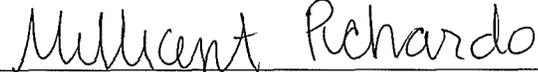
I declare under penalty of perjury under the laws of the state of Utah that the foregoing is true and correct based on my information and belief.

I signed this the 1st day of September 2017.



 Kevin C. Higgins

SUBSCRIBED AND SWORN to before me this 1st day of September 2017.



 Notary Public for the State of Utah

Residing at Salt Lake City, UT

My Commission expires June 6, 2018

