



KATHERINE McDOWELL  
Direct (503) 595-3924  
katherine@mrg-law.com

August 29, 2017

**VIA ELECTRONIC FILING**

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

**Re: UE 323–In the Matter PACIFICORP, dba PACIFIC POWER, 2018 Transition  
Adjustment Mechanism**

Attention Filing Center:

Attached for filing in the above-captioned docket is an electronic copy of PacifiCorp's Revised List of Exhibits to be Entered into the Record and a Supplemental Cross-Examination Exhibit (PAC/1112). This cross-examination exhibit relates to the testimony of Sierra Club, and Sierra Club stipulates to its admission. It was not included in PacifiCorp's original exhibit list because the document was not available at that time.

In addition, PacifiCorp is withdrawing two cross-examination exhibits, PAC/1103 and PAC/1104. The attached revised exhibit list captures these changes.

Please contact this office with any questions.

Very truly yours,



Katherine McDowell

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 323**

In the Matter of:

PACIFICORP, dba PACIFIC POWER  
2018 Transition Adjustment Mechanism

**PACIFICORP'S REVISED LIST OF  
EXHIBITS TO BE ENTERED INTO THE  
RECORD**

**PREFILED EXHIBITS**

- |                 |  |
|-----------------|--|
| Exhibit PAC/100 | CONFIDENTIAL Direct Testimony of Michael G. Wilding, dated March 2017.   |
| Exhibit PAC/101 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (Oregon Allocated Net Power Costs).                              |
| Exhibit PAC/102 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (Net Power Costs Report).  |
| Exhibit PAC/103 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (Update to Other Revenues).                                      |
| Exhibit PAC/104 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (Energy Imbalance Market Import and Export Summary).             |
| Exhibit PAC/105 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (Energy Imbalance Market Costs).                                 |
| Exhibit PAC/106 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (Update to Renewable Energy Production Tax Credits).             |
| Exhibit PAC/107 | CONFIDENTIAL Exhibit Accompanying Direct Testimony of Michael G. Wilding (Topics List and Presentations from TAM workshops). |
| Exhibit PAC/108 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (Step Log Change).   |
| Exhibit PAC/109 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (March 1 Notice Letter).   |
| Exhibit PAC/110 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (Time Series of Fixed Generation Costs).                         |
| Exhibit PAC/111 | Exhibit Accompanying Direct Testimony of Michael G. Wilding (List of Expected or Known Contract Updates).                    |
| Exhibit PAC/200 | CONFIDENTIAL Direct Testimony of Dana M. Ralston, dated March 2017.  |

Exhibit PAC/201	CONFIDENTIAL Exhibit Accompanying Direct Testimony of Dana M. Ralston (Presentations Provided at Fuel Planning Workshops).
Exhibit PAC/300	Direct Testimony of Judith M. Ridenour, dated March 2017.
Exhibit PAC/301	Exhibit Accompanying Direct Testimony of Judith M. Ridenour (Proposed TAM Rate Spread and Rates).
Exhibit PAC/302	Exhibit Accompanying Direct Testimony of Judith M. Ridenour (Proposed TAM Adjustment for Other Items).
Exhibit PAC/303	Exhibit Accompanying Direct Testimony of Judith M. Ridenour (Proposed Tariff Schedules).
Exhibit PAC/304	Exhibit Accompanying Direct Testimony of Judith M. Ridenour (Estimated Effect of Proposed TAM Price Change).
Exhibit PAC/400	CONFIDENTIAL Reply Testimony of Michael G. Wilding, dated July 2017.
Exhibit PAC/401	Exhibit Accompanying Reply Testimony of Michael G. Wilding (2018 TAM Allocation Reply Filing).
Exhibit PAC/402	Exhibit Accompanying Reply Testimony of Michael G. Wilding (2018 TAM Results of Updated NPC Study Reply Filing).
Exhibit PAC/403	Exhibit Accompanying Reply Testimony of Michael G. Wilding (2018 TAM Corrections and Updates Summary Reply Filing).
Exhibit PAC/404	Exhibit Accompanying Reply Testimony of Michael G. Wilding (2018 TAM Other Revenue Reply Filing).
Exhibit PAC/405	Exhibit Accompanying Reply Testimony of Michael G. Wilding (2018 TAM EIM Costs Reply Filing 2017).
Exhibit PAC/406	Exhibit Accompanying Reply Testimony of Michael G. Wilding (Notice 2017-33, 2017-22 IRB 1256, 05/26/2017, IRC Sec(s). 45).
Exhibit PAC/407	Exhibit Accompanying Reply Testimony of Michael G. Wilding (NERA's Report on Power Cost Adjustments and Act 162 Compliance).
Exhibit PAC/408	CONFIDENTIAL Exhibit Accompanying Reply Testimony of Michael G. Wilding (Staff Response to PacifiCorp Data Request 4).
Exhibit PAC/409	Exhibit Accompanying Reply Testimony of Michael G. Wilding (Staff Response to PacifiCorp Data Request 5).
Exhibit PAC/410	Exhibit Accompanying Reply Testimony of Michael G. Wilding (CUB Response to PacifiCorp Data Request 2).
Exhibit PAC/500	CONFIDENTIAL Reply Testimony of Kelcey A. Brown, dated July 2017.

- Exhibit PAC/600 CONFIDENTIAL Reply Testimony of Dana M. Ralston, dated July 2017.
- Exhibit PAC/700 CONFIDENTIAL Reply Testimony of Seth Schwartz, dated July 2017.
- Exhibit PAC/701 Exhibit Accompanying Reply Testimony of Seth Schwartz (Resume of Seth Schwartz).
- Exhibit PAC/800 CONFIDENTIAL Surrebuttal Testimony of Michael G. Wilding, dated August 2017.
- Exhibit PAC/801 Exhibit Accompanying Surrebuttal Testimony of Michael G. Wilding (List of Proposed Adjustments).
- Exhibit PAC/900 CONFIDENTIAL Surrebuttal Testimony of Kelcey A. Brown, dated August 2017.
- Exhibit PAC/901 Exhibit Accompanying Surrebuttal Testimony of Kelcey A. Brown (Portland General Electric Company Energy Imbalance Market Report).
- Exhibit PAC/902 Exhibit Accompanying Surrebuttal Testimony of Kelcey A. Brown (Idaho Power Company Energy Imbalance Market Report).
- Exhibit PAC/1000 CONFIDENTIAL Surrebuttal Testimony of Dana M. Ralston, dated August 2017.
- Exhibit PAC/1001 CONFIDENTIAL Exhibit Accompanying Surrebuttal Testimony of Dana M. Ralston (Excerpt from Confidential Workpapers of Thomas Vitolo on October 2015 Naughton Coal Costs).


#### **CROSS-EXAMINATION EXHIBITS**

- Exhibit PAC/1100 Public Utility Commission of Oregon Staff Report (with excerpted attachments) in Docket UE 307, March 21, 2017.
- Exhibit PAC/1101 Public Utility Commission of Oregon Staff Response to PacifiCorp's Data Request No. 09.
- Exhibit PAC/1102 Staff Post Hearing Brief in Docket UE 245.
- Exhibit PAC/1103 WITHDRAWN
- Exhibit PAC/1104 WITHDRAWN
- Exhibit PAC/1105 Excerpt from System Simulation by D.S. Hira
- Exhibit PAC/1106 CONFIDENTIAL Gibbens Workpaper Supporting Staff/400.
- Exhibit PAC/1107 CONFIDENTIAL Excerpt from Gibbens Workpaper Supporting Staff/100.

- Exhibit PAC/1108 Industrial Customers of Northwest Utilities' Response to PacifiCorp's Data Request No. 4. in Docket UE 296.
- Exhibit PAC/1109 Excerpt from REDACTED Opening Testimony of Bradley G. Mullins in Docket UE 308.
- Exhibit PAC/1110 Excerpt from REDACTED Response Brief of the Industrial Customers of Northwest Utilities in Docket UE 296.
- Exhibit PAC/1111 Excerpt from REDACTED Opening Testimony of Bradley G. Mullins in Docket UE 296.
- Exhibit PAC/1112 Scope of Proposed TAM Workshop

DATED: August 29, 2017

MCDOWELL RACKNER GIBSON PC



Katherine McDowell  
Adam Lowney  
Attorneys for PacifiCorp

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 323**

**PACIFICORP**

---

**PAC/1112**

**Scope of Proposed TAM Workshop**

**August 29, 2017**



KATHERINE McDOWELL  
Direct (503) 595-3924  
katherine@mrg-law.com

August 29, 2017

**VIA ELECTRONIC MAIL**

Travis Ritchie  
Sierra Club Environmental Law Program  
2101 Webster Street, Suite 1300  
Oakland, CA 94612

**Re: UE 323– In the Matter PACIFICORP, dba PACIFIC POWER, 2018 Transition  
Adjustment Mechanism**

Dear Travis:

Attached is a document outlining the scope of the workshop PacifiCorp proposes to hold to address the issues raised in this docket regarding long-term coal contracts and including variable O&M in the Company's net power cost modeling. PacifiCorp agrees to present this workshop proposal to the Commission in its post-hearing briefs in this case, and agrees to adhere to it unless the Commission orders a different resolution of these issues in its final order.

I understand that Sierra Club supports this workshop proposal. I also understand that, for purposes of this docket only, PacifiCorp's workshop proposal resolves the adjustments and recommendations in Sierra Club's testimony.

Very truly yours,



Katherine McDowell

Attachment



## **SCOPE OF WORKSHOP ON LONG-TERM COAL CONTRACTS AND INCLUDING VARIABLE O&M IN OREGON TAM**

Oregon Docket UE 323, August 29, 2017

In surrebuttal testimony, PacifiCorp stated it was amenable to holding a workshop to discuss PacifiCorp's coal procurement practices, and that this would be more effective than a written report in conveying information to the parties. PacifiCorp also agreed to a workshop to review the inclusion of variable Operations and Maintenance costs (O&M) in net power cost (NPC) modeling in GRID, and how to reflect these costs in rates.

PacifiCorp proposes to work with interested parties to determine a mutually convenient time in early 2018 to hold a workshop on these issues. PacifiCorp will facilitate a general discussion and provide initial presentations that address the following issues:

- 1) PacifiCorp's process by which the terms and conditions of long-term coal contracts are developed, negotiated and approved, and how the company accounts for plant fuel requirements when negotiating long-term contracts or coal mine investment decisions.
- 2) PacifiCorp's process for managing risk in long-term coal contracts related to: (a) price; (b) contract length; (c) minimum take provisions; (d) liquidated damages; and (e) changing electricity market conditions.
- 3) How long-term coal contract provisions impact dispatch decisions in GRID, commitment decisions, and long-term system modeling decisions.
- 5) How (a) long-term coal contracts, (b) fuel transportation contracts, and (c) spot market coal fuel purchases are each reviewed before the Public Utility Commission of Oregon.
- 6) The potential development of a method to reflect variable O&M in NPC, including classification of which O&M costs should be treated as variable and the treatment of variable O&M in rates.



## CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's **Revised List of Exhibits to be Entered into the Record** on the parties listed below via electronic mail and/or or overnight delivery in compliance with OAR 860-001-0180.

### Service List UE 323

<b>CALPINE SOLUTIONS</b>	
GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 <a href="mailto:greg@richardsonadams.com">greg@richardsonadams.com</a>	GREG BASS CALPINE ENERGY SOLUTIONS, LLC 401 WEST A ST, STE 500 SAN DIEGO, CA 92101 <a href="mailto:greg.bass@calpinesolutions.com">greg.bass@calpinesolutions.com</a>
KEVIN HIGGINS (C) ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY, UT 84111-2322 <a href="mailto:khiggins@energystrat.com">khiggins@energystrat.com</a>	
<b>ICNU UE 323</b>	
JESSE E COWELL (C) DAVISON VAN CLEVE 333 SW TAYLOR ST., SUITE 400 PORTLAND, OR 97204 <a href="mailto:jec@dvclaw.com">jec@dvclaw.com</a>	BRADLEY MULLINS (C) MOUNTAIN WEST ANALYTICS 333 SW TAYLOR STE 400 PORTLAND, OR 97204 <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a>
<b>OREGON CITIZENS' UTILITY BOARD</b>	
OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 <a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a>	MICHAEL GOETZ (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 <a href="mailto:mike@oregoncub.org">mike@oregoncub.org</a>
ROBERT JENKS (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>	
<b>PACIFICORP UE 323</b>	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 <a href="mailto:oregondockets@pacificorp.com">oregondockets@pacificorp.com</a>	KATHERINE A MCDOWELL (C) MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 <a href="mailto:katherine@mcd-law.com">katherine@mcd-law.com</a>

MATTHEW MCVEE (C) PACIFICORP 825 NE MULTNOMAH PORTLAND, OR 97232 <a href="mailto:matthew.mcvee@pacificorp.com">matthew.mcvee@pacificorp.com</a>	
<b>SIERRA CLUB</b>	
TRAVIS RITCHIE (C) SIERRA CLUB ENVIRONMENTAL LAW PROGRAM 2101 WEBSTER STREET, SUITE 1300 OAKLAND, CA 94612 <a href="mailto:travis.ritchie@sierraclub.org">travis.ritchie@sierraclub.org</a>	JOSHUA SMITH SIERRA CLUB 2101 WEBSTER STE STE 1300 OAKLAND, CA 94612 <a href="mailto:joshua.smith@sierraclub.org">joshua.smith@sierraclub.org</a>
ALEXA ZIMBALIST (C) SIERRA CLUB 2101 WEBSTER ST STE 1300 OAKLAND, CA 94612 <a href="mailto:alexa.zimbalist@sierraclub.org">alexa.zimbalist@sierraclub.org</a>	
<b>STAFF UE 323</b>	
GEORGE COMPTON (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308-1088 <a href="mailto:george.compton@state.or.us">george.compton@state.or.us</a>	SCOTT GIBBENS (C) PUBLIC UTILITY COMMISSION 201 HIGH ST SE SALEM, OR 97301 <a href="mailto:scott.gibbens@state.or.us">scott.gibbens@state.or.us</a>
SOMMER MOSER (C) PUC STAFF - DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM, OR 97301 <a href="mailto:sommer.moser@doj.state.or.us">sommer.moser@doj.state.or.us</a>	

Dated this 29<sup>th</sup> day of August 2017.



Alisha Till  
Administrative Assistant  
McDowell Rackner Gibson, PC