

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 323

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER,)
) CUB’S CROSS-EXAMINATION EXHIBITS
2018 Transition Adjustment Mechanism.)
)
_____)

The Oregon Citizens’ Utility Board (“CUB”) hereby submits its Cross Examination Exhibits in the above-captioned proceeding. Based on the record and discovery provided at this time, CUB intends to introduce the following Exhibits at the hearing:

Cross Examination Exhibit	Description
Exhibit 301	Confidential Data Response 2 from PAC to CUB
Exhibit 302	Confidential Data Response 4 from PAC to CUB
Exhibit 303	Confidential Data Response 9 from PAC to CUB
Exhibit 304	Data Response 10 from PAC to CUB
Exhibit 305	Confidential Data Response 11 from PAC to CUB
Exhibit 306	PacifiCorp’s Net Power Cost Indicative Update for 2017

CUB also reserves the right to move for admission of any additional material provided in discovery after the time of this filing.

DATED this 24th day of August, 2017.



Michael P. Goetz, OSB #141465
Staff Attorney
Oregon Citizens’ Utility Board
610 SW Broadway, Ste. 400
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E. mike@oregoncub.org

UE 323
CERTIFICATE OF SERVICE

I certify that on August 24, 2017, I served the non-confidential portions of the Oregon Citizens' Utility Board's cross examination exhibits on all parties to the service list for UE 323, via the Oregon Public Utility Commission's electronic filing system, and that I served the confidential portions of the filing on the following qualified individuals via Huddle and via United States Postal Service first class mail.

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES	BRADLEY MULLINS MOUNTAIN WEST ANALYTICS	333 SW TAYLOR STE 400 PORTLAND OR 97204 brmullins@mwanalytics.com
	JESSE E COWELL DAVISON VAN CLEVE, PC	333 SW TAYLOR SUITE 400 PORTLAND OR 97204 jec@dvclaw.com
CALPINE SOLUTIONS	GREGORY M. ADAMS	PO BOX 7218 BOISE ID 83702 greg@richardsonadams.com
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A handwritten signature in blue ink, appearing to read "Michael P. Goetz".

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UE 323 / PacifiCorp
July 10, 2017
CUB Data Request 2

CUB Data Request 2

Please see PacifiCorp's Confidential Attachment CUB 1, in response to CUB DR 1. For each PURPA qualifying facility (QF) that the Company indicated would be delayed, please identify the total dollar amount that was forecast into NPC in the TAM filing. For each delayed QF, please also give a month-by-month breakdown of forecasted costs (i.e. the total dollar forecast amount broken down by month). Please consider this an ongoing request to be updated throughout this case.

Response to CUB Data Request 2

Please refer to the Confidential Attachment CUB 2.

Confidential information is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

UE 323 / PacifiCorp
July 19, 2017
CUB Data Request 2 – 1st Supplemental

CUB Data Request 2

Please see PacifiCorp's Confidential Attachment CUB 1, in response to CUB DR 1. For each PURPA qualifying facility (QF) that the Company indicated would be delayed, please identify the total dollar amount that was forecast into NPC in the TAM filing. For each delayed QF, please also give a month-by-month breakdown of forecasted costs (i.e. the total dollar forecast amount broken down by month). Please consider this an ongoing request to be updated throughout this case.

1st Supplemental Response to CUB Data Request 2

Further to the Company's previous responses to CUB Data Request 2, the Company provides the following updated information based on the July 2017 Update / Reply Filing, submitted to the Public Utility Commission of Oregon (OPUC) on July 11, 2017:

Please refer to Confidential Attachment CUB 2 1st Supplemental.

Confidential information is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

UE 323 / PacifiCorp
July 19, 2017
CUB Data Request 2 – 1st Revised

CUB Data Request 2

Please see PacifiCorp's Confidential Attachment CUB 1, in response to CUB DR 1. For each PURPA qualifying facility (QF) that the Company indicated would be delayed, please identify the total dollar amount that was forecast into NPC in the TAM filing. For each delayed QF, please also give a month-by-month breakdown of forecasted costs (i.e. the total dollar forecast amount broken down by month). Please consider this an ongoing request to be updated throughout this case.

1st Revised Response to CUB Data Request 2

Further to the Company's response to CUB Data Request 2 dated July 10, 2017, the Company provides the following revised / corrected information:

The Company's original response incorrectly provided the requested data as total megawatt-hours (MWh), however the request was for total dollars (\$). This 1st Revised response replaces, in its entirety, the Company's original response.

Please refer to Confidential Attachment CUB 2 1st Revised.

Confidential information is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

Confidential CUB Exhibits 301 are confidential and were submitted to each party designated to receive confidential information pursuant to Order 16-128.

UE 323 / PacifiCorp
July 21, 2017
CUB Data Request 4

CUB Data Request 4

Please provide a spreadsheet that includes the following information for each month beginning in January 2016 through June 2017:

- (a) Number of QFs forecast for that month in final TAM forecast;
- (b) Actual number of QFs delivering power that month;
- (c) MWh of QFs forecast for that month in the final TAM forecast;
- (d) Actual MWh of QF delivered in that month;
- (e) Cost of QF forecast for that month in final TAM forecast;
- (f) Actual cost of QFs that delivered power in that month.

Response to CUB Data Request 4

Please refer to Confidential Attachment CUB 4.

The Company currently has actual net power costs (NPC) data through May 2017. The Company will supplement this response with June 2017 data, when it becomes available.

Confidential information is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

UE 323 / PacifiCorp
August 16, 2017
CUB Data Request 4 – 1st Supplemental

CUB Data Request 4

Please provide a spreadsheet that includes the following information for each month beginning in January 2016 through June 2017:

- (a) Number of QFs forecast for that month in final TAM forecast;
- (b) Actual number of QFs delivering power that month;
- (c) MWh of QFs forecast for that month in the final TAM forecast;
- (d) Actual MWh of QF delivered in that month;
- (e) Cost of QF forecast for that month in final TAM forecast;
- (f) Actual cost of QFs that delivered power in that month.

1st Supplemental Response to CUB Data Request 4

Further to the Company's response to CUB Data Request 4 dated July 21, 2017, the Company provides the following supplemental information:

Please refer to Confidential Attachment CUB 4 1st Supplemental, which provides information for June 2017.

Confidential information is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

Confidential CUB Exhibits 302 are confidential and were submitted to each party designated to receive confidential information pursuant to Order 16-128.

UE 323 / PacifiCorp
August 3, 2017
CUB Data Request 9

CUB Data Request 9

See CUB/100/Jenks/8. For all eighteen QF projects delayed since the Company's final update in UE 307, please provide a monthly status update for each, as referenced in UE 323/PAC/400/Wilding/37, lines 17-18, from July 2016 through the commercial operation date or July 2017 (if the QF has not yet reached COD).

Response to CUB Data Request 9

Please refer to Confidential Attachment CUB 9.

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Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

Confidential CUB Exhibit 303 is confidential and was submitted to each party designated to receive confidential information pursuant to Order 16-128.

UE 323 / PacifiCorp
August 3, 2017
CUB Data Request 10

CUB Data Request 10

UE 323/PAC/400/Wilding/37 referenced PacifiCorp's monitoring of the status of the generator interconnection process.

- (a) For each QF referenced in the above DR 9, please explain why monitoring the status of the generator interconnection process failed to identify that these eighteen QF projects were being delayed beyond their forecasted COD.
- (b) Please provide any memos, emails or other written materials that were developed through this monitoring process associated with these eighteen projects.

Response to CUB Data Request 10

- (a) The Company deems that qualifying facility (QF) projects that are expected to achieve commercial operation during the forecast period based on the commercial operation date (COD) identified in the executed power purchase agreement (PPA), informed by continual discussions with each QF. QFs provide updates on agreed milestones to assist in the evaluation of their ability to meet the COD identified in the PPA. Additionally, QFs will inform the Company of any significant issue. At the time of filing, the Company uses the best available information to forecast the CODs. The QFs were delayed based on additional information the Company received from the counterparties after the final transition adjustment mechanism (TAM) updates.

Monitoring the status of the generation interconnection process is one of several resources the Company relies on to forecast the expected commercial operational data.

Under PacifiCorp's Open Access Transmission Tariff (OATT) and the Federal Energy Regulatory Commission's standards of conduct requirements, PacifiCorp merchant only has access to publicly available reports posted to the Open Access Same-Time Information System (OASIS) or project information provided by the QF. These interconnection studies are reviewed by PacifiCorp merchant once they are posted to OASIS; however, the final interconnection construction schedule may change over time if there are restudies that occur at the request of the QF or PacifiCorp transmission. PacifiCorp merchant may not be aware of them if the QF does not specifically inform PacifiCorp merchant.

The Oregon standard QF PPA does not contain a contractual obligation on the QF to update PacifiCorp merchant on the status of its forecasted COD, therefore PacifiCorp merchant relies on regular monthly contact with the QF to understand the project status and schedule. Generally, in the early stages of development, there is minimal change to schedules, but as the QF begins financing, its schedule firms up and milestones for construction, etc. are established and communicated with PacifiCorp

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

UE 323 / PacifiCorp
August 3, 2017
CUB Data Request 10

merchant.

- (b) PacifiCorp does not maintain any log of monitoring the QF's interconnection process. It is one method used to identify progress of a QF project.

UE 323 / PacifiCorp
August 17, 2017
CUB Data Request 11

CUB Data Request 11

According to UE 323 – PAC/400/Wilding/400/34 at lines 17-18, QF “counterparties provide project status updates on a monthly basis that document progress toward milestones and the commercial operation date.” For the eighteen QF projects that were identified as delayed in CUB’s testimony (*see* CUB/100/Jenks/8) and the subject of CUB DR 9, please provide copies of the monthly status updates provided to PacifiCorp by the counterparties. Rather than providing a summary of monthly updates, please provide the updates themselves.

Response to CUB Data Request 11

The Company objects to this request as overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, the Company responds as follows:

The standard offer Oregon qualifying facility (QF) power purchase agreement (PPA) does not contain language that requires the QF to deliver a monthly progress report like the Company’s other jurisdictions require, therefore the written communication is irregular and generally at the request of PacifiCorp. Note: the standard offer Oregon QF PPA of this vintage does not allow termination of the contract if the commercial operation date (COD) is missed so there is limited enforcement available to the Company. Many of the updates have been provided verbally in telephone calls with the developer.

Please refer to Confidential Attachment CUB 11 for copies of all available written correspondence. Note: external and internal emails are not routinely saved but are automatically deleted in the normal course of business after 100 days unless deliberately saved by a user. PacifiCorp conducted an internal review of email communications related to QF PPA developer updates.

Confidential information is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

Confidential CUB Exhibit 305 is confidential and was submitted to each party designated to receive confidential information pursuant to Order 16-128.



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

November 8, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3389

**RE: Docket UE 307—2017 Transition Adjustment Mechanism – Net Power Cost
Indicative Update for 2017**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) encloses for filing the updated 2017 net power cost forecast for posting indicative transition adjustments. This filing is based on Order No. 16-418, granting the Company's Transition Adjustment Mechanism (TAM) application, as adjusted for avian curtailments, and subject to a final update.¹ This filing indicates a 2017 net power cost forecast of \$1,463.6 million on a total company basis. Based on this indicative forecast, Oregon-allocated net power costs are \$353.0 million. This is a decrease of approximately \$1.7 million (Oregon-allocated) from the August Update. In support of this filing, the following exhibits are attached:

- Exhibit A – Summary of updates since the August Update filing and impacts on net power costs.
- Exhibit B – Description of updates to net power costs and other TAM filing elements.
- Exhibit C – Attestation of Joseph Hoerner, in accordance with paragraph 13 of the Stipulation adopted by Order No. 10-363 (Docket UE 216) and paragraph 15 of the Stipulation adopted by Order No. 14-331 (Docket UE 287).
- Exhibit D – Updated Oregon allocation of net power costs.
- Exhibit E – Copy of the indicative transition adjustments and Schedule 201 rates posted on the Company's website November 8, 2016.

The Company has posted to Huddle the net power cost GRID project, report, and workpapers supporting this filing, as required by the TAM Guidelines. The confidential material is provided subject to the protective order issued in this proceeding.

Please direct questions about this filing to Natasha Siores at (503) 813-6583.

Sincerely,


R. Bryce Dalley
Vice President, Regulation

¹ *In the Matter of PacifiCorp, dba Pacific Power, 2017 Transition Adjustment Mechanism, Docket No. UE 307, Order No. 16-418 (Oct. 27, 2016).*

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Net Power Cost Indicative Update for 2017 in Docket UE 307 on the parties listed below via e-mail and Huddle in compliance with OAR 860-001-0180.

UE 307

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Dated this 8th day of November 2016.



Jennifer Angell
Supervisor, Regulatory Operations

Exhibit A

Summary of Updates Since the August Update Filing
and Impacts on Net Power Costs

Oregon TAM 2017 (April 2016 Initial Filing)	NPC (\$) =	1,566,031,929
	\$/MWh =	25.86

Oregon TAM 2016 (August 2016 Update Filing)	NPC (\$) =	1,553,390,530
	\$/MWh =	25.65

	Impact (\$)	NPC (\$)
Commission Order		
A01 - Remove NPC Impact of Avian Curtailment	(262,552)	
Updates		
U01 - Pipeline Updates	440,348	
U02 - QF Contract Status	(1,239,862)	
U03 - Mid Columbia Contracts Updates	(121,583)	
U04 - Gem State Contract	319,236	
U05 - Tri-State Updates	82,784	
U06 - EIM Benefits	1,530,213	
U07 - Official Forward Price Curve and Short Term Firm Transactions	(7,608,959)	
	Total Updates =	
	(6,860,376)	
	System balancing impact of all adjustments	
	166,773	
	Total Change from August 2016 Update Filing	
	(6,693,603)	
	Oregon TAM 2017 (November Indicative 2016 Filing)	
	NPC (\$) =	1,546,696,927
	\$/MWh =	25.54

EXHIBIT B

November 2016 Oregon Transition Adjustment Mechanism (TAM) Indicative
Update, Update Explanations

Exhibit B

**November 2016
Oregon Transition Adjustment Mechanism (TAM) Indicative Update
Update Explanations**

Updates to Net Power Costs

Ordered Adjustment 1 — Remove Avian Curtailment

The Oregon Public Utility Commission order on October 27, 2016, required the removal of lost energy from avian protection curtailment. The impact of this adjustment decreases net power cost by approximately \$65,000 on an Oregon allocated basis.

Update 1 — Gas Pipeline Tariff Updates

This update incorporates Gas Transmission Northwest updated rates for Hermiston. This update increases net power costs by approximately \$440,000 on a total-company basis. *Supporting document is at:
U01 GTN Gas Transmission Capacity Release Chevron to PacifiCorp dtd 8-1-16*

Update 2 -QF Contract Updates

The Company has incorporated the following QF contract changes (*Supporting documents are listed in italics*):

- Incorporated the 2017 pricing from the executed contract with Chevron Wind QF, Kennecott Refinery QF, Kennecott Smelter QF, Tesoro QF and Thayn Hydro QF.
U02 Chevron USA Inc 6.29.16 Casper Wind Project QF PPA 7.1.16-6.30-18 WY SCH 38 CONF
U02 Kennecott Refinery 9-23-16 Non-Firm QF PPA 2017 -UT CONF
U02 Kennecott Smelter 9-23-16 Non-Firm QF PPA 2017 - UT CONF
U02 Tesoro Refining 9-23-16 Non-Firm QF PPA 2017 - UT CONF
U02 Thayn Hydro 9-10-16 QF PPA effective 1-1-16 UT SCH 37 NON CONF
- Added new small qualifying facilities:
 - o Surprise Valley QF – a 3.7MW project in Oregon, with an online date of 09/01/2016. *U02 Surprise Valley 8.15.16 QF PPA OR SCH 37 NON CONF*
 - o Tooele Army Depot QF – a 3.2MW project in Utah, with an online date of 09/01/2016. *U02 Tooele Army Depot 5-10-16 QF PPA and 9-16-16Addendum 1 UT SCH 37 NON CONF*
- Based on status updates provided by the project developer, several projects expected online dates have been postponed:

	August Update	November Indicative
NorWest Energy 9 LLC (Pendleton)	11/30/2016	7/31/2018
OR Solar 2 LLC - Agate Bay	12/1/2016	7/30/2017
OR Solar 3 LLC - Turkey Hill	12/1/2016	3/15/2017
OR Solar 5 LLC - Merrill	12/1/2016	3/30/2017
OR Solar 6 LLC - Lakeview	12/1/2016	3/24/2017
OR Solar 7 LLC - Jacksonville	12/1/2016	7/30/2017
OR Solar 8 LLC - Dairy	12/1/2016	12/31/2018

Exhibit B

This update decreases total-company net power costs by approximately \$1.2 million.

Update 3.1 – Douglas Wells Proforma Update

Douglas PUD provided its preliminary estimate for the FY2017 Wells project cost on August 22, 2016. This update increases total-company net power costs by approximately \$51,000. *Supporting documents: U03 Douglas_PUD_8-22-17_2017_Wells_Budget_Update_Endur_20625[1]*

Update 3.2 – Grant Priest Rapids and Wanapum Proforma Update

Grant PUD provided its preliminary estimate for the 2017 Priest Rapids project cost on September 6, 2016. This update decreases total-company net power costs by approximately \$173,000. *Supporting documents: U03 Grand_PUD_Prelim_2017_Priest-Wanapum_Proforma_dtd_9-10-16[1]*

Update 4 – Gem State Budget

Idaho Falls provided the Gem State operating budget on September 8, 2016, for the fiscal year beginning October 1, 2016. This update increases total-company net power costs by approximately \$320,000. *Supporting document: U04 Idaho_Falls__9-8-16_Gem_State_Project_Final_Operating_Budget_for_FY_2017[1]*

Update 5 – Tri-State Purchase Contract Energy and Capacity Prices

This update reflects new capacity and energy rates for the Tri-State Generation and Transmission contract, per communication from Tri-State dated October 13, 2016. The Company also elected the capacity factor as 50 percent. This contract increases net power costs by approximately \$83,000 on a total-company basis. *Supporting document: U05 Tri-State_Corr_10-18-16_Capacity_and_Energy_Rates_for_2017_plus_Budget_Endur_20132[1]*
U05 Tri-State_8-4-16_Capacity_Factor_Ltr_Election_50%_for_2017[1]

Update 6 – EIM Results through August 2016

This update incorporates EIM benefit results from June through August 2016 in the forecasted benefits for EIM inter-regional imports and exports, as well as flexibility reserve diversity. This update increases total-company net power costs by approximately \$1.5 million. *Supporting calculations are provided in the Company's workpapers.*

Update 7 – October 31, 2016 Official Forward Price Curve and November 1, 2016 Short-Term Firm Transactions

This update incorporates the Company's official forward price curves as of October 31, 2016, and new wholesale short term firm transactions for electricity and natural gas, both physical and financial transactions, through November 1, 2016. The impact of this update decreases net power costs by approximately \$7.6 million on a total-company basis. *Supporting document: NovInd Cum ORTAM17_STF (161031) NOV16 CONF*

UE 323 / PacifiCorp
August 17, 2017
CUB Data Request 11

CUB Data Request 11

According to UE 323 – PAC/400/Wilding/400/34 at lines 17-18, QF “counterparties provide project status updates on a monthly basis that document progress toward milestones and the commercial operation date.” For the eighteen QF projects that were identified as delayed in CUB’s testimony (*see* CUB/100/Jenks/8) and the subject of CUB DR 9, please provide copies of the monthly status updates provided to PacifiCorp by the counterparties. Rather than providing a summary of monthly updates, please provide the updates themselves.

Response to CUB Data Request 11

The Company objects to this request as overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, the Company responds as follows:

The standard offer Oregon qualifying facility (QF) power purchase agreement (PPA) does not contain language that requires the QF to deliver a monthly progress report like the Company’s other jurisdictions require, therefore the written communication is irregular and generally at the request of PacifiCorp. Note: the standard offer Oregon QF PPA of this vintage does not allow termination of the contract if the commercial operation date (COD) is missed so there is limited enforcement available to the Company. Many of the updates have been provided verbally in telephone calls with the developer.

Please refer to Confidential Attachment CUB 11 for copies of all available written correspondence. Note: external and internal emails are not routinely saved but are automatically deleted in the normal course of business after 100 days unless deliberately saved by a user. PacifiCorp conducted an internal review of email communications related to QF PPA developer updates.

Confidential information is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.

Exhibit B

System balancing impact of all adjustments

This update recalculates net power costs based on the inclusion of the correction and updates 1 through 7, including the screening of gas-fired units. The combined impact of all updates decreases net power costs by approximately \$6.7 million on a total-company basis.

Oregon Situs Solar Projects

This update incorporates the Company's official forward price curves as of October 31, 2016. The impact of this update increases net power costs by approximately \$4,000 on an Oregon situs basis.

Updates to Non-Net Power Cost Items included in the TAM:

Please see page 1 of Exhibit D, lines 38 and 39 for the changes in the following TAM elements as described below.

Non-NPC EIM Costs

This update reflects a reduction in operations and non-NPC administrative costs. The impact of this update reduces the total TAM filing by approximately \$76,000 on an Oregon allocated basis.

Production Tax Credits

Production tax credits have been updated to reflect the change in production of the generating plants impacted by the removal of the avian curtailment adjustment. The impact of this update decreases the total TAM filing by approximately \$131,000 on an Oregon allocated basis.

Exhibit C

Attestation of Joseph Hoerner, In Accordance with Paragraph 13 of the Stipulation
Adopted by Order No. 10-363 (Docket UE 216) and Paragraph 15 of the
Stipulation Adopted by Order No. 14-331 (Docket UE 287)

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 307

In the Matter of
PACIFICORP d/b/a PACIFIC POWER,
2017 Transition Adjustment Mechanism.

ATTESTATION OF
JOSEPH P. HOERNER

1 STATE OF OREGON)
2)
3 County of Multnomah)

4 I, JOSEPH P. HOERNER, being first duly sworn on oath, depose and say:

5 1. My full name is Joseph P. Hoerner. I am employed by PacifiCorp. My
6 present position is Vice President, Energy Supply Management, for
7 PacifiCorp.

8 2. I am making this attestation in compliance with Paragraph 13 of the
9 stipulation adopted by the Public Utility Commission of Oregon in Order
10 No. 10-363 in docket UE 216 on September 16, 2010, and Paragraph 15 of the
11 stipulation adopted by the Commission in Order No. 14-331 on October 1,
12 2014.

13 3. I understand that this attestation will be filed concurrently with the Indicative
14 Filing of the Company's net power costs (NPC) on November 8, 2016.

15 4. I attest that all NPC contracts (a) executed before the contract lockdown date
16 of October 31, 2016, and (b) included in the 2017 TAM rate effective period,
17 are reflected in the Indicative Filing.

Exhibit D

Updated Oregon Allocation of Net Power Costs

**PacifiCorp
CY 2017 TAM
Production Tax Credits - Stand Alone TAM Adjustment
Indicative Update**

PTC Revenue Requirement in UE-263

Line.no	Plant Name	PTC Expiration Date	Total Company		Factor	Factors CY 2014	Oregon Allocated	
			UE-263 Final	Revenue Requirement			UE-263 Final	Revenue Requirement
1	JC Boyle	11/7/2015	\$ (103,599)		SG	26.053%	(26,991)	\$ (43,442)
2	Blundell Bottoming Cycle KWh	12/1/2017	(1,896,326)		SG	26.053%	(494,050)	(795,177)
3	Glenrock KWh	12/30/2018	(7,646,838)		SG	26.053%	(1,992,231)	(3,206,513)
4	Glenrock III KWh	1/16/2019	(2,861,406)		SG	26.053%	(745,482)	(1,199,860)
5	Goodnoe KWh	12/17/2017	(6,138,401)		SG	26.053%	(1,599,238)	(2,573,987)
6	High Plains Wind	10/14/2019	(7,115,510)		SG	26.053%	(1,853,804)	(2,983,713)
7	Leaning Juniper 1 KWh	9/13/2016	(7,025,884)		SG	26.053%	(1,830,454)	(2,946,131)
8	Marengo KWh	8/2/2017	(9,042,126)		SG	26.053%	(2,355,745)	(3,791,592)
9	Marengo II KWh	6/25/2018	(4,306,194)		SG	26.053%	(1,121,893)	(1,805,696)
10	McFadden Ridge	10/31/2019	(1,979,446)		SG	26.053%	(515,705)	(830,032)
11	Seven Mile KWh	12/30/2018	(8,040,700)		SG	26.053%	(2,094,844)	(3,371,669)
12	Seven Mile II KWh	12/30/2018	(1,583,828)		SG	26.053%	(412,635)	(664,139)
13	Dunlap I Wind KWh	9/29/2020	(8,132,932)		SG	26.053%	(2,118,873)	(3,410,344)
14								
15	Total Production Tax Credit		\$ (65,873,189)				\$ (17,161,943)	\$ (27,622,295)

\$ Change due to load variance from UE-263 forecast¹ \$ 536,921
CY 2017 PTC in Rates \$ (27,085,374)

PTC Revenue Requirement CY 2017 - Indicative Update

Line.no	Plant Name	PTC Expiration Date	Total Company		Factor	Factors CY 2017	Oregon Allocated	
			UE-263 Final	Revenue Requirement			UE-263 Final	Revenue Requirement
23	JC Boyle	11/7/2015			SG	25.230%		
24	Blundell Bottoming Cycle KWh	12/1/2017	(1,642,252)		SG	25.230%	(414,346)	(666,893)
25	Glenrock KWh	12/30/2018	(7,646,838)		SG	25.230%	(1,929,323)	(3,105,262)
26	Glenrock III KWh	1/16/2019	(2,861,406)		SG	25.230%	(721,942)	(1,161,972)
27	Goodnoe KWh	12/17/2017	(5,991,082)		SG	25.230%	(1,511,570)	(2,432,885)
28	High Plains Wind	10/14/2019	(7,115,510)		SG	25.230%	(1,795,267)	(2,889,498)
29	Leaning Juniper 1 KWh	9/13/2016			SG	25.230%		
30	Marengo KWh	8/2/2017	(5,447,249)		SG	25.230%	(1,374,359)	(2,212,043)
31	Marengo II KWh	6/25/2018	(4,306,194)		SG	25.230%	(1,086,467)	(1,748,678)
32	McFadden Ridge	10/31/2019	(1,979,446)		SG	25.230%	(499,421)	(803,822)
33	Seven Mile KWh	12/30/2018	(8,040,700)		SG	25.230%	(2,028,696)	(3,265,203)
34	Seven Mile II KWh	12/30/2018	(1,583,828)		SG	25.230%	(399,605)	(643,168)
35	Dunlap I Wind KWh	9/29/2020	(8,132,932)		SG	25.230%	(2,051,966)	(3,302,657)
36								
37	Total Production Tax Credit		\$ (54,747,437)				\$ (13,731,523)	\$ (22,232,082)
38								
39								
40								
41								

Increase Absent Load Change 5,390,213
Increase Including Load Change 4,853,292

Notes: ¹ Precise adjustment based on rates developed for reply proposal. Differs from estimated load variance amount in filed case of \$546,184 by \$9,263.

**PacifiCorp
CY 2017 TAM
Other Revenues - Stand Alone TAM Adjustment
Indicative Update**

Line no	Total Company				Oregon Allocated			
	UE-296 Final	CY 2017 Initial	CY 2017 Reply	CY 2017 Indicative	UE-296 Final	CY 2017 Initial	CY 2017 Reply	CY 2017 Indicative
1	(9,811,103)	(9,749,394)	(9,749,394)	(9,749,394)	(2,498,269)	(2,459,805)	(2,459,805)	(2,459,805)
2	(904,184)	(900,686)	(905,359)	(905,359)	(230,239)	(227,246)	(228,425)	(228,425)
3	(4,691,490)	-	-	-	(1,194,627)	-	-	-
4	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-
7	(15,406,778)	(10,650,079)	(10,654,753)	(10,654,753)	(3,923,135)	(2,687,051)	(2,688,230)	(2,688,230)
8								
9								
10								
11								
12								
13								
14								
15								

Decrease (Increase) in Other Revenues Absent Load Change 1,236,084 1,234,905 1,234,905

Baseline Other Revenues in Rates (3,923,135)

\$ Change due to load variance from UE 296 CY 2016 forecast 67,809

Other Revenues in Rates using 2017 load forecast (3,855,326)

Decrease (Increase) in Other Revenues Including Load Change 1,168,275 1,167,096 1,167,096

Exhibit E

Copy of the Indicative Transition Adjustments and Schedule 201 Rates
Posted on the Company's Website November 8, 2016

PACIFIC POWER
STATE OF OREGON
Schedule 201 Rates to be Effective January 1, 2017 through UE 307 TAM
INDICATIVE

Delivery Service Schedule	Rate Block/ Lamp Type	Schedule 201 Rates			
		Secondary	Primary	Transmission	
4	1st Block (≤1,000 kWh)	2.627		per kWh	
	2nd Block (>1,000 kWh)	3.588		per kWh	
23	1st 3,000 kWh	2.910	2.818	per kWh	
	All Addl kWh	2.158	2.091	per kWh	
28	1st 20,000 kWh	2.845	2.739	per kWh	
	All Addl kWh	2.767	2.666	per kWh	
30	1st 20,000 kWh	3.041	3.008	per kWh	
	All Addl kWh	2.637	2.600	per kWh	
41	Wint 1st 100kWh/kW	4.063	3.930	per kWh	
	Wint All Addl kWh	2.768	2.681	per kWh	
	Summer kWh	2.768	2.681	per kWh	
47/48	On-Peak kWh	2.682	2.487	2.337 per kWh	
	Off-Peak kWh	2.632	2.437	2.287 per kWh	
15		2.193			
	MV 7,000L	\$1.67		per lamp	
	MV 21,000L	\$3.77		per lamp	
	MV 55,000L	\$9.04		per lamp	
	HPS 5,800L	\$0.68		per lamp	
	HPS 22,000L	\$1.86		per lamp	
	HPS 50,000L	\$3.86		per lamp	
50		1.810			
	MV 7,000L	\$1.38		per lamp	
	MV 21,000L	\$3.11		per lamp	
	MV 55,000L	\$7.46		per lamp	
51		2.849			
	LED 4,000L/100 W(comp)	\$0.54		per lamp	
	LED 6,200L/150 W(comp)	\$0.77		per lamp	
	LED 13,000L/250 W(comp)	\$1.45		per lamp	
	LED 16,800L/400 W(comp)	\$1.97		per lamp	
	HPS 5,800L/70W	\$0.88		per lamp	
	HPS 9,500L/100W	\$1.25		per lamp	
	HPS 16,000L/150W	\$1.82		per lamp	
	HPS 22,000L/200W	\$2.42		per lamp	
	HPS 27,500L/250W	\$3.28		per lamp	
	HPS 50,000L/400W	\$5.01		per lamp	
	MH 12,000L/175W	\$1.94		per lamp	
	MH 19,500L/250W	\$2.68		per lamp	
	52	Dusk to Dawn	2.180		per kWh
		Dusk to Midn.	2.180		per kWh
53		0.930			
	HPS 5,800L/70W	\$0.29		per lamp	
	HPS 9,500L/100W	\$0.41		per lamp	
	HPS 16,000L/150W	\$0.60		per lamp	
	HPS 22,000L/200W	\$0.79		per lamp	
	HPS 27,500L/250W	\$1.07		per lamp	
	HPS 50,000L/400W	\$1.64		per lamp	
	MH 9,000L/100W	\$0.36		per lamp	
	MH 12,000L/175W	\$0.63		per lamp	
	MH 19,500L/250W	\$0.87		per lamp	
	MH 32,000L/400W	\$1.39		per lamp	
	MH 107,800L/1,000W	\$3.29		per lamp	
	Non-Listed	0.930		per kWh	
	54	All kWh	1.603		per kWh

PACIFIC POWER
STATE OF OREGON

One-Year Option - Transition Adjustments (cents/kWh)
November 2016 Indicative Transition Adjustments

	23/723 Secondary		23/723 Primary		28/728 Secondary		28/728 Primary		30/730 Secondary	
	HLH	LLH	HLH	LLH	HLH	LLH	HLH	LLH	HLH	LLH
Jan-17	-0.237	-0.151	-0.929	-0.509	-0.087	-0.296	-0.213	-0.427	-0.177	-0.420
Feb-17	0.911	1.737	1.754	-0.223	1.087	-0.055	0.840	-0.179	0.907	-0.184
Mar-17	0.246	0.266	-0.130	0.082	0.332	0.295	0.049	0.201	0.184	0.216
Apr-17	0.445	0.601	0.694	0.638	0.502	0.985	0.419	0.865	0.364	0.537
May-17	0.761	0.828	0.277	0.623	0.856	1.080	0.486	0.942	0.718	0.955
Jun-17	0.254	0.904	-0.450	0.737	0.293	1.005	0.189	0.749	0.205	0.873
Jul-17	-0.949	0.072	-0.477	-0.219	-0.838	0.219	-0.901	0.229	-0.977	0.093
Aug-17	0.721	2.544	0.250	-0.572	0.677	-0.361	0.725	-0.582	0.688	-0.478
Sep-17	-0.159	-0.731	-0.481	-0.106	-0.236	0.151	-0.307	-0.245	-0.323	0.036
Oct-17	-0.379	-0.134	-0.528	-0.402	-0.281	-0.302	-0.375	-0.460	-0.413	-0.406
Nov-17	-0.790	-0.882	-0.933	-0.464	-0.706	-0.224	-0.779	-0.429	-0.841	-0.382
Dec-17	-0.837	-0.739	-1.062	-0.660	-0.803	-0.493	-0.957	-0.657	-0.903	-0.624

	30/730 Primary		41/741 Secondary		41/741 Primary		47/747,48/748 Secondary		47/747,48/748 Primary	
	HLH	LLH	HLH	LLH	HLH	LLH	HLH	LLH	HLH	LLH
Jan-17	-0.307	-0.469					-0.786	-0.458	-0.353	-0.639
Feb-17	0.798	-0.243					1.652	-0.327	0.782	-0.412
Mar-17	0.178	0.098					-0.048	0.104	-0.032	-0.028
Apr-17	0.359	0.828	0.640	0.931	0.565	0.855	0.295	0.846	0.123	0.346
May-17	0.665	0.915	0.569	0.922	0.494	0.846	0.714	0.735	0.475	0.475
Jun-17	0.164	0.831	0.129	0.548	0.054	0.473	-0.335	0.730	-0.029	0.641
Jul-17	-0.996	0.076	-0.899	-0.036	-0.974	-0.112	-0.965	-0.166	-1.213	-0.152
Aug-17	0.688	-0.479	-0.245	-0.280	-0.320	-0.355	-0.187	-0.465	0.455	-0.672
Sep-17	-0.361	0.008	-0.278	-0.005	-0.353	-0.080	-0.206	0.002	-0.537	-0.247
Oct-17	-0.442	-0.480	-0.368	-0.303	-0.443	-0.378	-0.473	-0.449	-0.674	-0.609
Nov-17	-0.836	-0.432					-0.976	-0.270	-1.043	-0.620
Dec-17	-0.965	-0.665					-1.156	-0.791	-1.203	-0.819

	47/747,48/748 Transmission		51/751		52/752		53/753		54/754	
	HLH	LLH	HLH	LLH	HLH	LLH	HLH	LLH	HLH	LLH
Jan-17	-0.457	-0.684	-0.039	-0.245	-0.718	-0.925	-1.997	-2.203	-1.308	-1.515
Feb-17	0.706	-0.456	1.139	-0.024	0.460	-0.703	-0.819	-1.982	-0.130	-1.293
Mar-17	-0.100	-0.289	0.352	0.362	-0.327	-0.317	-1.606	-1.596	-0.917	-0.908
Apr-17	0.046	0.277	0.540	0.758	-0.139	0.078	-1.418	-1.200	-0.730	-0.512
May-17	0.380	0.410	0.856	0.880	0.176	0.201	-1.102	-1.078	-0.414	-0.390
Jun-17	-0.105	0.545	0.344	1.013	-0.335	0.334	-1.614	-0.945	-0.925	-0.256
Jul-17	-1.216	-0.171	-0.795	0.274	-1.475	-0.405	-2.753	-1.684	-2.065	-0.995
Aug-17	0.699	-0.634	1.062	-0.184	0.383	-0.863	-0.896	-2.142	-0.207	-1.453
Sep-17	-0.414	-0.280	0.002	0.157	-0.677	-0.522	-1.956	-1.801	-1.267	-1.112
Oct-17	-0.735	-0.679	-0.314	-0.223	-0.994	-0.902	-2.272	-2.181	-1.584	-1.492
Nov-17	-1.067	-0.638	-0.677	-0.199	-1.357	-0.878	-2.635	-2.157	-1.947	-1.468
Dec-17	-1.188	-0.822	-0.724	-0.390	-1.403	-1.069	-2.682	-2.348	-1.993	-1.659

PACIFIC POWER
STATE OF OREGON

**Three-Year Option - Transition Adjustments (cents/kWh)
For Customers Electing Option During the November 2016 Window
November 2016 Indicative Transition Adjustments**

Adjustments for Consumers Electing This Option for 2017-2019

	30/730 Secondary		30/730 Primary	
	HLH	LLH	HLH	LLH
2017	-0.031	0.047	-0.088	0.033
2018	-0.146	0.161	-0.210	0.143
2019	-0.413	0.010	-0.446	-0.008

	47/747, 48/748 Secondary		47/747, 48/748 Primary		47/747, 48/748 Transmission	
	HLH	LLH	HLH	LLH	HLH	LLH
2017	-0.094	0.041	-0.254	-0.199	-0.320	-0.294
2018	-0.346	-0.009	-0.410	-0.129	-0.452	-0.162
2019	-0.548	-0.204	-0.666	-0.255	-0.692	-0.287

PACIFIC POWER
STATE OF OREGON

**Five-Year Option - Transition Adjustments (cents/kWh) and
Consumer Opt-Out Charge (cents/kWh) For Customers Electing
Option During the November 2016 Window
November 2016 Indicative Transition Adjustments**

Adjustments for Consumers Electing This Option for Service Beginning January 1, 2017

Transition Adjustments (cents/kWh)

	730 Secondary	730 Primary	747, 748 Secondary	747, 748 Primary	747, 748 Transmission
2017	-0.129	-0.171	-0.162	-0.362	-0.424
2018	-0.149	-0.191	-0.182	-0.387	-0.448
2019	-0.096	-0.139	-0.130	-0.340	-0.404
2020	-0.193	-0.236	-0.227	-0.435	-0.495
2021	-0.301	-0.345	-0.335	-0.547	-0.605

Consumer Opt-Out Charge (cents/kWh)

	730 Secondary	730 Primary	747, 748 Secondary	747, 748 Primary	747, 748 Transmission
2017-2021	1.878	1.806	1.856	1.531	1.373