
BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision.

Docket No. UE-335

**REQUEST OF WALMART INC. AND
SAM'S WEST, INC. TO APPEAR
TELEPHONICALLY**

***EXPEDITED CONSIDERATION
REQUESTED***

On October 18, 2018, the Public Utility Commission of Oregon ("Commission") issued Notice of Oral Argument in this proceeding scheduling oral argument for November 6 at 1:30 p.m. Walmart Inc. and Sam's West, Inc. ("Walmart") requests permission from the Commission to appear telephonically for the oral argument scheduled for November 6. In support thereof, Walmart states as follows:

There remain five (5) issues to be decided by the Commission in this matter: (1) Open Access; (2) PGE's request to modify the existing Level III Storm accrual mechanism to allow negative as well as positive balances; (3) PGE's request to revise the normal weather assumption used in load forecasting by moving from a 15-year rolling average of historic temperatures to use of a trended weather assumption; (4) PGE's proposed changes to its existing decoupling mechanism, including (a) eliminating the Lost Revenue Recovery Adjustment ("LRRRA") and replacing it with the Sales Normalization Adjustment ("SNA"), (b) expanding use of decoupling by applying SNA to larger non-residential schedules, (c) removing the weather normalization adjustment from the SNA, and (d) allowing the carry forward to future years the adjustment amounts in excess of the current two percent limiter; and (5) PGE's proposal to include energy storage associated with renewable resources in tariff Schedule 122.

Of these five remaining issues, Walmart has taken a position on only one—the proposed changes to the decoupling mechanism. And with respect to that one issue, Walmart has taken a position on only one of the four (4) sub-issues— expanding decoupling by application of the SNA to Schedules 83 and 85. Given the limited nature of Walmart’s position, Walmart requests permission to appear at the November oral argument telephonically.

Walmart has conferred with the other parties in this matter. Portland General Electric (“PGE”), Staff, Oregon Citizens’ Utility Board (“CUB”), the Alliance of Western Energy Consumers (“AWEC”) and Fred Meyer stated that they have no objection to Walmart appearing telephonically.

Under the normal timing for motions and responses, responses must be filed within 15 days of the initiating motion. Fifteen days from today is November 6, the date of the oral argument. Thus, the Commission would not have time under the normal motion procedures to issue a timely decision. Therefore, Walmart requests expedited consideration of this motion.

DATED this 22nd day of October, 2018.

/s/ Vicki M. Baldwin

Vicki M. Baldwin
PARSONS BEHLE & LATIMER
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
vbaldwin@parsonsbehle.com
*Attorneys for Walmart Inc. and Sam’s West,
Inc.*

CERTIFICATE OF SERVICE

Docket No. UE 335

I hereby certify that on this 22nd day of October 2018, I caused to be served, a true and correct copy of the foregoing **REQUEST OF WALMART INC. AND SAM'S WEST, INC. TO APPEAR TELEPHONICALLY AND EXPEDITED TREATMENT** via electronic mail, to:

ALBERTSONS

BRIAN BETHKE 11555 DUBLIN CANYON ROAD	250 PARKCENTER BLVD BOISE ID 83706 brian.bethke@albertsons.com
--	--

CHRIS ISHIZU ALBERTSONS COMPANIES, INC.	250 PARKCENTER BLVD BOISE ID 83706 chris.ishizu@albertsons.com
---	--

GEORGE WAIDELICH ALBERTSONS COMPANIES' INC.	11555 DUBLIN CANYON ROAD PLEASANTON OR 94588 george.waidelich@albertsons.com
---	--

AWEC UE 335

BRADLEY MULLINS (C) MOUNTAIN WEST ANALYTICS	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 brmullins@mwanalytics.com
--	--

TYLER C PEPPLER (C) DAVISON VAN CLEVE, PC	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com
--	---

ROBERT SWEETIN (C) DAVISON VAN CLEVE, P.C.	185 E. RENO AVE, SUITE B8C LAS VEGAS NV 89119 rds@dvclaw.com
---	--

CALPINE SOLUTIONS

GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC	PO BOX 7218 BOISE ID 83702 greg@richardsonadams.com
--	---

GREG BASS CALPINE ENERGY SOLUTIONS, LLC	401 WEST A ST, STE 500 SAN DIEGO CA 92101 greg.bass@calpinesolutions.com
---	--

KEVIN HIGGINS (C) ENERGY STRATEGIES LLC	215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com
--	--

FRED MEYER

KURT J BOEHM (C)
BOEHM KURTZ & LOWRY

36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

JODY KYLER COHN (C)
BOEHM, KURTZ & LOWRY

36 E SEVENTH ST STE 1510
CINCINNATI OH 45202
jkylercohn@bkllawfirm.com

NIPPC

ROBERT D KAHN
NORTHWEST &
INTERMOUNTAIN POWER
PRODUCERS COALITION

PO BOX 504
MERCER ISLAND WA 98040
rkahn@nippc.org

IRION A SANGER (C)
SANGER LAW PC

1117 SE 53RD AVE
PORTLAND OR 97215
irion@sanger-law.com

MARK R THOMPSON (C)
SANGER LAW PC

1117 SE 53RD AVE
PORTLAND OR 97215
mark@sanger-law.com

**OREGON CITIZENS UTILITY
BOARD**

OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

MICHAEL GOETZ (C)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97205
mike@oregoncub.org

ROBERT JENKS (C)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
bob@oregoncub.org

PACIFICORP

PACIFICORP, DBA PACIFIC
POWER

825 NE MULTNOMAH ST, STE
2000
PORTLAND OR 97232
oregondockets@pacificorp.com

MATTHEW MCVEE
PACIFICORP

825 NE MULTNOMAH
PORTLAND OR 97232
matthew.mcvee@pacificorp.com

PORTLAND GENERAL ELECTRIC

PGE RATES & REGULATORY
AFFAIRS

PORTLAND GENERAL ELECTRIC
COMPANY
121 SW SALMON STREET,
1WTC0306
PORTLAND OR 97204
pge.opuc.filings@pgn.com

STEFAN BROWN (C)
PORTLAND GENERAL

121 SW SALMON ST, 1WTC0306
PORTLAND OR 97204

ELECTRIC	stefan.brown@pgn.com; pge.opuc.filings@pgn.com
DOUGLAS C TINGEY (C) PORTLAND GENERAL ELECTRIC	121 SW SALMON 1WTC1301 PORTLAND OR 97204 doug.tingey@pgn.com
SBUA	
JAMES BIRKELUND SMALL BUSINESS UTILITY ADVOCATES	548 MARKET ST STE 11200 SAN FRANCISCO CA 94104 james@utilityadvocates.org
DIANE HENKELS (C) CLEANTECH LAW PARTNERS PC	420 SW WASHINGTON ST STE 400 PORTLAND OR 97204 dhenkels@cleantechlaw.com
STAFF	
STEPHANIE S ANDRUS (C) PUC STAFF--DEPARTMENT OF JUSTICE	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us
MARIANNE GARDNER (C) PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 marianne.gardner@state.or.us
SOMMER MOSER (C) PUC STAFF - DEPARTMENT OF JUSTICE	1162 COURT ST NE SALEM OR 97301 sommer.moser@doj.state.or.us
WALMART	
VICKI M BALDWIN (C) PARSONS BEHLE & LATIMER	201 S MAIN ST STE 1800 SALT LAKE CITY UT 84111 vbaldwin@parsonsbehle.com
STEVE W CHRISS (C) WAL-MART STORES, INC.	2001 SE 10TH ST BENTONVILLE AR 72716-0550 stephen.chriss@wal-mart.com

/s/ Hailey Arvidson