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September 1, 2023

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, Oregon 97308-1088

Re: UE 420 – *In the Matter of PACIFICORP, dba PACIFIC POWER, 2024 Transition Adjustment Mechanism.*

Attention Filing Center:

Attached for filing in the above-referenced docket is PacifiCorp dba Pacific Power's Cross-Examination Statement and Motion for Leave to Present Live Testimony.

Please contact this office with any questions.

Sincerely,

Katherine McDowell

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 420

In the Matter of
PACIFICORP dba PACIFIC POWER,
2024 Transition Adjustment Mechanism.

**PACIFICORP’S CROSS-EXAMINATION
STATEMENT AND MOTION FOR
LEAVE TO PRESENT LIVE
TESTIMONY**

Cross-Examination Statement

In accordance with Administrative Law Judge (ALJ) Katharine Mapes’ April 24, 2023, Prehearing Conference Memorandum and August 3, 2023 Memorandum on Hearing Procedures, PacifiCorp dba Pacific Power (PacifiCorp or the Company) submits its Cross-Examination Statement to the Public Utility Commission of Oregon.

PacifiCorp plans to cross-examine the following witnesses:

Witness (Party)	Estimate	Questioning Counsel	Subject Matter
Bradley Mullins (AWEC)	60 min.	Adam Lowney	NPC Adjustments and Recommendations
Julie Jent (Staff)	30 min.	Adam Lowney	DA/RT and other NPC Adjustments
Rose Anderson (Staff)	30 min.	Katherine McDowell	NPC Adjustments and Recommendations

The cross-examination of Staff witness Rose Anderson may include confidential information, but PacifiCorp does not anticipate any cross-examination that would include highly confidential information. The confidential information, if any, will address coal supply agreements and is not expected to exceed 30 minutes. Katherine McDowell will be asking the questions and the persons qualified under the protective order that will attend the confidential session include the active participants listed below and Cathie Allen

(Cathie.Allen@pacificorp.com), David Webb (David.Webb@pacificorp.com), Faqiha Zahra (Faqiha.Zahra@pacificorp.com), Isiah Zacharia (Isaiah.Zacharia@pacificorp.com), Joe Dallas

(Joseph.Dallas@pacificorp.com), Eshwar Rao

(Eshwar.VyakarnaRajshekarRao@pacificorp.com), Rachel Perry (rachel@mrg-law.com) and

Skylar Sumner (skylar@mrg-law.com).

PacifiCorp's active participants for the hearing are listed below:

Participant	Role	Email
Katherine McDowell (PacifiCorp)	Counsel	katherine@mrg-law.com
Adam Lowney (PacifiCorp)	Counsel	adam@mrg-law.com
Ajay Kumar (PacifiCorp)	Counsel	ajay.kumar@pacificorp.com
Ramon Mitchell (PacifiCorp)	Witness	ramon.mitchell@pacificorp.com
James Owen (PacifiCorp)	Witness	james.owen@pacificorp.com
Matthew McVee (PacifiCorp)	Witness	matthew.mcvee@pacificorp.com
Ryan Fuller (PacifiCorp)	Witness	ryan.fuller@pacificorp.com
Judith Ridenour (PacifiCorp)	Witness	judith.ridenour@pacificorp.com
Zepure Shahumyan (PacifiCorp)	Witness	zepure.shahumyan@pacificorp.com
Michael Wilding (PacifiCorp)	Witness	michael.wilding@pacificorp.com

PacifiCorp reserves the right to ask follow-up questions of any witness who is cross-examined at the hearing by another party, the ALJ, or any Commissioner. Additionally, PacifiCorp reserves the right to supplement its cross-examination exhibits with additional discovery responses that are due after September 1, 2023.

Motion for Leave to Provide Live Testimony

PacifiCorp requests the opportunity to present live testimony at the hearing scheduled to begin on September 7, 2023, to respond to the new adjustment included in the revised rebuttal

testimony of Staff Witness Rose Anderson (Staff/1000, Anderson/17). Staff filed its revised rebuttal testimony on August 31, 2023—15 days after Staff filed its rebuttal testimony and one day after the Company submitted its surrebuttal testimony.

Staff claims that its revision was simply correcting the calculation of an adjustment related to the Washington Climate Commitment Act (CCA) and the associated greenhouse gas emissions allowances applicable to generation from the Company's Chehalis gas-fired plant. However, in re-quantifying the adjustment, Staff has dramatically changed the nature and extent of the adjustment in a way that was not understood by the Company when it prepared its surrebuttal testimony.¹ Staff's adjustment is now understood to remove all costs related to the CCA from the TAM, which is an entirely new position made clear only with Staff's August 31, 2023, filing. Not only has Staff's revision altered the scope of its recommendation, it also significantly increased the magnitude of the adjustment.

Staff provided no explanation for waiting until after the Company filed surrebuttal testimony to suddenly and materially revise its recommendation. By waiting until after the Company filed its last round of testimony, Staff precluded the Company from substantively responding to the new adjustment. To ensure an accurate and complete record and to ensure that the Company is provided an opportunity to respond to Staff's new adjustment, the Company requests the opportunity to present live testimony at the hearing scheduled to begin on September 7, 2023.

Company witness Matthew D. McVee will provide live testimony narrowly focused on Staff's new adjustment and will take approximately 10 minutes. The Company's request will therefore not delay the proceedings or unduly burden the record.

¹ See PAC/1000, McVee/2 (describing the Company's understanding of Staff's position).

Respectfully submitted this 1st day of September 2023.



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