

December 15, 2005

VIA HAND DELIVERY

Public Utility Commission of Oregon
Attention: Filing Center
550 Capitol Street NE #215
Salem, OR 97308-2148

Re: *UM 1002 — Wah Chang, Petitioner v. PacifiCorp, Respondent*
Wah Chang's Direct Testimony and Exhibits

Dear Sir or Madam:

Enclosed for filing are the original and five copies of Wah Chang's Direct Testimony and Exhibits, as follows:

- (1) Direct Testimony of Robert McCullough (WC/800) with accompanying Exhibits (WC/801 through WC/868).
- (2) Direct Testimony of Deborah J. Stare (WC/900) with accompany Exhibits (WC/901 through WC/907).
- (3) Transcripts of Depositions of PacifiCorp personnel (WC/1000 through WC/1010).
- (4) Other Exhibits (WC/1100 through WC/1129).
- (5) Certificate of Service of Wah Chang's Direct Testimony and Exhibits.

The exhibits accompanying the Direct Testimony of Deborah J. Stare consist of audio files and transcripts of PacifiCorp trader conversations that occurred in 2000–2001, and other documents. PacifiCorp has designated the conversations and other documents Confidential Pursuant to Protective Order 01-149 entered in this proceeding. Accordingly, Exhibits WC/901 through WC/907 are filed under seal.

PacifiCorp also has designated the enclosed deposition transcripts as Confidential Pursuant to the Protective Order. Accordingly, Exhibits WC/1000 through WC/1010 are also filed under seal.

PacifiCorp also has designated the following documents and information as Confidential Pursuant to Protective Order, and they are filed under seal also: WC/802,

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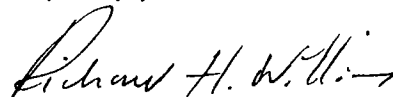
WC/805, WC/810, WC/815, WC/816, WC/842, WC/849, WC/856, W/C 857, WC/1108, WC/1118, WC/1119, WC/1121, WC/1122, WC/1123, WC/1126, WC/1127, WC/1128, and WC/1129.

Wah Chang reserves the right to contest PacifiCorp's designation of materials as Confidential Pursuant to the Protective Order.

Wah Chang is also filing under seal the Direct Testimony of Robert McCullough because parts of Mr. McCullough's testimony include information that PacifiCorp has designated as confidential. Given present time constraints, it is not feasible to prepare a redacted version of the testimony for enclosure with this letter. The following additional exhibits are filed under seal at Mr. McCullough's request: WC/806, WC/807, WC/809, WC/815, WC/823, WC/827, WC/834, WC/836, WC/840.

Consistent with Commission filing rules, I am also enclosing a compact disk containing electronic versions of the enclosed testimony and exhibits, other than the testimony and exhibits filed under seal.

Very truly yours,



Richard H. Williams

Enclosures

cc (by hand delivery): Honorable Traci Kirkpatrick (*w/o encls*)
Mr. Paul Graham/Mr. Jason Jones
Mr. Lawrence Reichman
Mr. Paul Wrigley

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bcc (w/encs): Mr. James H. Denham
Mr. Robert F. McCullough, Jr.
Mr. Berne Martin Howard

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

UM 1002

Wah Chang,

v.

PacifiCorp,

Petitioner,)
)
)
)
Respondent.)

**CERTIFICATE OF SERVICE OF
WAH CHANG'S DIRECT
TESTIMONY AND EXHIBITS**

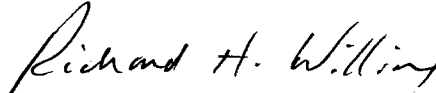
I certify that I have this day served the documents listed in the Attachment, consisting of six pages, to this certificate, constituting Wah Chang's Direct Testimony and Exhibits, upon all parties of record in this proceeding, by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-013-0070, to the following parties or attorneys of parties:

1 **CONFIDENTIAL**
2 PAUL GRAHAM
3 JASON JONES
4 DEPARTMENT OF JUSTICE
5 REGULATED UTILITY &
6 BUSINESS SECTION
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Dated at Portland, Oregon, this 15th day of December, 2005.



Richard H. Williams, OSB No. 72284
Of Attorneys for Petitioner Wah Chang

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON
UM 1002**

**Wah Chang, Petitioner v.
PacifiCorp, Respondent**

WAH CHANG'S DIRECT TESTIMONY AND EXHIBITS

Exhibit 800 series: Testimony of Robert F. McCullough, Jr., and accompanying Exhibits:

Ex. No.	Description	Confidential
WC/800	Testimony of Robert F. McCullough, Jr.	Yes
WC/801	Curriculum Vitae of Robert F. McCullough, Jr.	No
WC/802	E-mail from Todd Carpenter to Gary Eldridge et al., re Swift ET, "flipping" at COB, dated June 24, 2000	Yes
WC/803	Enron Inc Sheets (on disk)	No
WC/804	20000522 Ricochet	No
WC/805	PacifiCorp Trading Information	Yes
WC/806	Tim Belden Presentation re Western Power Markets	Yes
WC/807	Enron Trading Hub Correlation Matrix	Yes
WC/808	Death Star Templates (on disk)	No
WC/809	Prepared Initial Tape Testimony of Barry E. Sullivan Witness for the Staff of FERC	Yes
WC/810	E-mail from Gary Eldridge re Seattle Scheduler Meeting Notes-- #2, dated May 18, 2005	Yes
WC/811	Enron Record of Transaction	No
WC/812	Conversation between Les at Enron and Harry of City of Redding	No
WC/813	City of Redding Conversations	No
WC/814	E-mail from Tim Belden to Greg Piper, dated May 12, 2000	No
WC/815	E-mail from Tim Belden re "Out of Market", Dated May 23, 2000	Yes
WC/816	2005 Discovery Buy/Resales by Month	Yes
WC/817	RESERVED	N/A
WC/818	Docket No. EL03-159-000, Ex. No. MID-4	No
WC/819	City of Redding Conversations	No

Ex. No.	Description	Confidential
WC/820	Yoder-Hall Memo dated December 8, 2000	No
WC/821	City of Redding Conversations	No
WC/822	Tim Belden Presentation August 5, 2000	No
WC/823	City of Redding Conversations	Yes
WC/824	Tim Belden E-mails (on disk)	No
WC/825	RESERVED	N/A
WC/826	Christian Yoder E-Mail	No
WC/827	Presentation by Tim Belden, dated March 25, 2001	Yes
WC/828	Bill Williams Enron E-mail, dated April 17, 2001	No
WC/829	Steve C. Hall E-mail Attaching Draft Memorandum re Trading Strategies, dated November 14, 2000	No
WC/830	Kim Ward (Enron) E-mail dated May 4, 2001	No
WC/831	RESERVED	N/A
WC/832	Enron Buy-Resales	No
WC/833	RESERVED	N/A
WC/834	Bill Williams (Enron E-mail), dated August 30, 2001	Yes
WC/835	RESERVED	N/A
WC/836	Reliant Trader Conversations, dated June 19, 2000; June 20, 2000; June 21, 2000; and June 23, 2000	Yes
WC/837	Testimony of Ann M. Hatcher on Behalf of Silicon Valley Power in FERC Dockets	No
WC/838	Stanley Cocke (Enron) E-mail dated July 13, 2001	No
WC/839	Order on Complaint Utah Associated Municipal Power Systems Docketed June 29, 1998	No
WC/840	David Pierce (Enron E-mail), dated November 12, 2000	Yes
WC/841	Letter from Harvey L. Reiter to Donald Gelinias, with attached Affidavit of Arlen Orchard, dated May 22, 2002	No
WC/842	2005 Discovery Buy Resell by Counterparty	Yes
WC/843	RESERVED	N/A
WC/844	PacifiCorp/Enron Buy Sells by Month	No
WC/845	Enron E-mail to Portland Shift re Project Red Congo	No
WC/846	Handwritten Notes	No

Ex. No.	Description	Confidential
WC/847	Index of Relevant Material and E-mail from Paul Cummings	No
WC/848	Agreement and Stipulation in FERC Docket re City of Redding, CA	No
WC/849	Exhibit 8A, 8B and 8C to Affidavit of Stanley K. Watters May 22, 2000	Yes
WC/850	Chart of November 6, 2000 Modesto Buy/Resells ("767" data)	Yes
WC/851	Chart Describing November 6, 2000 Death Star	No
WC/852	Enron May 6 Data Request Supplemental Dated November 15, 2002	No
WC/853	PacifiCorp Overscheduling	No
WC/854	Driscoll's Final Procedures & Forney's Perpetual Loop	No
WC/855	Empower records of Death Stars with PacifiCorp	No
WC/856	Audio File Names for Some Buy/Resell Conversations	Yes
WC/857	Accomplishments of Michael Driscoll—year end 2000	Yes
WC/858	July 1, 2000 Death Star (Deal Comments)	No
WC/859	July 1, 2000 Empower and Inc Sheet	No
WC/860	August 19, 2000 Death Star	No
WC/861	November 27, 2000 Aquila Transaction	No
WC/862	Enron Ricochet Counterparties	No
WC/863	Statement of Terry Winter before Congress, July 22, 2002	No
WC/864	Attachment I.K.1 to PGE Affidavit Filed in FERC Docket No. PA02-2-000	No
WC/865	RESERVED	N/A
WC/866	Transcript of Scheduler Telephone Conversation, April 26, 2000	No
WC/867	August 23, 2000 ISO Interchange Data from Hildebrandt	No
WC/868	August 23, 2000 CAPS Supplemental Bids	No

Exhibit 900 series: Testimony of Deborah J. Stare and accompanying Exhibits:

Ex. No.	Description	Confidential
WC/900	Testimony of Deborah J. Stare	No
WC/901	Transcript of PacifiCorp Trader Conversations Submitted to FERC, with Notations	Yes
WC/902	Excel Spreadsheet Containing Hyperlinks to Audio Files of	Yes

	Trader Conversations Submitted to FERC and Cross-References to Transcript of FERC Submitted Conversations (WC/901) -- (on CD)	
WC/903	Transcripts of PacifiCorp Trader Conversations Selected through Wah Chang Listening Project	Yes
WC/904	Excel Spreadsheet Prepared by McCullough Research of Selected Audio Files from Wah Chang's Listening Project and Corresponding Transcripts (on CD)	Yes
WC/905	PC 075269 – Produced by PacifiCorp as Attachment 155 in Response to Wah Chang Data Requests -- (on CD)	Yes
WC/906	PC 018963 – Produced by PacifiCorp as Attachment 99 in Response to Wah Chang Data Requests -- (on CD)	Yes
WC/907	Real-Time Blotters (PC 019435 through PC 027756) Produced by PacifiCorp as Attachment 92 in Response to Wah Chang Data Requests (on DVD)	Yes

Exhibit 1000 series: Transcripts of Depositions of PacifiCorp personnel:

Ex. No.	Description	Confidential
WC/1000	Deposition Testimony of Greg Maxfield, taken October 17, 2005	Yes
WC/1001	Deposition Testimony of Valarie Sabo, taken October 24, 2005	Yes
WC/1002	Deposition Testimony of David Kvamme, taken October 24, 2005	Yes
WC/1003	Deposition Testimony of Jim Portouw, taken November 15, 2005	Yes
WC/1004	Deposition Testimony of John Apperson, taken November 15, 2005	Yes
WC/1005	Deposition Testimony of Paul Kroger, taken November 16, 2005	Yes
WC/1006	Deposition Testimony of Marlin Green, taken November 16, 2005	Yes
WC/1007	Deposition Testimony of Todd Carpenter, taken November 21, 2005	Yes
WC/1008	Deposition Testimony of John Rogers, taken November 21, 2005	Yes
WC/1009	Deposition Testimony of Stanley Watters, taken November 29, 2005	Yes
WC/1010	Deposition Testimony of Gary Eldridge, taken November 30, 2005	Yes

Exhibit 1100 series: Other Exhibits:

Ex. No.	Description	Confidential
WC/1100	Timothy M. Belden Plea Agreement, filed October 17, 2002	No
WC/1001	John M. Forney Plea Agreement, filed August 5, 2004	No
WC/1002	Jeffrey S. Richter Plea Agreement, filed February 4, 2003	No
WC/1103	Letter from Roy Hemmingway to The Honorable Patrick Wood, dated April 17, 2003	No
WC/1104	WITHDRAWN	
WC/1105	Order on Complaint Utah Associated Municipal Power Systems v. PacifiCorp, Docket No. EL 98-32-00 83 FERC ¶ 61, 337, issued June 29, 1998	No
WC/1106	Request for Rehearing and Clarification of PacifiCorp PacifiCorp v. Reliant Energy Services, Inc. (Docket No. EL02-80-00) Morgan Stanley Capital Group, Inc., (Docket No. EL 02-81-00) Williams Energy Marketing & Trading Company, (Docket No. EL 02-82-00), and El Paso Merchant Energy, L.P. (Docket NO. EL 02-83-00) July 29, 2002	No
WC/1107	E-mail from JMF to Portland Shift re Project Red Congo Document number ECf000227557	No
WC/1108	Letter from Edward Silliere of Dow Jones to "Gentlemen" RE: Guidelines for Participants, California-Oregon Border (COB) Electricity Price Index, dated February 1, 1995	Yes
WC/1109	ISO Market Monitoring & Information Protocol Issued by Roger Smith on October 13, 2000	No
WC/1110	Response of PacifiCorp to the FERC's Data Request, dated May 21, 2002 Affidavit of Stanley K. Watters on behalf of PacifiCorp	No
WC/1111	PacifiCorp's Response to Petitioner's 7th Data Request	No
WC/1112	PacifiCorp's Response to Petitioner's 9th Data Request	No
WC/1113	PacifiCorp's Response to Petitioner's 10th Data Request	No
WC/1114	PacifiCorp's Response to Petitioner's 12th Data Request	No
WC/1115	PacifiCorp's Response to Petitioner's 13th Data Request	No

Ex. No.	Description	Confidential
WC/1116	PacifiCorp's Response to Petitioner's 14th Data Request	No
WC/1117	<i>Electric Times</i> Articles	No
WC/1118	Supplemental Response of PacifiCorp to FERC's Data Request, dated May 21, 2002 Supplemental Affidavit of Stanley K. Watters on Behalf of PacifiCorp	Yes
WC/1119	Exhibit 2 to PacifiCorp's Response to FERC's Data Request, dated May 21, 2002	Yes
WC/1120	RESERVED	N/A
WC/1121	E-mail: <ul style="list-style-type: none"> • July 6, 2000, from Terry Hudgens to Stan Watters et al. re Cal ISO • September 8, 2000, from Keith Johnson to Alan Richardson et al. re Energy market Report—09/07/00 • March 20, 2001, from Keith Johnson to Alan Richardson et al. re Energy Market Report—03/19/01 • May 25, 2001, from Steven Wallace to Cory Anderson et al. re Downward Price Pressure • June 25, 2001, from John Apperson to Jim Portouw et al. re Effect of FERC Price Cap Order on Fundamentals • July 9, 2001, from Nathalie Wessling to Cory Anderson et al. re July 9 Bloomberg Power Lines Report • August 10, 2001 from Rob Goodman to Jean Wilson et al. re Scheduling Stateline 	Yes
WC/1122	Attachment 126(b) to PacifiCorp Data Response	Yes
WC/1123	List of PacifiCorp Traders and Organizational Chart	Yes
WC/1124	RESERVED	N/A
WC/1125	Attachment 75 to PacifiCorp Data Response	No
WC/1126	Attachment 76 to PacifiCorp Data Response	Yes
WC/1127	PacifiCorp Response to Oregon Department of Justice Civil Investigative Demand, February 19, 2003	Yes
WC/1128	PacifiCorp Response to FBI Subpoena, September 17, 2002	Yes
WC/1129	OPUC Staff Request to PacifiCorp, October 24, 2003 PacifiCorp Response, November 12, 2003	Yes