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June 1, 2017

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 1824 – Oregon Investigation into PacifiCorp’s Oregon-Specific Cost Allocation Issues

PacifiCorp d/b/a Pacific Power encloses for filing its objection to Imperial Irrigation District’s petition to intervene in the above-referenced proceeding.

If you have questions about this filing, please contact Natasha Siores at (503) 813-6583.

Sincerely,

A handwritten signature in black ink, appearing to read "Etta Lockey". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Etta Lockey
Vice President, Regulation

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1824

In the Matter of the Public Utility
Commission of Oregon Investigation into
PacifiCorp, d/b/a Pacific Power's Oregon-
Specific Cost Allocation Issues.

**PACIFICORP'S OBJECTION TO
IMPERIAL IRRIGATION DISTRICT'S
PETITION TO INTERVENE**

I. INTRODUCTION

The Public Utility Commission of Oregon (Commission) opened this docket to analyze Oregon-specific issues related to the inter-jurisdictional allocation of costs by PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company). On May 22, 2017, Imperial Irrigation District (IID), a California public power utility, petitioned to intervene. PacifiCorp objects to IID's intervention because IID does not meet the requirements to appear and participate in this case under ORS 756.525(2) and OAR 860-001-0300(6). IID lacks a sufficient interest in this docket, its participation will broaden the issues, burden the record, and delay the proceeding, and it has no special knowledge or expertise that will aid the Commission in resolving the issues.

II. BACKGROUND

PacifiCorp provides retail electric service in six jurisdictions. In Oregon, PacifiCorp allocates its system costs among these jurisdictions under the 2017 Protocol, which was developed in the Multi-State Process (MSP).¹ In Order No. 17-124, the Commission extended the 2017 Protocol for an additional year and opened "a separate investigation into PacifiCorp's

¹ *In the Matter of PacifiCorp, dba Pacific Power, Petition for Approval of the 2017 PacifiCorp Inter-Jurisdictional Allocation Protocol*, Docket No. UM 1050, Order No. 17-124 at 1 (Mar. 29, 2017).

inter-jurisdictional allocation to conduct additional analyses to focus on Oregon-specific issues.”² The Commission opened Docket No. UM 1824 for this investigation on March 27, 2017.

The Commission’s goal for this docket is to “explore allocation approaches consistent with cost-causation principles that are reasonable for Oregon customers,” while continuing to participate in the MSP.³ The Commission directed its Staff to conduct workshops to “identify key Oregon-specific issues, including potential allocation options to consider and unique allocation issues stemming from SB 1547,”⁴ which requires PacifiCorp to cease providing coal-generated electricity in Oregon by 2035. Finally, the Commission expressed its expectation and intent that this Oregon-specific investigation would culminate in a long-term Oregon resolution of key underlying issues, such as use of a rolled-in method of allocation and issues related to SB 1547.⁵

On May 22, 2017, the IID petitioned to intervene in this docket.⁶ IID is a public power utility located in El Centro, California, organized under the California Irrigation District Law.⁷ IID provides electric and water service to approximately 150,000 customers.⁸ IID states that its interest in this proceeding is “in the regional development of renewable electricity resources,” and that it has participated and sought to participate in related proceedings before the California Energy Commission and the California Public Utilities Commission.⁹ IID intends to address

² Order No. 17-124 at 3–4.

³ Order No. 17-124 at 4.

⁴ Order No. 17-124 at 4.

⁵ Order No. 17-124 at 5.

⁶ Petition to Intervene of Imperial Irrigation District (IID) (hereinafter, Petition) (May 22, 2017).

⁷ Petition at 1–2.

⁸ Petition at 2.

⁹ Petition at 2.

“cost issues,” “separation issues if they are raised,” and “changes to the 2017 protocol.”¹⁰ Without explanation, IID claims that it has “extensive experience in the relevant issues, having operated as a public power utility since 1936.”¹¹

III. ARGUMENT

To intervene, a petitioner must have a “sufficient interest in the proceedings” and its participation must not “unreasonably broaden the issues, burden the record, or delay the proceedings.”¹² IID does not meet this standard.

A. IID lacks a sufficient interest in this Oregon-specific proceeding.

The Commission requires interveners to articulate a “stake in the outcome” of a proceeding.¹³ The Commission has declined to permit intervention where an entity represented neither the utility nor its customers and asserted no clear interest in the outcome of the case.¹⁴

IID asserts “a substantial interest in the regional development of renewable electricity.”¹⁵ IID does not indicate how or why its interest in renewable energy gives it a stake in the outcome of this proceeding, which addresses Oregon-specific issues related to PacifiCorp’s cost allocation.¹⁶ IID is not a customer of PacifiCorp, nor does it represent customers of PacifiCorp. IID has not alleged how it is impacted by PacifiCorp’s service in Oregon. Therefore, IID has not demonstrated a stake in the outcome of this proceeding.

¹⁰ Petition at 2.

¹¹ Petition at 3.

¹² OAR 860-001-0300(6).

¹³ *In the Matter of Fish Mill Lodges Water System Application for an Order Authorizing Abandonment of Water Service*, Docket No. UM 1489, Order No. 11-179 at 2 (May 31, 2011).

¹⁴ Order No. 11-179 at 2.

¹⁵ Petition at 2.

¹⁶ Order No. 17-124 at 4.

In a previous case, the Commission denied the intervention of one of PacifiCorp's Utah customers in an Oregon general rate case. The Commission found that the customer's claim that PacifiCorp's Oregon operations could potentially affect prices in Utah was an insufficient interest.¹⁷ IID's interest in this case is even less, since it is an out-of-state entity with no current customer or business relationship to PacifiCorp.

B. Participation of a California public power utility in this docket necessarily would broaden the issues, burden the record and delay the proceeding.

This docket addresses Oregon-specific issues related to PacifiCorp's interjurisdictional cost allocation.¹⁸ IID vaguely asserts that it intends to address "cost issues," "separation issues," and "changes to the 2017 protocol."¹⁹ IID does not explain how these issues are connected to IID's stated interest in the development of renewable electricity. As a California public power utility lacking any stated connection to PacifiCorp, IID's positions will necessarily broaden the issues in this Oregon-specific proceeding, thereby burdening the record and delaying the proceeding.²⁰

C. IID has no special knowledge or expertise that would assist with resolution of this proceeding.

IID has articulated no specialized knowledge or expertise that supports its intervention. IID makes a conclusory claim that it has extensive experience in relevant issues, which will assist the Commission in this proceeding.²¹ Unlike PacifiCorp, however, IID is not an investor-owned utility. IID is not a multi-state utility with experience in inter-jurisdictional cost allocation.²²

¹⁷ *In the Matter of the Revised Tariff Schedules in Oregon Filed by PacifiCorp, dba Pacific Power & Light Co.*, Docket No. UE 94, Order No. 95-1330, 1995 WL 18084398 at *2 (Dec. 19, 1995).

¹⁸ Order No. 17-124 at 4.

¹⁹ Petition at 2.

²⁰ Petition at 2.

²¹ Petition at 3.

²² *See* Petition at 2-3.

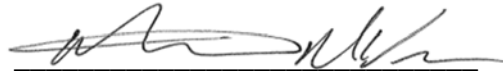
Other intervenors in this docket represent PacifiCorp's Oregon customers or have specialized expertise regarding the Oregon-specific legal and policy issues. In contrast, IID's experience as a public power utility in California brings no useful insights to this case.

IV. CONCLUSION

IID has no stake in the outcome of this docket, is not a customer of PacifiCorp, and has no relationship to Oregon. As a result, allowing IID to participate in this docket necessarily would broaden the issues, burden the record, and delay the proceeding. Additionally, IID does not have special knowledge or expertise that would support its participation. PacifiCorp respectfully requests that the Commission deny IID's Petition to Intervene in this docket.

Respectfully submitted this 1st day of June, 2017.

By:



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