

August 31, 2017

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UM 1802—Joint Cross Statement and Motion to Modify the Procedural Schedule– Expedited Consideration Requested

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket the joint cross statement and motion to amend the procedural schedule, with expedited consideration requested.

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

Sincerely,

Etta Lockey

Vice President, Regulation

Enclosure

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's **Joint Cross Statement and Expedited Motion to Modify the Procedural Schedule** on the parties listed below via electronic mail and/or or overnight delivery in compliance with OAR 860-001-0180.

Service List UM 1802

COALITION UM 1802		
KEVIN HIGGINS (C)	JOHN LOWE	
ENERGY STRATEGIES LLC	RENEWABLE ENERGY COALITION	
215 STATE ST - STE 200	12050 SW TREMONT ST	
SALT LAKE CITY UT 84111-2322	PORTLAND, OR 97225-5430	
khiggins@energystrat.com	jravenesanmarcos@yahoo.com	
KINGSING C CHOIST STREET	juvoiosainiareos e yanoo.com	
IRION A SANGER (C)		
SANGER LAW PC		
1117 SE 53RD AVE		
PORTLAND, OR 97215		
irion@sanger-law.com		
ann.		
CREA	PRIANCE AND	
GREGORY M. ADAMS	BRIAN SKEAHAN	
RICHARDSON ADAMS, PLLC	CREA	
PO BOX 7218	PMB 409	
BOISE, ID 83702	18160 COTTONWOOD RD	
greg@richardsonadams.com	SUNRIVER, OR 97707	
	brian.skeahan@yahoo.com	
CYRPESS CREEK UM 1802		
DAVID BUNGE	TODD GLASS	
CYPRESS CREEK RENEWABLES	WILSON SONSINI GOODRICH & ROSATI PC	
3250 OCEAN PARK BLVD, STE 355	701 FIFTH AVE STE 5100	
SANTA MONICA, CA 90405	SEATTLE, WA 98104	
bunge@ccrenew.com	tglass@wsgr.com	
KEENE M O'CONNOR		
WILSON SONSINI GOODRICH & ROSATI PC		
701 FIFTH AVE STE 5100		
SEATTLE, WA 98104		
kmoconnor@wsgr.com		
ICNU 1802		
JESSE E COWELL (C)	BRADLEY MULLINS (C)	
DAVISON VAN CLEVE	MOUNTAIN WEST ANALYTICS	
333 SW TAYLOR ST., SUITE 400	333 SW TAYLOR STE 400	
PORTLAND, OR 97204	PORTLAND, OR 97204	
jec@dvclaw.com	brmullins@mwanalytics.com	

RILEY G PECK	
DAVISON VAN CLEVE, PC	
333 SW TAYLOR, STE 400	
PORTLAND OR 97204	
rgp@dvclaw.com	
IDAHO POWER UM 1802	
IDAHO POWER COMPANY	LISA F RACKNER
PO BOX 70	MCDOWELL RACKNER & GIBSON PC
BOISE, ID 83707-0070	419 SW 11TH AVE., SUITE 400
dockets@idahopower.com	PORTLAND, OR 97205
<u> </u>	dockets@mrg-law.com
	dockets ching law.com
DONOVAN E WALKER	
IDAHO POWER COMPANY	
PO BOX 70	
BOISE, ID 83707-0070	
· ·	
dwalker@idahopower.com	
NIPPC UM 1802	
ROBERT D KAHN	SIDNEY VILLANUEVA (C)
	* *
NORTHWEST & INTERMOUTAIN	SANGER LAW, PC
POWER PRODUCERS COALITION	1117 SE 53RD AVE
PO BOX 504	PORTLAND, OR 97215
MERCER ISLAND, WA 98040	sidney@sanger-law.com
rkahn@nippc.org	
000000000000000000000000000000000000000	
ODOE UM 1802	
DIANE BROAD (C)	JESSE D. RATCLIFFE
OREGON DEPARTMENT OF ENERGY	OREGON DEPARTMENT OF ENERGY
625 MARION ST NE	1162 COURT ST NE
SALEM OR 97301-3737	SALEM, OR 97301-4096
diane.broad@state.or.us	jesse.d.ratcliffe@doj.state.or.us
WENDY ON CONC	
WENDY SIMONS	
OREGON DEPARTMENT OF ENERGY	
625 MARION ST NE	
SALEM, OR 97301	
wendy.simons@oregon.gov	
PACIFICORP UM 1802	I
PACIFICORP, DBA PACIFIC POWER	ETTA LOCKEY
825 NE MULTNOMAH ST, STE 2000	PACIFIC POWER
PORTLAND, OR 97232	825 NE MULTNOMAH ST., STE 2000
oregondockets@pacificorp.com	PORTLAND, OR 97232
	etta.lockey@pacificorp.com

DUSTIN T TILL	
PACIFIC POWER	
825 NE MULTNOMAH ST STE 1800	
PORTLAND, OR 97232	
dustin.till@pacificorp.com	
PGE UM 1802	
ROB MACFARLANE	V. DENISE SAUNDERS
PORTLAND GENERAL ELECTRIC	PORTLAND GENERAL ELECTRIC
121 SW SALMON ST, 1WTC0702	121 SW SALMON ST 1WTC1301
PORTLAND, OR 97204	PORTLAND, OR 97204
rob.macfarlane@pgn.com	denise.saunders@pgn.com
pge.opucfilings@pgn.com	
RENEWABLE NW	
RENEWABLE NORTHWEST	DINA DUBSON KELLEY (C)
421 SW 6TH AVE., STE. 1125	RENEWABLE NORTHWEST
PORTLAND, OR 97204	421 SW 6TH AVE STE 1125
dockets@renewablenw.org	PORTLAND, OR 97204
double of the waster was	dina@renewablenw.org
SILVIA TANNER (C)	
RENEWABLE NORTHWEST	
421 SW 6TH AVE, STE 1125	
PORTLAND, OR 97204	
silvia@renewablenw.org	
SILVIN O TONO II MOTORI	
STAFF UM 1802	
BRITTANY ANDRUS (C)	STEPHANIE S ANDRUS (C)
PUBLIC UTILITY COMMISSION OF	PUC STAFFDEPARTMENT OF JUSTICE
OREGON	BUSINESS ACTIVITIES SECTION
PO BOX 1088	1162 COURT ST NE
SALEM, OR 97308-1088	SALEM, OR 97301-4096
brittany.andrus@state.or.us	stephanie.andrus@state.or.us
	2002
NOLAN MOSER (C)	†
OREGON PUBLIC UTILITY	
COMMISSION	
PO BOX 1088	
SALEM OR 97308	
nolan.moser@state.or.us	

Dated August 31, 2017.

Jennifer Angell
Supervisor, Regulatory Operations

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1802

In the Matter of

PUBLIC UTILITY COMMMISSION OF OREGON,

Investigation to Examine PacifiCorp d/b/a Pacific Power's Non-Standard Avoided Cost Pricing.

JOINT CROSS STATEMENT AND EXPEDITED MOTION TO MODIFY THE PROCEDURAL SCHEDULE

Under OAR §§ 860-001-0390(2)(b), -0420(1), and -0420(6), Public Utility Commission of Oregon Staff (Staff), PacifiCorp, the Oregon Department of Energy (ODOE), Renewable Energy Coalition (REC), Industrial Customers of Northwest Utilities (ICNU), and the Community Renewable Energy Association (CREA) (collectively, the Movants) file this joint cross statement and motion to modify the procedural schedule.

I. Joint Cross Statement

The Movants are the only parties who have filed testimony in this docket. The Movants do not intend to cross-examine any witnesses. Each of the Movants reserves the right to conduct follow-up questioning or examination of any witnesses who are cross-examined by other parties or questioned by the Administrative Law Judge (ALJ) or Commissioners.¹

¹ The following parties have intervened, but have not filed testimony, in this docket: Renewable Northwest, Northwest Independent Power Producers Coalition, Cypress Creek Renewables, and Portland General Electric Company.

II. Expedited Motion to Modify the Procedural Schedule

Under the current procedural schedule, prehearing briefs are due on September 5, 2017. In light of the Movants' waiver of cross examination, the Movants respectfully request an expedited order modifying the procedural schedule as follows:

Item	Current Schedule	Proposed Schedule
Prehearing Briefs	September 5, 2017	Withdrawn
Opening Briefs		September 15, 2017
Response Briefs		September 25, 2017

The service list has been notified of this proposal, and no party objected to the proposed schedule before this motion was filed. Accordingly, the Movants respectfully ask the Commission to adopt the negotiated procedural schedule.

The Movants request expedited consideration of this motion given that prehearing briefs are due on September 5, 2017.

Respectfully submitted this 31st day of August, 2017.

s/ Dustin T. Till

Dustin T. Till Senior Counsel PacifiCorp Counsel for PacifiCorp 825 NE Multnomah St. Suite 1800 Portland, OR 97232

Telephone: (503) 813.6589

E-mail: <u>Dustin.Till@pacificorp.com</u>

s/ Stephanie Andrus

Stephanie Andrus Sr. Assistant Attorney General

Public Utility Commission of Oregon Staff E-mail: stephanie.andrus@doj.state.or.us

s/ Irion Sanger_

Irion Sanger Sanger Law, PC 1117 SE 53rd Avenue Portland, OR 97215 Telephone: 503-747-7533

Fax: 503-334-2235

E-mail: irion@sanger-law.com

s/ Gregory M. Adams

Gregory M. Adams Of Attorneys for the Community Renewable Energy Association

E-mail: Greg@richardsonadams.com

s/ Jesse E. Cowell

Jesse E. Cowell Davison Van Cleve, PC 333 S.W. Taylor, Suite 400 Portland, Oregon 97204

Telephone: (503) 241-7242 phone

E-mail: jec@dvclaw.com

Of Attorneys for the Industrial Customers of

Northwest Utilities

s/ Jesse D. Ratcliffe

Jesse D. Ratcliffe, #043944
Assistant Attorney General
Of Attorneys for Oregon Department of Energy
E-mail: jesse.d.ratcliffe@doj.state.or.us