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February 15, 2006

### Via Electronic and US Mail

Public Utility Commission Attn: Filing Center 550 Capitol St. NE #215 P.O. Box 2148 Salem OR 97308-2148

Re: In the Matter of PACIFIC POWER & LIGHT Request for a

General Rate Increase in the Company's Oregon Annual Revenues

Docket No. UE 170

Dear Filing Center:

Enclosed please find the original and two copies of the Revised Cross Examination Statement of the Klamath Off-Project Water Users in Docket No. UE 170.

Please return one file-stamped copy of this document in the enclosed stamped envelope.

Thank you for your assistance.

Sincerely,

Ruth A. Miller
Ruth A. Miller

Enclosures

cc: Service List

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Revised Cross Examination Statement of the Klamath Off-Project Water Users, Inc., upon the parties on the service list, shown below, by causing the same to be served by U.S. Mail, postage-prepaid, through the U.S. Mail, and/or via email to those parties with an email address.

Dated at Portland, Oregon, this 15th day of February, 2006.

# /s/ Ruth A. Miller Ruth A. Miller

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## BEFORE THE PUBLIC UTILITY COMMISSION

### **OF OREGON**

**UE 170** 

	)	
In the Matter of	)	
	)	REVISED CROSS-EXAMINATION
PACIFIC POWER & LIGHT	)	STATEMENT OF THE KLAMATH OFF-
(dba PACIFICORP)	)	PROJECT WATER USERS, INC.
	)	
Request for a General Rate Increase in the	)	
Company's Oregon Annual Revenues	)	
(Klamath River Basin Irrigator Rates).	)	
	)	

Pursuant to Administrative Law Judge Grant's Memorandum and Notice of Hearing issued on January 30, 2006, in Public Utility Commission of Oregon ("OPUC" or the "Commission") Docket No. UE 170, Klamath Off-Project Water Users, Inc. ("KOPWU") submits this Revised Cross-Examination Statement. KOPWU has removed Oregon Natural Resources Council *et al.* witness Kimberly Priestly and PacifiCorp witness Karl Anderberg from the list of witnesses that KOPWU intends to cross-examine at the hearing to be held on February 16, 2006. WaterWatch has agreed to waive cross examination of KOPWU witness Katie Iverson. KOPWU also has added PacifiCorp witness Paul Wrigley to its cross examination list. The table below includes the name of each witness that KOPWU intends to cross examine, the general subject matter of the cross-examination, and an estimate of the time needed to complete cross-examination. KOPWU reserves the right to ask follow-up of questions of any witness who another party cross examines.

KOPWU is in discussions with PacifiCorp regarding SB 81 issues. The outcome of these discussions may further reduce KOPWU's cross examination issues.

PAGE 1 – REVISED CROSS-EXAMINATION STATEMENT OF KOPWU

Witness	Party	Issue(s)	Time
William McNamee	OPUC Staff	<ul> <li>Cost of Service Issues</li> <li>Implementation of SB 81</li> <li>Off-Project Contribution to Klamath River Flow</li> </ul>	30 minutes
William Griffith	PacifiCorp	• Implementation of SB 81	15 minutes
Mark Smith	PacifiCorp	<ul> <li>Credit for Value Concepts</li> <li>Value of Power in PacifiCorp's Hydroelectric Facilities</li> </ul>	15 minutes
Steven Deverel	PacifiCorp	<ul><li>Klamath Basin Aquifers</li><li>Flow of Water in Klamath Basin</li><li>Effects of Groundwater Pumping</li></ul>	30 minutes
Paul Wrigley	PacifiCorp	<ul><li>Cost Allocation Issues</li><li>PacifiCorp Revenue Requirement</li></ul>	15 minutes
Barry Hecht Bonnie Mallory Stacey Porter	ONRC et al.	<ul><li>Klamath Irrigation Project Facilities</li><li>Klamath River Basin</li><li>Klamath Basin Aquifers</li></ul>	30 minutes

Dated this 15th day of February, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

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Of Attorneys for Klamath Off-Project Water Users

PAGE 2 – REVISED CROSS-EXAMINATION STATEMENT OF KOPWU

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Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

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