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September 21, 2015

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

Re: Docket UM 1662—Joint Request for Oral Argument of Portland General Electric and PacifiCorp

PacifiCorp d/b/a Pacific Power (PacifiCorp) submits for filing the Joint Request for Oral Argument of Portland General Electric Company and PacifiCorp.

Please direct any informal inquiries to Jay Tinker at (503) 464-7002 or Erin Apperson at (503) 813-6642.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1662

In the Matter of
PORTLAND GENERAL ELECTRIC
COMPANY and
PACIFICORP d/b/a PACIFIC POWER,
Request for a Generic Power Cost Adjustment
Mechanism Investigation

**JOINT REQUEST FOR ORAL
ARGUMENT OF PORTLAND
GENERAL ELECTRIC
AND PACIFIC POWER**

1

2 In accordance with OAR 860-001-0660, Portland General Electric Company (PGE)
3 and PacifiCorp d/b/a Pacific Power (Pacific Power), collectively referred to as the Joint
4 Utilities, respectfully submit this Joint Request for Oral Argument to the Public Utility
5 Commission of Oregon (Commission). The Joint Utilities have consulted with the active
6 parties to this docket regarding this request. Staff takes no position, the Industrial Customers
7 of Northwest Utilities does not oppose the request, and the Citizens' Utility Board of Oregon
8 does not object to oral argument in this proceeding to the extent that the Commissioners
9 would find it valuable.

10 The Joint Utilities request the Commission classify this case as a major proceeding
11 under OAR 860-001-0660 for purposes of allowing the parties to present oral argument.¹ A
12 case can be qualified as a major proceeding if it: (1) has substantial impact on utility rates;²

¹ OAR 860-001-0660(3) ("When a docket is opened, a party may file a motion with the ALJ requesting that the case be classified as a major proceeding."); OAR 860-001-0660(4) ("If a case is classified as a major proceeding, the Commission must afford the parties an opportunity to present oral argument to a quorum of Commissioners before a final order is issued."). The Joint Utilities request a waiver of the provision in OAR 860-001-0660(4) that requires a party to request oral argument at the prehearing conference or as soon thereafter as possible. OAR 860-001-0000(2).

² OAR 860-001-0660(1)(a).

1 (2) is likely to result in a significant change in regulatory policy;³ or (3) raises novel
2 questions of law.⁴

3 This case meets the criteria for major proceeding status set forth in OAR 860-001-
4 0660(2)(a).⁵ When recommending that the Commission open this investigation, Staff
5 concluded that the issues are “sufficiently important, and the dollars at stake sufficiently
6 material, to warrant the Commission's examination.”⁶ Staff agreed that the case presented a
7 policy question that the Commission had not yet considered.⁷

8 The Commission’s review of the Joint Utilities’ proposed Renewable Resource
9 Tracking Mechanism (RRTM) raises important issues of policy and law. In addition,
10 adoption of the RRTM could have a significant impact on rates, as certain costs and benefits
11 of renewable energy resources—including variable power costs and benefits and changes in
12 production tax credits—are fully reflected in rates for the first time.

13 Alternatively, the Joint Utilities request that the Commission exercise its discretion to
14 allow oral argument in this case, even if it does not classify the case as a major proceeding.
15 Because the issues here are largely questions of law and policy, rather than factual disputes,
16 the Joint Utilities are concurrently waiving cross-examination (subject to the admission of
17 cross-examination exhibits). If other parties waive cross-examination and the

³ OAR 860-001-0660(2)(a).

⁴ OAR 860-001-0660(2)(b).

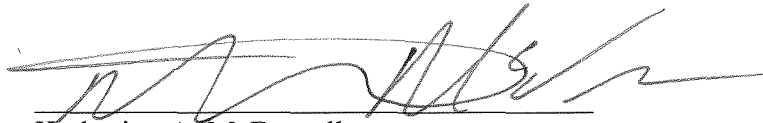
⁵ OAR 860-001-0660(2)(a).

⁶ Staff’s Public Meeting Memorandum at 5 (Nov. 5, 2014).

⁷ Staff’s Public Meeting Memorandum at 5 (Nov. 5, 2014).

- 1 hearing is cancelled, oral argument could provide a useful forum for the parties to present
- 2 their positions to the Commission and respond to questions.

Respectfully submitted this 21st day of September, 2015.



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PacifiCorp d/b/a/ Pacific Power

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Attorneys for Portland General Electric Company
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