1	BEFORE THE PUBLIC UTILITY COMMISSION			
2	OF OREGON			
3	UE 296			
4				
5	In the Matter of			
6	PACIFICORP, dba PACIFIC POWER,	STAFF'S REPLY BRIEF		
7	2016 Transition Adjustment Mechanism			
8				
9				
10	Staff of the Public Utility Commission of Oregon (Staff) replies to the Response Briefs			
11	submitted by Noble Americas Energy Solutions LLC (Noble Solutions), the Industrial Customers			
12	of Northwest Utilities (ICNU), and the Citizens' Utility Board (CUB) (collectively, the			
13	Intervenors).			
14	In its Cross-Answering Testimony, Staff supported the positions taken by PacifiCorp			
15	d/b/a Pacific Power (PacifiCorp) on the following issues: (1) Reserves Modeling Adjustments			
16	(see ICNU Response Brief at 18-23); Hermiston Purchase Contract (see ICNU Response Brief at			
17	28-30); Modeling Avian Protection (see ICNU Response Brief at 31-32); and Direct Access			
18	Issues (see Noble Solutions Response Brief) <sup>1</sup> . Staff stands by its positions taken on these various			
19	issues. See generally Staff/200, Ordonez/17-28. Since none of the Intervenors addressed the			
20	positions presented by Staff in its Cross-Answe	ring Testimony, Staff will not submit a		
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26	<sup>1</sup> Staff originally supported Noble Solutions' "fa support as stated in Staff's Prehearing Memora	reed-up RECs" issue but later withdrew its ndum.		
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1	substantive Reply Brief other than to affirm that Staff agrees with and supports the arguments			
2	made by PacifiCorp in its Opening Brief about the disputed issues set forth above.			
3	DATED this	day of October, 2	2015.	
4			Respectfully submitted,	
5			ELLEN F. ROSENBLUM Attorney General	
7			Millerto	
8			Michael T. Weirich, #82425	
9		8	Assistant Attorney General Of Attorneys for Staff of the Publ	ic Utility
10			Commission of Oregon	
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