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May 9, 2005

Via Electronic and US Mail

Oregon Public Utility Commission
Attn: Filing Center
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 an original and six copies of the Direct Testimony of Kathryn E. Iverson on behalf of the Klamath Off-Project Water Users, Inc. in the above-captioned docket.

Please return one file-stamped copy of the document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely,

/s/ Ruth A. Miller
Ruth A. Miller

Enclosures

cc: Service List

**Before the
Public Utility Commission
of Oregon**

**In the Matter of the Request of
PACIFIC POWER & LIGHT (dba PacifiCorp)
Request for a General Rate Increase in the Company's
Oregon Annual Revenues.**

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UE 170

Direct Testimony of
Kathryn E. Iverson

On Behalf of
Klamath Off-Project Water Users, Inc.

May 9, 2005



1 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A My name is Kathryn E. Iverson; 17244 W. Cordova Court, Surprise, Arizona, 85387.

3 **Q WHAT IS YOUR OCCUPATION AND BY WHOM ARE YOU EMPLOYED?**

4 A I am a consultant in the field of public utility regulation and employed by the firm of
5 Brubaker & Associates, Inc. (BAI), regulatory and economic consultants with
6 corporate headquarters in St. Louis, Missouri.

7 **Q WOULD YOU PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND**
8 **EXPERIENCE?**

9 A I have a Bachelor of Science Degree in Agricultural Sciences and a Master of
10 Science Degree in Economics from Colorado State University. I have been a
11 consultant in this field since 1984, with experience in utility resource matters, cost
12 allocation, and rate design. More details are provided in Appendix A to this
13 testimony.

14 **Q ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

15 A I am testifying on behalf of the Klamath Off-Project Water Users, Inc. ("KOPWU").
16 KOPWU is an Oregon non-profit trade association, whose members are irrigators that
17 take electric service from PacifiCorp in accordance with Schedule 33 (Klamath Basin
18 Irrigation Contracts – Irrigation and Drainage Pumping) and an April 30, 1956
19 agreement (the "Off-Project Agreement" or "Agreement") between the California
20 Oregon Power Company ("Copco") and the Klamath Basin Water Users Protective
21 Association. A copy of this Agreement is attached as Exhibit KOPWU/101. The Off-
22 Project Agreement provides that the Off-Project rates took effect on May 1, 1956, and
23 the Agreement bears no explicit expiration date.

1 The Off-Project Agreement provides for the sale of electricity for irrigation and
2 agricultural drainage pumping service for users not on "Project Land." A Copco
3 electric tariff titled "Upper Klamath River Basin Irrigation and Agricultural Drainage
4 Pumping Service Tariff (For Users Not on Project Land)" that bears an effective date
5 of May 1, 1956, defines "Project Land" as:

6 All land of the United States lying in the Upper Klamath River Basin,
7 and all land in the Upper Klamath River Basin lying within any public
8 district or within the service area of any association which has
9 contracted or may hereafter contract and any land of individuals or
10 corporations in the Upper Klamath River Basin which have contracted
11 or may hereafter contract with the United States, pursuant to the
12 Federal reclamation laws, for water service or for the construction of
13 irrigation, drainage, or other reclamation works.

14 **Q WHAT SUBJECTS DO YOU ADDRESS?**

15 A I have been asked to review PacifiCorp's proposal to move KOPWU's members to
16 Agricultural Pumping Service Tariff, Schedule 41/741.

17 **Q ARE YOU SPONSORING ANY EXHIBITS IN CONNECTION WITH YOUR**
18 **TESTIMONY?**

19 A Yes. I am sponsoring Exhibits KOPWU/101 and KOPWU/102. These exhibits were
20 prepared either by me or under my supervision and direction.

21 **Q WOULD YOU PLEASE SUMMARIZE YOUR FINDINGS AND CONCLUSIONS?**

22 A The main points of my testimony can be summarized as follows:

- 23 • Despite the fact that the Off-Project Agreement has no explicit expiration date,
24 PacifiCorp plans to move all the Klamath Basin irrigators, including Off-Project
25 Customers, to standard tariff rates in 2006.
- 26 • KOPWU has challenged the basis for PacifiCorp moving Off-Project
27 Customers to Schedule 41 in 2006, and those issues are being taken up in
28 OPUC Docket No. UE 171. In the meantime, however, if PacifiCorp's
29 proposal is allowed, KOPWU members will face net **increases of 921%** in
30 their electric bills for irrigation and drainage pumping.

- 1 • The extraordinary rate increases facing all Klamath irrigation customers
2 clearly constitute rate shock. This Commission has regularly taken into
3 consideration the avoidance of rate shock as a principle in the allocation of
4 rate spread. That principle should not be abandoned at this time.
- 5 • We recommend the Commission explore alternative methods for transitioning
6 those customers to tariff-based rates if the Commission determines that
7 changing the Off-Project rate is warranted. For example, maintaining Klamath
8 Basin irrigation loads as a separate class served under Schedule 33 would
9 facilitate this transition and allow the Commission to establish appropriate rate
10 mitigation policies for the Klamath Basin irrigation customers.
- 11 • Klamath Basin irrigators are typically larger loads on average than Schedule
12 41 irrigators. The Off-Project irrigators' average use per customer is almost
13 four times greater than Schedule 41 usage. Thus, there may be reason to
14 expect that the costs of serving Off-Project Customers are lower on average
15 than serving other irrigators.
- 16 • PacifiCorp's findings that Klamath Basin irrigators are more costly to serve
17 should not be accepted in this proceeding. The key parameter driving this
18 finding is PacifiCorp's assumption regarding the distribution of customers and
19 distance to substation. It would be premature to accept this critical parameter
20 without further analysis.
- 21 • Finally, my testimony reflects only KOPWU's initial position regarding
22 PacifiCorp's proposal in this Docket, pending resolution of issues in Docket
23 No. UE 171. Depending on the Commission's decision in Docket No. UE 171,
24 it may be necessary to address certain "residual" issues from that proceeding
25 at a later time in Docket No. UE 170. Consequently, I am submitting this
26 testimony as a placeholder pending resolution of the issues in Docket No. UE
27 171 and a determination whether supplemental testimony regarding the rates
28 for Klamath irrigators is necessary.

29 **Q HAVE YOU REVIEWED PACIFICORP'S TESTIMONY ON MOVING THE KOPWU**
30 **IRRIGATORS TO SCHEDULE 41?**

31 **A Yes.** In his testimony, Mr. Donald N. Furman describes PacifiCorp's plans to move
32 both Off-Project Customers and those who are located on "Project Land" to standard
33 tariff rates in 2006:

1 The irrigators in the Klamath Basin within the boundaries of the
2 Klamath Reclamation Project (On-project irrigators) buy power
3 from PacifiCorp at rates established pursuant to a 50-year
4 agreement with the federal Bureau of Reclamation (BOR) signed
5 in 1956 by Pacific Power and Light Company's predecessor, the
6 California-Oregon Power Company, that is set to expire in 2006
7 (USBR). Upon expiration of USBR, Klamath Basin On-project
8 irrigators will pay PacifiCorp's standard tariff rates in Oregon and
9 California. Moving these customers to standard tariff rates will
10 substantially increase their electricity costs.

11 Oregon Klamath River Basin irrigators outside the boundaries of
12 the Klamath Reclamation Project [Off-Project irrigators] also buy
13 power from PacifiCorp (UKRB). PacifiCorp plans to move these
14 off-project irrigators to standard tariff rates concurrent with the
15 expiration of the 1956 USBR. Both USBR and UKRB prices were
16 premised on the value provided by the Klamath irrigation project to
17 Klamath hydroelectric generation, and hence to the utility's other
18 customers.

19 PPL/100, Furman/13.¹ In other words, PacifiCorp plans to move both Off-Project and
20 On-Project Customers to standard irrigation tariffs at the time the On-Project
21 Agreement expires in 2006.

22 **Q HAS PACIFICORP PROVIDED ANY EVIDENCE THAT THE OFF-PROJECT**
23 **RATES WILL ALSO EXPIRE IN 2006?**

24 **A** No, it has not. PacifiCorp simply plans to move all the Klamath Basin irrigators to
25 standard tariff rates "concurrent with the expiration of the 1956 USBR." The rate to
26 serve Off-Project irrigators, however, was not incorporated in the On-Project
27 Agreement and the Off-Project Agreement bears no explicit expiration date.

¹ PacifiCorp refers to On-Project loads as USBR, and Off-Project loads as UKRB.

1 **Q WHAT IS YOUR UNDERSTANDING OF THE DETERMINATION WHETHER THE**
2 **OFF-PROJECT CONTRACT RATES EXPIRE CONCURRENT WITH THE ON-**
3 **PROJECT RATES?**

4 A KOPWU has challenged the basis for PacifiCorp moving Off-Project Customers to
5 Schedule 41 in 2006. Those issues are being taken up in Docket No. UE 171 and the
6 outcome of that legal determination may be unresolved for some time. In the
7 meantime, however, if PacifiCorp's proposal to move Off-Project irrigators to
8 Schedule 41 is allowed, these customers will face huge increases to their bills.

9 **Q WHAT IS THE PROPOSED INCREASE IN THIS PROCEEDING FOR OFF-**
10 **PROJECT CUSTOMERS?**

11 A Because PacifiCorp proposes to migrate Off-Project Customers to Schedule 41, the
12 increase facing these irrigators is a staggering **1,176% on base rates**. PacifiCorp's
13 proposed rate increase is shown on Exhibit KOPWU/102, which is the Company's
14 supplemental response to KOPWU Data Request No. 1.4. Even on a net rate basis,
15 the **increase is 921%** as shown on Exhibit KOPWU/102. This clearly shows the
16 immense increase facing Off-Project Customers in this proceeding.

17 **Q UPON WHAT BASIS DOES PACIFICORP MAKE ITS RECOMMENDATION TO**
18 **RAISE THE OFF-PROJECT RATES BY THIS EXTRAORDINARY INCREASE?**

19 A Customers who are currently on Schedule 41 are facing a 9.9% increase in net rates
20 in this proceeding. Consequently, the lion's share of the increase to Off-Project
21 Customers is not because of the increase facing irrigation rates in general, but the
22 fact that PacifiCorp plans to move those customers to Schedule 41.

1 **Q SHOULD THE COMMISSION APPROVE PACIFICORP'S PROPOSAL WITH**
2 **RESPECT TO MOVING OFF-PROJECT CUSTOMERS TO SCHEDULE 41?**

3 A No. As described above, the Commission is considering the legality of PacifiCorp's
4 proposal in Docket No. UE 171. Regardless of the outcome of that proceeding,
5 however, the extraordinary rate increases facing all Klamath irrigation customers
6 clearly constitute rate shock. This Commission has regularly taken into consideration
7 the avoidance of rate shock as a principle in the allocation of rate spread. That
8 principle should not be abandoned at this time. Consequently, instead of an
9 instantaneous movement of Off-Project Customers to standard irrigation tariffs as
10 proposed by PacifiCorp, the Commission should explore alternative methods for
11 transitioning those customers to tariff-based rates if it determines that changing the
12 Off-Project rate is warranted. For example, maintaining Klamath Basin irrigation
13 loads as a separate class served under Schedule 33 would facilitate this transition
14 and allow the Commission to establish appropriate rate mitigation policies for the
15 Klamath Basin irrigation customers.

16 **Q ARE THERE DIFFERENCES IN THE COST TO PROVIDE SERVICE TO THE**
17 **CURRENT CLASS OF IRRIGATORS COMPARED TO THE KLAMATH BASIN**
18 **IRRIGATORS?**

19 A There may be. When PacifiCorp filed its marginal cost of service study in this
20 proceeding, the irrigation class did not include the Klamath Basin customers. In
21 response to a data request, PacifiCorp reran its marginal study showing the Klamath
22 Basin irrigators as a separate class, as well as combined with current Schedule 41
23 irrigators. As shown in the table below, the usage of the Off-Project irrigators tends to
24 be higher on a per customer basis than either current Schedule 41 customers, or the
25 On-project irrigators. For example, Off-Project irrigators' average use per customer is

almost four times greater than Schedule 41 usage, and twice as much as On-project irrigators. Thus, there may be reason to expect that the costs to serve Off-Project Customers are lower on average than serving other irrigators.

| | <u>Annual MWh</u> | <u>No. of Customers</u> | <u>Average MWh per Customer</u> |
|-------------|-------------------|-------------------------|---------------------------------|
| Schedule 41 | 123,272 | 6,281 | 19.63 |
| On-Project | 53,684 | 1,368 | 39.24 |
| Off-Project | 51,686 | 682 | 75.79 |

Source: USBR Break-Out.xls provided by PacifiCorp on Feb. 14, 2005.

Q DOES PACIFICORP'S MARGINAL COST STUDY SHOW THAT IT IS LESS COSTLY TO SERVE KLAMATH BASIN IRRIGATION LOADS?

A No. Based on PacifiCorp's assumptions, the marginal study provided in Supplemental Response to Klamath Water Users Association Data Request No. 1.14 shows that it costs more to serve the Klamath Basin irrigators. (Although the cost study separates out Schedule 41 from Klamath Basin irrigators, there is no distinction made between Klamath On-Project and Klamath Off-Project loads in the cost study.)

Q WHY DOES PACIFICORP CLAIM IT COSTS MORE TO SERVE KLAMATH BASIN IRRIGATION LOADS?

A The reason behind PacifiCorp's results lies in the Oregon Feeder Model Study, which calculates the cost of building a hypothetical feeder system. A key parameter of this model is PacifiCorp's assumption as to the distance between the Klamath Basin irrigators and the substation:

1 One of the most significant cost drivers of marginal distribution
2 costs is the distance between the customer and the substation.
3 Costs increase as the distance from the substation increases.

4 The feeder model takes distance into account by assigning
5 customers to the different branches of the feeder based upon
6 actual customer locations.

7 PPL/411, Taylor/6.

8 **Q WHAT DID PACIFICORP ASSUME FOR THE DISTANCES OF KLAMATH BASIN**
9 **IRRIGATORS FROM THE SUBSTATION?**

10 A PacifiCorp assumed that substantially more Klamath Basin irrigators are served at
11 greater distances from the substation. Because of this assumption for greater
12 distance from the substation, the costs allocated to the Klamath Basin irrigators were
13 16% to 21% higher for the hypothetical feeder system.

14 **Q DO YOU AGREE THAT THE INFORMATION PROVIDED BY PACIFICORP**
15 **DEMONSTRATES THAT IT COSTS MORE TO SERVE THE KLAMATH BASIN**
16 **IRRIGATORS?**

17 A No. PacifiCorp has not sufficiently justified its assumptions regarding the costs of
18 serving Klamath Basin irrigation customers.

19 **Q SHOULD THE COMMISSION ACCEPT THESE FINDINGS RELATING TO**
20 **DISTANCE IN THE FEEDER MODEL?**

21 A No. The assumption regarding distribution of customers and distance to substation is
22 a critical component in the feeder study, particularly for a potential new customer
23 class such as the Klamath Basin irrigators. It would be premature to accept this
24 critical parameter without further analysis.

1 **Q DOES THIS TESTIMONY REFLECT A DETAILED ANALYSIS OF ALL THE RATE**
2 **ISSUES FACING KLAMATH IRRIGATORS AS A RESULT OF PACIFICORP'S**
3 **PROPOSAL IN THIS DOCKET?**

4 A No. This testimony reflects KOPWU's initial position regarding PacifiCorp's proposal
5 in Docket No. UE 170, pending resolution of the issues Docket No. UE 171. The
6 prehearing conference order in Docket No. UE 171 indicated that after the
7 Commission issues a decision regarding the Klamath contract issues in Docket No.
8 UE 171, it may be necessary to address certain "residual" issues from that
9 proceeding in Docket No. UE 170. In addition, the order indicated that supplemental
10 testimony may be needed to address any "residual" issues. I am submitting this
11 testimony as a placeholder pending resolution of the issues in Docket No. UE 171
12 and a determination whether supplemental testimony regarding the rates for Klamath
13 irrigators is necessary.

14 **Q DOES THIS CONCLUDE YOUR TESTIMONY IN THIS CASE?**

15 A Yes.

Appendix A: Qualifications of Kathryn E. Iverson

1 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A Kathryn E. Iverson; 17244 W. Cordova Court, Surprise, Arizona 85387.

3 **Q PLEASE STATE YOUR OCCUPATION.**

4 A I am a consultant in the field of public utility regulation with Brubaker & Associates,
5 Inc., energy, economic and regulatory consultants.

6 **Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND WORK
7 EXPERIENCE.**

8 A In 1980, I received a Bachelors of Science Degree in Agricultural Sciences from
9 Colorado State University, and in 1983, I received a Masters of Science Degree in
10 Economics from Colorado State University.

11 In March of 1984, I accepted a position as Rate Analyst with the consulting
12 firm Browne, Bortz and Coddington in Denver, Colorado. My duties included
13 evaluation of proposed utility projects, benefit-cost analysis of resource decisions,
14 cost of service studies and rate design, and analyses of transmission and substation
15 equipment purchases.

16 In February 1986, I accepted a position with Applied Economics Group, where
17 I was responsible for utility economic analysis including cogeneration projects,
18 computer modeling of power requirements for an industrial pumping facility, and
19 revenue impacts associated with various proposed utility tariffs. In January of 1989, I
20 was promoted to the position of Vice President. In this position, I assumed the
21 additional responsibilities of project leader on projects, including the analysis of
22 alternative cost recovery methods, pricing, rate design and DSM adjustment clauses,

1 and representation of a group of industrial customers on the Conservation and Least
2 Cost Planning Advisory Committee to Montana Power Company.

3 In March 1992, I accepted a position with ERG International Consultants, Inc.,
4 of Golden, Colorado as Senior Utility Economist. While at ERG, I was responsible for
5 the cost-effectiveness analysis of demand-side programs for Western Area Power
6 Administration customers. I also assisted in the development of a reference manual
7 on the process of Integrated Resource Planning including integration of supply and
8 demand resource, public participation, implementation of the resource plan and
9 elements of writing a plan. I lectured and provided instructional materials on the key
10 concept of life-cycle costing seminars held to provide resource planners and utility
11 decision-makers with a background and basic understanding of the fundamental
12 techniques of economic analysis. My work also included the evaluation of a marginal
13 cost of service study, assessment of avoided cost rates, and computer modeling
14 relating engineering simulation models to weather-normalized loads of schools in
15 California.

16 In November of 1994, I accepted a position with Drazen-Brubaker &
17 Associates, Inc. In April 1995, the firm of Brubaker & Associates, Inc. was formed. It
18 includes most of the former DBA principals and Staff. Since joining this firm, I have
19 performed various analyses of integrated resource plans, examination of cost of
20 service studies and rate design, fuel cost recovery proceedings, as well as estimates
21 of transition costs and restructuring plans.

22 **Q HAVE YOU EVER TESTIFIED BEFORE A REGULATORY BODY?**

23 A Yes. I have testified before the regulatory commissions in Colorado, Georgia, Idaho,
24 Michigan, Montana, Texas and Wyoming.

A G R E E M E N T

AGREEMENT, dated April 30, 1956, between The California Oregon Power Company, hereinafter called Copco, and the Klamath Basin Water Users Protective Association, regarding proposed agricultural pumping power rates for off-project users in the Upper Klamath River Basin boundary which is shown on Exhibit "A" attached.

In consideration for an increased flow of water caused by the development of lands for agricultural purposes within the Upper Klamath River Basin, which increased flow will be used for the generation of electric power in Copco's proposed dam improvements on the Klamath River below Keno, Copco agrees to provide power rates for agricultural pumping for all off-project users in the Upper Klamath River Basin, as follows:

10 Horsepower motors or over. 7½ mills per KWH

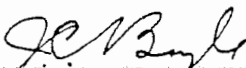
First five year seasonal minimum charge shall be \$111.60 for the first 10 horsepower and \$10.80 per horsepower for all excess horsepower based upon rated horsepower connected but not less than \$111.60 per season.

The minimum charges are payable in consecutive monthly installments of one-sixth of the seasonal minimum charges beginning the first month of seasonal operation, until such time as the accumulated charges equal the seasonal minimum charge.

After the fifth year of continuous use of the same installation, the minimum charge shall be one-half of the first five-year period.

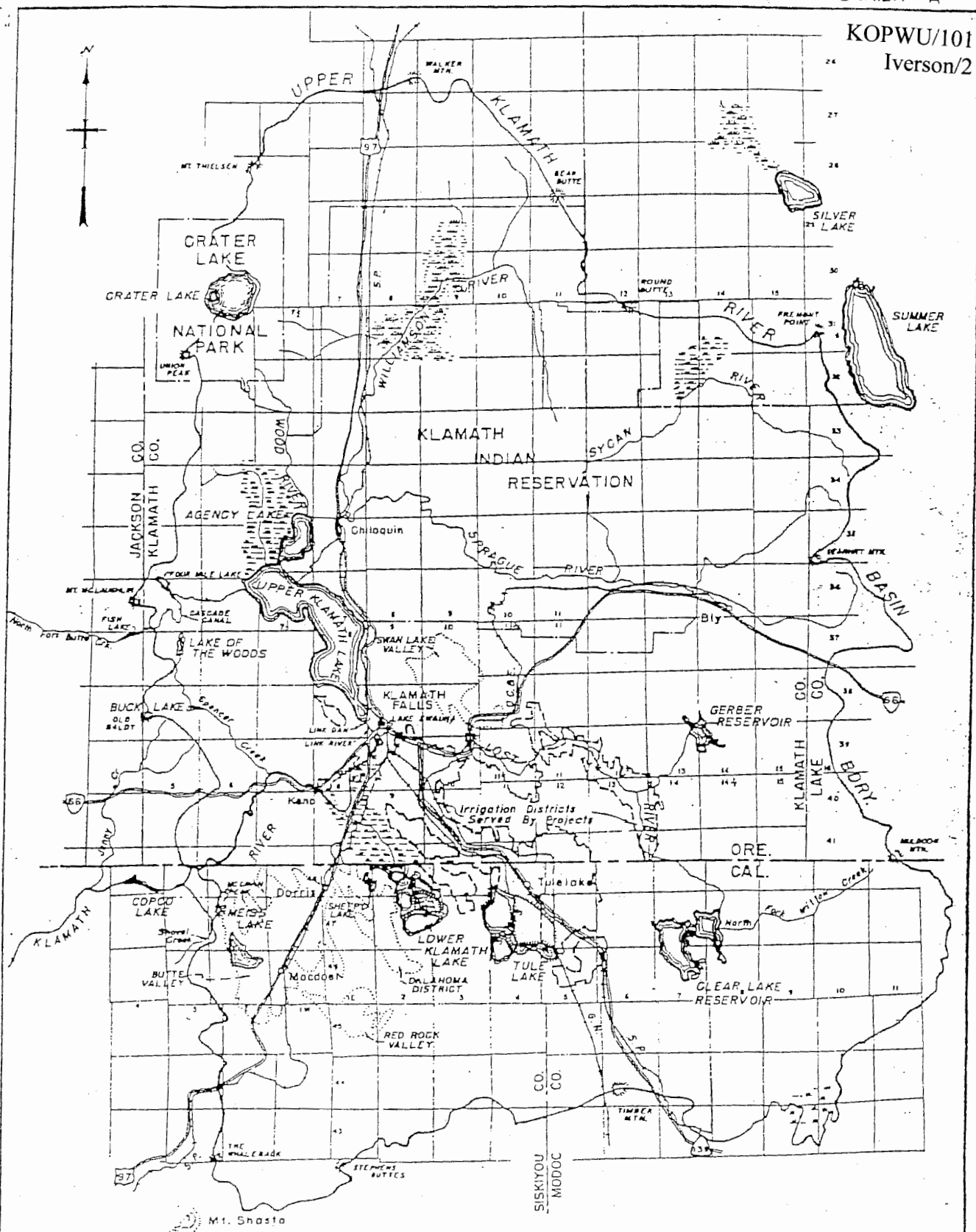
It is agreed that the above proposed rates will take effect on May 1, 1956.

THE CALIFORNIA OREGON POWER COMPANY


J. C. Boyle, Vice-President and
General Manager

KLAMATH BASIN WATER USERS PROTECTIVE
ASSOCIATION


Frank E. Howard, President



UPPER KLAMATH RIVER BASIN
OREGON - CALIFORNIA

KOPWU Data Request 1.4

Regarding PPL/100, Furman/3, 13-14 and PPL/1200, Griffith/8-9, please provide the Company's proposed actual and the overall percentage price increase for the Klamath Basin irrigators that are currently on Schedule 33. Please provide the percentage price increase in "net" and "base" rates.

Supplemental Response to KOPWU Data Request 1.4

The Company objects to KOPWU Data Request 1.4 as vague and ambiguous. Nevertheless, insofar as KOPWU Data Request 1.4 is asking the Company to provide a comparison between Schedule 33 and Schedule 41 base and net rates, Attachment KOPWU 1.4 Supplemental contains the requested data.

FORECAST 12 MONTHS ENDED DECEMBER 31, 2006

| Description | Pre Sch No. | Pro Sch No. | No. of Cust | Contract Rate | | | Schedule 41 Rate | | | | Change | | | |
|-------------|-------------|-------------|-------------|---------------|--------------------------|---------------------|------------------|------------|------------|---------|------------|-----------|------------|----------|
| | | | | MW/h | Present Revenues (\$000) | | Net Rates | Base Rates | Net Rates | | Base Rates | Net Rates | | |
| | | | | | Base Rates | Adders ¹ | | | Rates | % | | (S000) | % | (S000) |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) | (15) |
| | | | | | | | (6) + (7) | | (9) + (10) | | (9) - (6) | (12)/(6) | (11) - (8) | (14)/(8) |
| USBR\UKRB | 33 | 41 | 2,110 | 90,609 | \$604 | \$0 | \$604 | \$7,709 | (\$1,542) | \$6,167 | \$7,105 | 1176.3% | \$5,563 | 921.0% |

| Description | Pre Sch No. | Pro Sch No. | Schedule 41 Rate | | | | Schedule 41 Rate | | | | Change | | | |
|-------------|-------------|-------------|--------------------------|---------------------|---------------------------|---------------------|------------------|---------|------------|------------|------------|----------|------------|----------|
| | | | Present Revenues (\$000) | | Proposed Revenues (\$000) | | Base Rates | | Net Rates | | Base Rates | | Net Rates | |
| | | | Base Rates | Adders ¹ | Net Rates | Adders ² | Base Rates | % | (\$000) | % | (\$000) | % | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) | (15) |
| | | | | | | | (6) + (7) | | (9) + (10) | (9) + (10) | (9) - (6) | (12)/(6) | (11) - (8) | (14)/(8) |
| USBR\UKRB | 33 | 41 | 2,110 | 90,609 | \$7,709 | (\$1,542) | \$6,167 | \$9,109 | (\$2,352) | \$6,757 | \$1,400 | 18.2% | \$590 | 9.6% |

Excludes effects of the BPA Energy Discount (Schedule 98), Low Income Bill Payment Assistance Charge (Schedule 91) and Public Purpose Charge (Schedule 290).

Removal of Sch 94 and includes new Sch 95 Miscellaneous Deferred Accounts Credit \$1.8 million.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Direct Testimony of Kathryn E. Iverson on behalf of the Klamath Off-Project Water Users, Inc., upon the parties on the service list, shown below, by causing the same to be mailed, postage-prepaid, through the U.S. Mail, as well as via email to those parties with an email address.

Dated at Portland, Oregon, this 9th day of May, 2005.

/s/ Ruth A. Miller

Ruth A. Miller

| | |
|--|---|
| RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com | JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org |
| EDWARD BARTELL KLAMATH OFF-PROJECT WATER USERS INC 30474 SPRAGUE RIVER ROAD SPRAGUE RIVER OR 97639 | KURT J BOEHM BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bklawfirm.com |
| LISA BROWN WATERWATCH OF OREGON 213 SW ASH ST STE 208 PORTLAND OR 97204 lisa@waterwatch.org | LOWREY R BROWN CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 lowrey@oregoncub.org |
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| JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org | RANDALL J FALKENBERG RFI CONSULTING INC PMB 362 8351 ROSWELL RD ATLANTA GA 30350 consultrfi@aol.com |

| | |
|---|--|
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| <p>JUDY JOHNSON PUBLIC UTILITY COMMISSION PO BOX 2148 SALEM OR 97308-2148 judy.johnson@state.or.us</p> | <p>JASON W JONES DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us</p> |
| <p>DAN KEPPEL KLAMATH WATER USERS ASSOCIATION 2455 PATTERSON STREET, SUITE 3 KLAMATH FALLS OR 97603</p> | <p>MICHAEL L KURTZ BOEHM, KURTZ & LOWRY 36 E 7TH ST STE 1510 CINCINNATI OH 45202-4454 mkurtz@bklawfirm.com</p> |
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