



DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

August 28, 2017

via ELECTRONIC FILING

Public Utility Commission of Oregon
ATTN: PUC Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UE 323 – Staff's Amended Cross-Examination Exhibits

Attention Filing Center:

Please find attached an amended list of Staff's Cross-Examination Exhibits and Staff Exhibits 719 and 720 (redacted). The confidential attachment to Staff Exhibit 720 will be mailed to the Filing Center and those parties that have signed the protective order in this proceeding.

In the cover email submitting its cross-examination exhibits on August 24, 2017, Staff indicated that Exhibits 719-722 were not attached, as they were then-outstanding discovery responses from PacifiCorp to Staff. After filing its cross-examination exhibits on August 24, PacifiCorp submitted responses to Staff's data requests. Upon review of those data responses, Staff decided to include as cross-exhibits two of the data responses. Staff therefore submits this amended list of cross-examination exhibits, and Staff Exhibits 719 and 720. Staff counsel has conferred with all parties to this proceeding, and no party objects to Staff's inclusion of the two additional cross-examination exhibits.

Please contact me should you have any questions or concerns.

Sincerely,

Sommer Moser
Assistant Attorney General
Business Activities Section

Enclosures
cc: Service List

ST7:pjr/#8468646

1	Staff/711	PacifiCorp Response to OPUC DR 67
2	Staff/712	Excerpt from PacifiCorp workpaper “_JulyCum ORTAM18 NPC
3		Study CONF,” tab “NPC” (Confidential)
4	Staff/713	PacifiCorp Response to OPUC DR 63
5	Staff/714	PacifiCorp Response to OPUC DR 65 (attachment confidential)
6	Staff/715	UE 296 – Direct and Reply Testimony of Brian S. Dickman
7		(excerpts)
8	Staff/716	UE 296 – Direct Testimony of Frank C. Graves
9	Staff/717	UE 307 – Direct and Reply Testimony of Brian S. Dickman
10		(excerpts)
11	Staff/718	Summary Table of GRID Modifications in UE 296
12	Staff/719	PacifiCorp Response to OPUC DR 76
13	Staff/720	PacifiCorp Response to OPUC DR 78 (attachment confidential)

14
15
16
17
18
19
20
21
22
23
24
25
26

Confidential exhibits will be mailed in hard copy to those parties that have signed the appropriate protective order in place in this docket.

DATED this 25th day of August, 2017.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

Sommer Moser, OSB # 105260
Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon

Attorney for Commission Staff

CERTIFICATE OF SERVICE

UE 323

I certify that I have, this date, served COMMISSION STAFF'S AMENDED CROSS-EXAMINATION EXHIBITS confidential page in docket UE 323 upon the parties listed below via first class mail.

GREGORY M. ADAMS (C)
RICHARDSON ADAMS, PLLC
PO BOX 7218
BOISE ID 83702

ALEXA ZIMBALIST (C)
SIERRA CLUB
2101 WEBSTER ST STE 1300
OAKLAND CA 94612

GEORGE COMPTON (C)
PUBLIC UTILITY COMMISSION OF OREGON
PO BOX 1088
SALEM OR 97308-1088

JESSE E COWELL (C)
DAVISON VAN CLEVE
333 SW TAYLOR ST., SUITE 400
PORTLAND OR 97204

SCOTT GIBBENS (C)
PUBLIC UTILITY COMMISSION
201 HIGH ST SE
SALEM OR 97301

MICHAEL GOETZ (C)
OREGON CITIZENS' UTILITY BOARD
610 SW BROADWAY STE 400
PORTLAND OR 97205

KEVIN HIGGINS (C)
ENERGY STRATEGIES LLC
215 STATE ST - STE 200
SALT LAKE CITY UT 84111-2322

ROBERT JENKS (C)
OREGON CITIZENS' UTILITY BOARD
610 SW BROADWAY, STE 400
PORTLAND OR 97205

KATHERINE A MCDOWELL (C)
MCDOWELL RACKNER & GIBSON PC
419 SW 11TH AVE., SUITE 400
PORTLAND OR 97205

MATTHEW MCVEE (C)
PACIFICORP
825 NE MULTNOMAH
PORTLAND OR 97232

BRADLEY MULLINS (C)
MOUNTAIN WEST ANALYTICS
333 SW TAYLOR STE 400
PORTLAND OR 97204

TRAVIS RITCHIE (C)
SIERRA CLUB ENVIRONMENTAL LAW
PROGRAM
2101 WEBSTER STREET, SUITE 1300
OAKLAND CA 94612

DATED this 28th day of August, 2017.



Sommer Moser, OSB # 105260
Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission

OPUC Data Request 76

Energy Imbalance Market - Using PacifiCorp's currently proposed methodology, please provide a forecast of inter-regional EIM benefits for the UE 307 TAM. Please include all work papers associated with this calculation.

Response to OPUC Data Request 76

PacifiCorp objects to this request as unduly burdensome, overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and as requiring the development of a special study or information not maintained in the ordinary course of business.

OPUC Data Request 78

Energy Imbalance Market - Please provide PacifiCorp's most up-to-date actual inter-regional EIM benefits.

Response to OPUC Data Request 78

Please refer to the Confidential Attachment OPUC 78, which provides the most up-to-date actual inter-regional energy imbalance market (EIM) benefits for calendar year 2017; through July 2017.

Confidential information is designated as Protected Information under Order No. 16-128 and may only be disclosed to qualified persons as defined in that order.