

McDowell Rackner & Gibson PC



KATHERINE McDOWELL
Direct (503) 595-3924
katherine@mcd-law.com

August 14, 2014

VIA ELECTRONIC AND U.S. MAIL

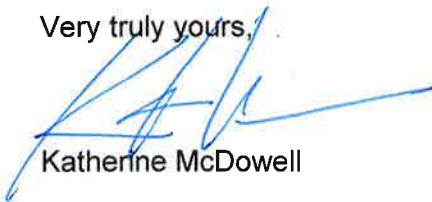
PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

**Re: UE 287– In the Matter PACIFICORP, dba PACIFIC POWER, 2015 Transition
Adjustment Mechanism and UM 1689 – Application for Deferred Accounting and
Prudence Determination Associated with the Energy Imbalance Market**

Attention Filing Center:

On behalf of PacifiCorp, Public Utility Commission of Oregon Staff, the Citizens' Utility Board of Oregon, and the Industrial Customers of Northwest Utilities, enclosed for filing in the captioned dockets are an original and five copies of the Joint Testimony in Support of Stipulation. A copy of this filing was served on all parties to these proceedings as indicated on the attached Certificate of Service.

Very truly yours,



Katherine McDowell

cc: Service List

Docket Nos. UE 287 & UM 1689
Exhibit Settling Parties/100
Witnesses: Dickman, Ordonez, Garcia, Jenks, & Mullins

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

SETTLING PARTIES: PACIFICORP, D/B/A PACIFIC POWER, PUBLIC UTILITY
COMMISSION OF OREGON STAFF, THE CITIZENS' UTILITY BOARD OF
OREGON, AND THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Joint Testimony of Brian S. Dickman, Jorge Ordonez, Deborah Garcia, Bob Jenks, and
Bradley G. Mullins

August 2014

INTRODUCTION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Q. Who is sponsoring this testimony?

A. This testimony is jointly sponsored by PacifiCorp (PacifiCorp or the Company), Staff of the Public Utility Commission of Oregon (Staff), the Citizens' Utility Board of Oregon (CUB), and the Industrial Customers of Northwest Utilities (ICNU) (collectively the Settling Parties).

Q. Please provide your names and qualifications.

A. Our names are Brian S. Dickman, Jorge Ordonez, Deborah Garcia, Bob Jenks, and Bradley G. Mullins. The qualifications of Brian S. Dickman, sponsor for PacifiCorp, are provided in docket UE 287 in PAC/100, Dickman/1. The qualifications of Jorge Ordonez are provided in docket UE 287 in Exhibit Staff/101, Ordonez/1; Jorge Ordonez is the Staff sponsor for the portions of the Joint Testimony addressing issues raised in docket UE 287. The qualifications of Deborah Garcia are provided in docket UM 1689 in Exhibit Staff/202, Garcia/1; Deborah Garcia is the Staff sponsor for the portions of the Joint Testimony addressing issues raised in docket UM 1689. The qualifications of Bob Jenks, sponsor for CUB, are provided in Exhibit Settling Parties/101, submitted with this Joint Testimony. The qualifications of Bradley G. Mullins, sponsor for ICNU, are provided in docket UE 287 in Exhibit ICNU/101, Mullins/1.

Q. What is the purpose of this Joint Testimony?

A. This Joint Testimony describes and supports the stipulation filed in dockets UE 287 and UM 1689 on July 31, 2014 (Stipulation), by the Settling Parties. The Stipulation resolves all issues in dockets UE 287 and UM 1689.

1 **Q. Has any party to dockets UE 287 or UM 1689 objected to the Stipulation?**

2 A. No.

3 **BACKGROUND ON DOCKET UE 287**

4 **Q. Please describe how docket UE 287 began.**

5 A. On April 1, 2014, PacifiCorp filed its 2015 transition adjustment mechanism
6 (TAM), including revised tariff sheets for Schedules 201 and 205. The
7 Company's 2015 TAM updates net power costs (NPC) for 2015 and sets the
8 transition adjustments for customers electing direct access during the November
9 2014 open enrollment period. The Public Utility Commission of Oregon
10 (Commission) opened docket UE 287 to review the filing.

11 **Q. What did the Company include in its April 1, 2014 TAM filing (Initial
12 Filing)?**

13 A. The Company's Initial Filing reflects total-company NPC of approximately
14 \$1.530 billion, or \$378.3 million on an Oregon-allocated basis, for an overall
15 average rate increase of approximately 1.5 percent. This amount is approximately
16 \$17.1 million higher than the \$361.1 million included in rates in the 2014 TAM
17 (docket UE 264), and \$18.3 million higher when adjusted for forecasted load loss
18 and Other Revenues.

19 **Q. Did the Company provide additional information to parties about the TAM
20 Initial Filing before settlement discussions began in Docket UE 287?**

21 A. Yes. On May 29, 2014, the Company provided a list of corrections and known
22 updates. The impact of these corrections and updates was an increase in NPC of

1 \$0.9 million on a total-company basis, or approximately \$200,000 on an Oregon-
2 allocated basis.

3 **Q. Did Staff and other parties conduct discovery on the Company's 2015 TAM**
4 **filing?**

5 A. Yes. Four parties, Staff, CUB, ICNU and Noble Americas Energy Solutions
6 LLC (Noble Solutions), filed a total of nine sets of data requests in this case,
7 containing 99 separate requests.

8 **Q. Did the parties convene an initial settlement conference on June 10, 2014, in**
9 **Docket UE 287?**

10 A. Yes. This conference resulted in an informal agreement among the Settling
11 Parties and Noble Solutions to model Naughton Unit 3 as a coal-fired plant in
12 the TAM July Update (instead of reflecting the generating unit's conversion to
13 natural gas in 2015), reducing total-company NPC by approximately
14 \$32.0 million and Oregon-allocated NPC by approximately \$7.9 million.

15 **Q. How was this informal agreement memorialized in the record in docket**
16 **UE 287?**

17 A. On June 18, 2014, PacifiCorp submitted a letter to Administrative Law Judge
18 Pines that outlined the parties' informal agreement on the modeling of Naughton
19 Unit 3.

20 **Q. Did Staff and other parties file testimony in docket UE 287?**

21 A. Yes. On June 19, 2014, Staff and ICNU filed testimony in docket UE 287. CUB
22 and Noble Solutions did not file testimony, but filed statements reserving their
23 right to continue to participate in the case.

1 **Q. Did Staff propose adjustments to the 2015 TAM?**

2 A. No. Staff indicated that the informal resolution of the modeling of Naughton
3 Unit 3 resolved its primary issue in the case.

4 **Q. Did ICNU propose adjustments to the 2015 TAM?**

5 A. Yes. ICNU recommended several adjustments to NPC, the largest of which
6 related to the inclusion of Energy Imbalance Market (EIM) benefits in the 2015
7 TAM. ICNU's recommendations also included an adjustment based on a new
8 standard for including Qualifying Facility (QF) contracts in the TAM, modifying
9 the TAM Guideline's attestation requirements for the Indicative Update.

10 **BACKGROUND ON DOCKET UM 1689**

11 **Q. Please describe how docket UM 1689 began.**

12 A. On April 18, 2014, the Company filed an Application for Deferred Accounting
13 and Prudence Determination Associated with the Energy Imbalance Market,
14 together with testimony and exhibits supporting the application (EIM
15 Application). The Commission opened docket UM 1689 to review the EIM
16 Application.

17 **Q. What are the major elements of the EIM Application?**

18 A. In the EIM Application, PacifiCorp:
19 (a) Sought approval to defer EIM start-up costs, including \$16 million in capital
20 costs on a total-company basis (approximately \$4 million Oregon allocated)
21 and approximately \$4 million in operations and maintenance (O&M) costs
22 on a total-company basis (approximately \$1 million Oregon allocated);

1 (b) Sought approval to defer annual O&M costs of approximately \$1.7 million
2 total company, or approximately \$425,000 on an Oregon-allocated basis,
3 until these costs are reflected in base rates;

4 (c) Requested a Commission determination that the Company's decision to
5 participate in the EIM was prudent; and

6 (d) Proposed a collaborative process for developing a balancing account or
7 other method for reflecting on-going EIM-related variable costs and benefits
8 in rates.

9 **Q. Did the Commission convene a workshop to review the EIM Application?**

10 A. Yes. On May 28, 2014, the Commissioners met with representatives from
11 PacifiCorp and other parties to review the status of the EIM and the details of the
12 EIM Application.

13 **Q. Did Staff and other parties conduct discovery on the EIM Application?**

14 A. Yes. Three parties (Staff, CUB, and ICNU) filed a total of five sets of data
15 requests in this case, containing 36 separate requests.

16 **Q. Did Staff and other parties file testimony in the EIM Application?**

17 A. Yes. On June 23, 2014, Staff, CUB, and ICNU filed testimony in the EIM
18 Application. Each party opposed or sought modifications to certain aspects of the
19 EIM Application.

20 **JOINT SETTLEMENT PROCESS IN DOCKETS UE 287 AND UM 1689**

21 **Q. Did the parties to dockets UE 287 and UM 1689 decide to consolidate**
22 **settlement discussions in the cases?**

1 A. Yes. The parties convened joint settlement conferences in dockets UE 287 and
2 UM 1689 on July 9, 2014, and July 14, 2014. The Stipulation resulted from the
3 negotiations at these conferences.

4 **Q. Did the Settling Parties agree that PacifiCorp would file its July Update in**
5 **the TAM concurrently with the Stipulation in dockets UE 287 and UM 1689?**

6 A. Yes. PacifiCorp filed the Stipulation and the July Update to the TAM on July 31,
7 2014.

8 **KEY PROVISIONS OF THE STIPULATION**

9 **Q. What is the Settling Parties' agreement in docket UE 287 on the Company's**
10 **2015 NPC?**

11 A. The Settling Parties agree to establish a total-company baseline for 2015 NPC of
12 \$1.496 billion, or \$370.0 million on an Oregon-allocated basis, subject to the July
13 Update, November Indicative Update, and Final Update.

14 **Q. Please describe the adjustments to NPC included in the Stipulation.**

15 A. The Settling Parties describe these adjustments in Exhibit A to the Stipulation as
16 follows:

- 17 • Modeling Naughton Unit 3 as a coal-fired unit in 2015—\$32.0 million
18 reduction on a total-company basis, or \$7.9 million on an Oregon-allocated
19 basis.
- 20 • Costs of EIM participation—\$6.7 million increase on a total-company basis,
21 or approximately \$1.7 million on an Oregon-allocated basis.
- 22 • Benefits of EIM participation—\$6.7 million reduction on a total-company
23 basis, or approximately \$1.7 million on an Oregon-allocated basis.

- 1 • One-time “black box” adjustment for other issues raised in testimony—\$1.3
2 million reduction on a total company basis, or approximately \$344,000 on an
3 Oregon-allocated basis.

4 **Q. What is the value of the reduction to Oregon NPC in the Stipulation**
5 **compared to the Company’s proposed TAM increase?**

6 A. The stipulated reduction to Oregon NPC compared to the Company’s proposed
7 TAM increase is approximately \$8.3 million, resulting in a revised TAM increase
8 of \$10.1 million, including the load change and Other Revenues adjustments
9 shown in Exhibit A to the Stipulation.

10 **Q. What is the rate impact of the stipulated 2015 TAM increase?**

11 A. As set forth in Exhibit B to the Stipulation, the overall average rate increase is
12 approximately 0.8 percent. In accordance with the stipulation in docket UE 263,
13 approved by Order No. 13-474, the Settling Parties use the functionalized revenue
14 requirement allocation factors from UE 263 to develop rates for the 2015 TAM
15 increase.

16 **Q. Does the July Update in the TAM reflect the agreed-upon reduction to**
17 **Oregon NPC?**

18 A. Yes.

19 **Q. What is the impact of the July Update on the stipulated NPC baseline?**

20 A. The July Update produces only a slight change to the 2015 NPC baseline in the
21 stipulation: \$1.497 billion in NPC on a total-company basis, and \$369.7 million
22 on an Oregon-allocated basis. After accounting for a correction to Other

1 Revenues, the TAM July Update reflects an overall rate increase of \$9.8 million,
2 which is a reduction of \$8.5 million from the Company's Initial Filing.

3 **Q. Will there be additional updates to NPC?**

4 A. Yes. Consistent with both the procedural schedule adopted in docket UE 287 and
5 the TAM Guidelines, the Company will file its November Indicative Update on
6 November 10, 2014, and will file its Final Update on November 17, 2014.

7 **Q. Did the Settling Parties reserve their rights to challenge the July, Indicative,
8 and Final Updates in the TAM?**

9 A. Yes. The Settling Parties reserve their rights to challenge all TAM Updates, but
10 agree not to challenge any issues from the Company's Initial Filing and EIM
11 Application resolved by the Stipulation. The Settling Parties also agree that the
12 Stipulation does not limit the issues any Settling Party may raise in future
13 proceedings, except as expressly provided in the Stipulation.

14 **Q. Please explain the treatment of EIM costs and benefits in the Stipulation.**

15 A. The Settling Parties agree that, at this time, the costs and benefits associated with
16 the EIM are difficult to predict with certainty. As an interim approach, the
17 Settling Parties agree that it is reasonable to offset EIM costs and benefits in 2015
18 NPC. The agreement in the Stipulation resolves the issue of EIM costs and
19 benefits only through December 31, 2015.

20 **Q. How will the Company address costs and benefits of the EIM after December
21 31, 2015?**

22 A. The Company agrees to address EIM-related costs and benefits after December
23 31, 2015, in the 2016 TAM. The Company will participate in one or more

1 workshops with Staff and other interested parties to discuss the operation of the
2 EIM, the methodology for calculating EIM-related benefits, and potential options
3 for addressing EIM-related costs and benefits from January 1, 2016, forward.

4 **Q. Do the Settling Parties agree to the prudence of the Company's decision to**
5 **participate in the EIM?**

6 A. Yes. The Settling Parties agree that PacifiCorp's decision to participate in the
7 EIM was prudent. The Settling Parties agree that, for purposes of the Stipulation,
8 PacifiCorp made this decision on April 30, 2013, the date on which PacifiCorp
9 signed the EIM Implementation Agreement with the California Independent
10 System Operator.¹

11 **Q. Do the Settling Parties limit their agreement with respect the prudence of the**
12 **EIM?**

13 A. Yes. The Settling Parties reserve the right to contest the prudence of PacifiCorp's
14 continued participation in the EIM and the associated costs in future proceedings.

15 **Q. Please describe how the Stipulation addresses start-up O&M expenses for the**
16 **EIM.**

17 A. The Settling Parties agree that the start-up O&M expenses from the date of the
18 EIM Application, April 18, 2014, through December 31, 2014, will be recorded as
19 a regulatory asset.

20 **Q. How does the Stipulation address the amount of start-up O&M costs?**

21 A. The Company currently estimates that start-up O&M expenses will be
22 approximately \$2.7 million total-company, or approximately \$700,000 on an

¹ PacifiCorp filed a copy of the Implementation Agreement as Exhibit PAC/102 to the Testimony of Stefan A. Bird in support of the EIM Application.

1 Oregon-allocated basis. The Settling Parties agree to use this estimate as a cap;
2 the regulatory asset will be based on actual costs incurred from April 18, 2014, to
3 December 31, 2014, but may not exceed \$2.7 million on a total-company basis.

4 **Q. Does the Stipulation address ratemaking treatment of the proposed**
5 **regulatory asset?**

6 A. No, the Stipulation does not address the prudence or ratemaking treatment of the
7 start-up O&M costs associated with the regulatory asset. PacifiCorp agrees that it
8 will address the ratemaking treatment of the regulatory asset in its next general
9 rate case.

10 **Q. Does treatment of start-up O&M expenses as a regulatory asset rather than**
11 **recording expenses through deferred accounting require additional action by**
12 **the Commission?**

13 A. Yes. As part of the order approving the Stipulation in dockets UE 287 and
14 UM 1689, the Settling Parties request that the Commission issue an accounting
15 order authorizing the Company to record start-up O&M expenses for the EIM as a
16 regulatory asset. The agreement in the Stipulation to treat the expenses as a
17 regulatory asset is supported by the record in the Company's EIM Application,
18 and supersedes the Company's request for deferred accounting in the EIM
19 Application.

20 **Q. Please explain the provisions of the Stipulation regarding attestation for QF**
21 **contracts.**

22 A. In its testimony in docket UE 287, ICNU argued that certain QF contracts might
23 be included in the TAM that will not achieve commercial operation during the

1 rate effective period. As a compromise, the Settling Parties agree to include a
2 new provision in PacifiCorp's attestation included with the November Indicative
3 Update in this and future TAM proceedings. For new QFs with executed power
4 purchase agreements that are included in the TAM but are not yet operational,
5 PacifiCorp will confirm that it has a commercially reasonable good faith belief
6 that the new QFs will reach commercial operation during the rate effective period.
7 PacifiCorp's attestation will be based on the information known to it as of the
8 contract lockdown date, but does not require PacifiCorp to opine regarding the
9 commercial viability of any QF.

10 **Q. If the Commission approves the Stipulation, will the Company file revised**
11 **tariff sheets?**

12 A. Yes. The Company will file revised tariff sheets for Schedules 201, 294, and 295
13 as a compliance filing in docket UE 287, consistent with the underlying schedule
14 in docket UE 287. The revised tariff sheets will reflect the adjustments agreed
15 upon in the Stipulation and will reflect the TAM Final Update. PacifiCorp will
16 also file a revised Schedule 205 to incorporate the changes to Other Revenues
17 included in the July Update.

18 **Q. What is the proposed effective date of the revised tariff sheets?**

19 A. The revised tariff sheets will be effective January 1, 2015.

20 **Q. If the Commission rejects any part of the Stipulation, are the Settling Parties**
21 **entitled to reconsider their participation in the Stipulation?**

22 A. Yes. The Settling Parties have negotiated the Stipulation as an integrated
23 document, and if the Commission rejects all or any material portion of the

1 Stipulation or imposes additional material conditions on the Stipulation, any of
2 the Settling Parties are entitled to withdraw from the Stipulation.

3 **REASONABLENESS OF THE STIPULATION**

4 **Q. What is the basis for the Stipulation?**

5 A. The Company's initial filings in dockets UE 287 and UM 1689, and the reply
6 testimonies of Staff and intervenors, create an extensive record on the Company's
7 2015 NPC and its decision to participate in the EIM. The Company responded to
8 multiple sets of data requests and provided updates and corrections to its Initial
9 Filing in the TAM. The parties met for several settlement conferences and
10 resolved their differences through dialogue and negotiations.

11 **Q. Please explain why the Settling Parties believe that the Commission should**
12 **adopt the Stipulation in dockets UE 287 and UM 1689.**

13 A. The Stipulation represents a reasonable compromise for many reasons, including
14 the following: (1) the Stipulation results in an average rate increase of less than
15 one percent for the 2015 TAM; (2) the agreement to model Naughton Unit 3 as a
16 coal resource in 2015 reflects the best information known to the Company at this
17 time; (3) offsetting the costs and benefits associated with the EIM appropriately
18 balances possible risks and benefits during the first full year of the EIM's
19 operation; (4) the stipulation resolves the initial prudence and interim ratemaking
20 issues associated with the Company's decision to participate in the EIM and sets
21 up a framework for resolving EIM ratemaking issues on a more permanent basis;
22 (5) the "black box" adjustment avoids litigation on the remaining issues; and (6)

1 the Stipulation provides additional assurance that QF contracts included in the
2 TAM will provide service in the rate effective period.

3 **Q. Have the Settling Parties evaluated the overall fairness of the Stipulation?**

4 A. Yes. Each Settling Party has reviewed the Company's filings in dockets UE 287
5 and UM 1689 and the Stipulation. The Settling Parties agree that the rates
6 resulting from the Stipulation meet the standard set forth in ORS 756.040 and
7 represent a reasonable compromise of the issues presented in this case.

8 **Q. What do the Settling Parties recommend regarding the Stipulation?**

9 A. The Settling Parties recommend that the Commission adopt the Stipulation as the
10 basis for resolving the issues in dockets UE 287 and UM 1689, and request that
11 the Commission include the terms and conditions of the Stipulation in its final
12 orders in these cases.

13 **Q. Does this conclude your Joint Testimony?**

14 A. Yes.

Docket Nos. UE 287 & UM 1689
Exhibit Settling Parties/101
Witnesses: Dickman, Ordonez, Garcia, Jenks, & Mullins

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

SETTLING PARTIES: PACIFICORP, D/B/A PACIFIC POWER, PUBLIC UTILITY
COMMISSION OF OREGON STAFF, THE CITIZENS' UTILITY BOARD OF
OREGON, AND THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Exhibit Accompanying Joint Testimony of Brian S. Dickman, Jorge Ordonez, Deborah
Garcia, Bob Jenks, and Bradley G. Mullins

Witness Qualifications

August 2014

WITNESS QUALIFICATION STATEMENT

NAME: Bob Jenks

EMPLOYER: Citizens' Utility Board of Oregon

TITLE: Executive Director

ADDRESS: 610 SW Broadway, Suite 400
Portland, OR 97205

EDUCATION: Bachelor of Science, Economics
Willamette University, Salem, OR

EXPERIENCE: Provided testimony or comments in a variety of OPUC dockets, including:

UE 88, UE 92, UM 903, UM 918, UE 102, UP 168, UT 125, UT 141, UE 172, UE 173, UE 207, UE 208, UE 210, UG 152, UM 995, UM 1050, UM 1071, UM 1147, UM 1121, UM 1206, UM 1209, UM 1355, UM 1635, UE 233, UE 246, UM 1633, and UM 1654. Participated in the development of a variety of Least Cost Plans and PUC Settlement Conferences. Provided testimony to Oregon Legislative Committees on consumer issues relating to energy and telecommunications. Lobbied the Oregon Congressional delegation on behalf of CUB and the National Association of State Utility Consumer Advocates. Between 1982 and 1991, worked for the Oregon State Public Interest Research Group, the Massachusetts Public Interest Research Group, and the Fund for Public Interest Research on a variety of public policy issues.

MEMBERSHIP: National Association of State Utility Consumer Advocates
Board of Directors, OSPIRG Citizen Lobby
Telecommunications Policy Committee, Consumer Federation of America
Electricity Policy Committee, Consumer Federation of America
Board of Directors (Public Interest Representative), NEEA

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UE 287 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below:

OPUC Dockets
Citizens' Utility Board of Oregon
610 Broadway, Suite 400
Portland, OR 97205
dockets@oregoncub.org

G. Catriona McCracken
Citizens' Utility Board of Oregon
610 Broadway, Suite 400
Portland, OR 97205
catriona@oregoncub.org

S Bradley Van Cleve
Davison Van Cleve PC
333 SW Taylor – Ste 400
Portland, OR 97204
bvc@dvclaw.com

Katherine A McDowell
McDowell Rackner & Gibson PC
419 SW 11th Ave, Suite 400
Portland, OR 97205
Katherine@mcd-law.com

Michael T Weirich
PUC Staff – Department of Justice
Business Activities Section
1162 Court Street NE
Salem, OR 97301-4096
Michael.weirich@state.or.us

Sarah Wallace
Pacific Power
825 NE Multnomah St Ste 1800
Portland, OR 97232
Sarah.wallace@pacificcorp.com

Robert Jenks
Citizens' Utility Board of Oregon
610 Broadway, Suite 400
Portland, OR 97205
bob@oregoncub.org

Tyler C Pepple
Davison Van Cleve PC
333 SW Taylor – Ste 400
Portland, OR 97204
tcp@dvclaw.com

Kevin Higgins
Energy Strategies LLC
215 State St Ste 200
Salt Lake City, UT 84111-2322
Khiggins@energystrat.com

Bradley Mullins
Mountain West Analytics
333 SW Taylor – Ste 400
Portland, OR 97204
brmullins@mwanalytics.com

Greg Bass
Noble Americas Energy Solutions, LLC
401 West A St., Ste. 500
San Diego, CA 92101
gbass@noblesolutions.com

Oregon Dockets
PacifiCorp, DBA Pacific Power
825 NE Multnomah St, Ste 2000
Portland, OR 97232
oregondockets@pacificcorp.com

Gregory M. Adams
Richardson Adams, PLLC
PO Box 7218
Boise, ID 83702
greg@richardsonadams.com

Douglas C. Tingey
Portland General Electric
121 SW Salmon St. 1WTC1301
Portland, OR 97204
Doug.tingey@pgn.com

Jorge Ordonez
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088
jorge.ordonez@state.or.us

Jay Tinker
Portland General Electric
121 SW Salmon St. 1WTC-0702
Portland, OR 97204
pge.opuc.filings@pgn.com

Dated this 14th of August 2014.


Wendy McIndoo
Office Manager

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1689 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below:

OPUC Dockets
Citizens' Utility Board of Oregon
610 Broadway, Suite 400
Portland, OR 97205
dockets@oregoncub.org

G. Catriona McCracken
Citizens' Utility Board of Oregon
610 Broadway, Suite 400
Portland, OR 97205
catriona@oregoncub.org

S Bradley Van Cleve
Davison Van Cleve PC
333 SW Taylor – Ste 400
Portland, OR 97204
bvc@dvclaw.com

Katherine A McDowell
McDowell Rackner & Gibson PC
419 SW 11th Ave, Suite 400
Portland, OR 97205
Katherine@mcd-law.com

Michael T Weirich
PUC Staff – Department of Justice
Business Activities Section
1162 Court Street NE
Salem, OR 97301-4096
Michael.weirich@state.or.us

Sarah Wallace
Pacific Power
825 NE Multnomah St Ste 1800
Portland, OR 97232
Sarah.wallace@pacificcorp.com

Robert Jenks
Citizens' Utility Board of Oregon
610 Broadway, Suite 400
Portland, OR 97205
bob@oregoncub.org

Tyler C Pepple
Davison Van Cleve PC
333 SW Taylor – Ste 400
Portland, OR 97204
tcp@dvclaw.com

Deborah Garcia
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088
deborah.garcia@state.or.us

Bradley Mullins
Mountain West Analytics
333 SW Taylor – Ste 400
Portland, OR 97204
brmullins@mwanalytics.com

John Crider
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088
john.crider@state.or.us

Oregon Dockets
PacifiCorp, DBA Pacific Power
825 NE Multnomah St, Ste 2000
Portland, OR 97232
oregondockets@pacificcorp.com

Donald Light
Portland General Electric
121 SW Salmon Street, 1WTC1711
Portland, OR 97204
donald.light@pgn.com

Jay Tinker
Portland General Electric
121 SW Salmon St. 1WTC-0702
Portland, OR 97204
pge.opuc.filings@pgn.com

Dated this 14th of August 2014.


Wendy McIndoo
Office Manager