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January 14, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UP 415—PacifiCorp's Motion to Consolidate

PacifiCorp d/b/a Pacific Power encloses for filing a Motion to Consolidate in the above-referenced proceeding.

If you have questions about this filing, please contact Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

Etta Lockey
Vice President, Regulation

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UP 415
UE 219**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of a Property Transfer Agreement for the Lower Klamath Project

MOTION TO CONSOLIDATE

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application to Implement the Provisions of Senate Bill 76

I. INTRODUCTION

In accordance with 860-001-0600, PacifiCorp d/b/a Pacific Power (PacifiCorp) respectfully requests a ruling from the Public Utility Commission of Oregon (Commission) consolidating PacifiCorp’s Application for Approval of a Property Transfer Agreement for the Lower Klamath Project (Application), docketed as UP 415, with docket UE 219, the Commission’s docket on the removal of the Lower Klamath Project dams under the Klamath Hydroelectric Settlement Agreement (KHSA).¹ PacifiCorp’s Application seeks approval of property transfers to the Klamath River Renewal Corporation (Renewal Corporation) to effectuate the KHSA and commence the dam removal process. PacifiCorp filed its Application in docket UP 415 and docket UE 219 concurrently with this Motion to Consolidate.

¹ The KHSA, signed in 2010, is attached as Appendix A to Order No. 10-364 in docket UE 219. The KHSA was amended in 2016 and the KHSA, as amended, is attached as Exhibit 3 to the Application.

II. ARGUMENT

In docket UE 219, the Commission approved customer surcharges for dam removal and accelerated depreciation for the Klamath project, concluding that dam removal under the KHSA was in the best interests of customers.² The Commission also directed the Company to file for approval of the necessary property dispositions in the future after it had met additional conditions for dam removal.³ The Application is in furtherance of the Commission’s orders in docket UE 219 and allows dam removal to move forward.

PacifiCorp understands that the Commission normally docket property-related filings as “UP” filings, but this does not prevent consolidation of a UP filing with an existing, related case (such as docket UE 219). PacifiCorp is seeking consolidation of docket UP 415 with docket UE 219 because UP 415 involves implementation of the KHSA. It is efficient and logical to evaluate the Application in the docket where the Commission already reviewed and approved the KHSA’s approach to dam removal because: (1) the proposed property transfer is in accordance with the KHSA; and (2) the record already developed in docket UE 219 to support the KHSA also supports the property transfer proposed in the Application.

The Commission has discretion to consolidate any cases under 860-001-0600. In the past, the Commission has exercised this discretion when consolidation was the most efficient and logical

² *In the Matter of PacifiCorp, dba Pacific Power, Application to Implement the Provisions of Senate Bill 76*, Docket UE 219, Order No. 10-364, at 12-13 (Sept. 16, 2010), corrected by Errata Order No. 10-390 (Oct. 11, 2010) (approving surcharges); *In the Matter of PacifiCorp, dba Pacific Power, Application to Implement the Provisions of Senate Bill 76*, Docket UE 219, Order No. 10-325 (Aug. 18, 2010) (approving accelerated depreciation).

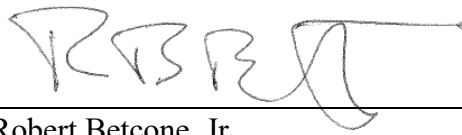
³ Order No. 10-364 at 28–29.

approach,⁴ and when consolidation would clarify the record and simplify resolution of cases.⁵ Similar considerations here support consolidation of docket UP 415 with docket UE 219.

III. CONCLUSION

To promote judicial efficiency, PacifiCorp respectfully requests that the Commission consolidate docket UP 415 with docket UE 219.

Respectfully submitted this 14th day of January, 2021.



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⁴ *In re Portland General Electric and In re PacifiCorp*, Dockets UA 37 and UA 41, Order No. 92-557 (Apr. 16, 1992).

⁵ *In the Matter of the Petition of Idaho Power Company; Amortization in Rates of Certain Deferred Excess Net Power Supply Expenses*, Dockets UE 123 and UE 131, Order No. 02-440 (July 8, 2002).