



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

July 16, 2020

***VIA ELECTRONIC FILING***

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

Attn: Filing Center

**RE: UM 1953—PacifiCorp's Cross-Answering Testimony**

PacifiCorp d/b/a Pacific Power hereby submits for filing the Cross-Answering Testimony of Etta Lockey.

Please direct any informal correspondence and questions regarding this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in black ink, appearing to read "Etta Lockey", with a long, sweeping horizontal line extending to the right.

Etta Lockey  
Vice President, Regulation

Enclosure

Docket No. UM 1953  
Exhibit PAC/200  
Witness: Etta Lockey

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PACIFICORP**

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**Cross-Answering Testimony of Etta Lockey**

**July 2020**

CROSS-ANSWERING TESTIMONY OF ETTA LOCKEY

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1 **Q. Are you the same Etta Lockey who previously submitted opening testimony in**  
2 **this proceeding on behalf of PacifiCorp d/b/a Pacific Power (PacifiCorp or**  
3 **Company)?**

4 A. Yes, I am.

5 **I. PURPOSE AND SUMMARY OF TESTIMONY**

6 **Q. What is the purpose of your testimony?**

7 A. My testimony responds to the reply testimony of Ms. Karla Wenzel and Mr. Josh  
8 Halley on behalf of Portland General Electric Company (PGE) filed on April 15,  
9 2020, in phase two of docket UM 1953 (PGE/700). Specifically, my testimony  
10 responds to PGE's proposed conditions for a voluntary renewable energy tariff  
11 (VRET).

12 **Q. Are you responding to other issues in the testimony of Ms. Wenzel and**  
13 **Mr. Halley?**

14 A. No. The other issues raised in this phase of the proceeding are specific to PGE's  
15 Green Energy Affinity Rider (GEAR) program. The discussion surrounding potential  
16 modifications to the Commission's nine conditions used to determine whether utility-  
17 proposed VRET programs are in the public interest have implications to PacifiCorp if  
18 or when it proposes a VRET.

19 **II. VRET GUIDELINES**

20 **Q. Do you support PGE's proposed revisions to the nine conditions?**

21 A. Yes. PGE's proposed modifications to the nine conditions are reasonable and support  
22 innovation and the development of additional options for customers. The immediate  
23 customer response to PGE's GEAR program shows that customers want these types

1 of options. PGE's GEAR program is an innovative program that is fundamentally  
2 different than direct access, yet the current nine conditions force customers into the  
3 same two-option scenario of tariffed cost-of-service or direct access.

4 **Q. Should Condition 6 be revised as PGE proposes?**

5 A. Yes. Again, the Commission has the ability to review any utility VRET proposal to  
6 ensure that the rates and service are just and reasonable, and fair to direct access  
7 participants. Direct access participants and advocates can continue to participate in  
8 the Commission review of a VRET and raise issues regarding the specific terms of  
9 the proposed VRET. A blanket mirroring of conditions only limits the Commission's  
10 ability to review new programs. This docket is a great example of the need to review  
11 VRET programs based on their individual merits.

12 **Q. Why is the proceeding an example of the need to review VRET programs on**  
13 **their individual merits?**

14 A. The nine conditions were developed in a separate proceeding, in anticipation of what  
15 a utility may propose. The advantage, generally, of this proceeding is that the nine  
16 conditions are being reviewed in the context of an actual proposal. That has brought  
17 clarity to the inapplicability to some of the nine conditions when programs are  
18 structured like PGE's GEAR program. That being said, there is also the risk that  
19 evaluation of the applicability of the nine conditions in this proceeding will be  
20 influenced too much by the components of PGE's particular program. This is exactly  
21 why the Commission should retain the flexibility to review VRET programs on a  
22 case-by-case basis, and any conditions should not be so restrictive to limit the  
23 development of customer options.

1 **Q. Should Condition 7 be revised to allow for a utility to own a green tariff**  
2 **resource?**

3 A. Yes. As long as the utility’s non-participating customers are held-harmless, there is  
4 no reason to limit utility ownership as a rule. The Commission has the ability to  
5 review any proposed utility program to ensure that mitigation measures are included  
6 to protect non-participating customers. PacifiCorp agrees with the comment from  
7 Mr. Robert Kahn that “allowing customers to choose among different programs to  
8 acquire renewable capacity, whether from the utility or from a Direct Access  
9 Provider...” fosters competition. Competition, however, thrives on innovation and  
10 customer choice. Any blanket condition that limits innovation or customer options  
11 should be removed.

12 **III. CONCLUSION**

13 **Q. Please summarize your recommendations to the Commission.**

14 A. I recommend the Commission adopt PGE’s proposed revisions to the Commission’s  
15 conditions to determine whether a VRET is in the public interest.

16 **Q. Does this conclude your cross-answering testimony?**

17 A. Yes.