BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

AR 499

In the Matter of the Adoption of Permanent Rules to Implement SB 408, Relating to Matching Utility Taxes Paid with Taxes Collected	**JOINT REPLY COMMENTS OF PACIFICORP AND AVISTA CORPORATION**

In reply to the Opening Briefs of the Citizens' Utility Board of Oregon ("CUB"), Industrial Customers of Northwest Utilities ("ICNU"), and Northwest Industrial Gas Users ("NWIGU"), PacifiCorp and Avista Corporation ("Avista") (collectively "PacifiCorp/Avista") respectfully submit these joint reply comments.

I. STANDARDS OF STATUTORY INTERPRETATION

All parties that submitted opening comments in this docket used the three-step analytical framework set out by the Oregon Supreme Court in *PGE v. Bureau of Labor and Industries,* 859 P2d 1143, 1145-46 (Or 1993) ("*PGE v. BOLI*") to interpret SB 408. CUB also argued that another standard applies when an agency such as the Oregon Public Utility Commission ("the Commission") interprets a statute. CUB asserts that this standard, derived from *Springfield Education Ass'n v. School District No. 19*, 621 P2d 547 (Or 1980), dictates different responsibilities for statutory interpretation depending on whether the legislative terms involved are "exact, inexact and delegative."

CUB is incorrect that the Commission's statutory interpretation of SB 408 is controlled by any standard other than *PGE v. BOLI.* The *PGE v. BOLI* standard was developed in a case involving an agency and it post-dates the *Springfield* decision by 13 years. In deciding that case, the court did not draw any distinction between agency and non-agency cases. Indeed, the *PGE v. BOLI* court did not even cite the *Springfield* decision, suggesting that its utility was limited even before the *PGE v. BOLI* decision was issued.

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

Even if the *Springfield* approach applied here, however, it would not change the analysis required by *PGE v. BOLI.* First, the term "properly attributed" is most accurately described as an "inexact" term under the *Springfield* analysis, such that it requires an interpretation by the Commission to determine legislative intent. 621 P2d at 553-54 (explaining that "inexact" terms are terms that embody "incomplete expressions of legislative meaning" and require agency interpretation). It is not a term that is "delegative," in the sense that it clearly demonstrates a legislative "delegation of broader, almost plenary authority to make the policy decisions, legislative in nature, necessary to accomplish political objectives which the legislature expresses in general terms." *Id*. at 555-56; *cf* 757.646 (delegative statute which directs Commission to develop policies and establish a code of conduct designed to eliminate barriers to development of competitive market).

Second, as CUB acknowledges, the *Springfield* framework requires a review of legislative intent which must follow *PGE v. BOLI.* *See* CUB Opening Brief at 5. Because all roads lead back to the three-step analytical framework set out in the *PGE v. BOLI* case, the *Springfield* analysis is superfluous. *See Coast Security Mortgage Corp. v. Real Estate Agency*, 15 P3d 29 (Or 2000) (applying the *Springfield Education* framework in its initial analysis, but using the *PGE* analysis to determine legislative intent.)

II. INTERPRETATION OF THE TERM "PROPERLY ATTRIBUTED"

A. PacifiCorp/Avista's Definition of the Term "Properly Attributed" Is Consistent Throughout SB 408 and Gives Meaning to Section 3(7) of the Act.

ICNU and NWIGU assert that the "properly attributed" methodology proposed by Staff and adopted in the temporary rules in AR 498 was the correct approach, based on the argument that Staff's interpretation applies the same definition of the term across all provisions of the Act and that PacifiCorp/Avista's interpretation does not. *See* Opening Comments of ICNU at 3, 5, 7; NWIGU Opening Comments at 2-4. Contrary to this assertion, the PacifiCorp/Avista interpretation adopts a uniform definition of the term that

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

applies to all sections of the Act, whether they refer to regulated utilities or unregulated affiliates. *See* Joint Opening Comments at 5-6 (defining the term "properly attributed" as "tax payments incurred as a result of the economic activities of an entity without regard to the tax liabilities of other entities.")

ICNU and NWIGU explain the alleged inconsistency only by inaccurate characterizations of the PacifiCorp/Avista interpretation of "properly attributable." For example, ICNU argues that application of the PacifiCorp/Avista interpretation to Section 3(7) means that "no amount of taxes paid would be 'properly attributable' to unregulated affiliates unless the utility's stand-alone tax expense was greater than total taxes paid." ICNU Opening Brief at 11.[1] Under the PacifiCorp/Avista definition, however, the unregulated affiliates in a consolidated group are allocated all of the taxes paid that are associated with their individual tax liabilities.

ICNU asserts that the PacifiCorp/Avista interpretation renders "certain provisions of SB 408 meaningless," without ever identifying what those provisions are. ICNU Opening Comments at 10. NWIGU makes a similar assertion with respect to Section 3(7). NWIGU Opening Brief at 3. In fact, it is ICNU and NWIGU that attempt to write Section 3(7) out of the Act by proposing an affiliate loss allocation approach that is directly contrary to Section 3(7)'s ring-fencing language prohibiting "adjustments for taxes in rates that are properly attributed to the any unregulated affiliate of the public utility or to the parent of the utility." *See* Senate Business and Economic Development Committee (May 31, 2005) (statement of legislative counsel Dexter Johnson) ("Subsection 4 is new language that

[1] ICNU also makes the inaccurate statement that under the PacifiCorp/Avista approach, "even if the utility's stand-alone tax liability was greater than the total taxes paid by the affiliate group, affiliate losses would be used to reduce the utility's stand-alone tax expense only if such losses were not fully offset by affiliate gains." ICNU Opening Comments at 10. By definition, the affiliate group's total taxes would be lower than the utility's stand-alone tax liability only if affiliate losses were not fully offset by affiliate gains. Under the PacifiCorp/Avista interpretation of SB 408, the utility tax liability would be reduced by the amount of these remaining losses, contrary to ICNU's assertion.

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

expressly states that the automatic adjustment clause when it is imposed by the PUC may not be used to make adjustments to rates that are attributable to any other affiliate of the utility. So if the utility is either in a parent subsidiary relationship or is in fact the parent of subsidiaries, the automatic adjustment does not apply to the activities of other entities however they are related to the utility, but only to the utility itself.")

B. The Term "Properly Attributed" Does Not Contain a Requirement of Proportionality.

ICNU and NWIGU, as well as CUB, improperly read a requirement of "proportionality" into the term "properly attributed" when they argue that the interpretation proposed by PacifiCorp and Avista would result in the regulated utility being attributed a "disproportionate" share of the overall taxes paid by the consolidated group. *See* NWIGU Opening Comments at 3; Opening Legal Comments of ICNU at 8; CUB Opening Brief at 8-9. That is, they interpret SB 408 to require that the amount of taxes paid by each member of a consolidated group must be *proportionate* to the total amount of taxes paid by the consolidated group as a whole. Such an approach is untenable for a number of reasons.

First, the plain text of SB 408 does not support the CUB/ICNU/NWIGU position. The cardinal rule of statutory interpretation is that "the legislature says in a statute what it means and means in a statute what it says there." *Connecticut Nat'l Bank v. Germain*, 503 US 249, 253-54 (1992). SB 408 does not state that taxes must be "proportionally attributed," it states that they must be "properly attributed."

The definition of the term "proper" is "appropriate; naturally belong to; conforming to an accepted standard." *Webster's New World Dictionary* (2nd ed 1982). The accepted standard is contained in the PacifiCorp/Avista interpretation and is based on traditional cost causation principles: tax expenses of an entity are normally calculated by looking at the economic activities of the entity without regard to the tax liabilities of other entities within the affiliated group. *See* Accounting for Public Utilities, Section 17.04[2], cited in

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

Commission Staff White Paper at 7 ("There is a well-reasoned, and widely recognized, postulate that taxes follow the events they give rise to. Thus, if ratepayers are held responsible for costs they are entitled to the tax benefits associated with the costs. If ratepayers do not bear the costs, they are not entitled to the tax benefits associated with the costs.")

Additionally, the CUB/ICNU/NWIGU interpretation is not supported by legislative history of SB 408. There is no mention of the concept of "proportional attribution" anywhere in the entire legislative history. The legislators who addressed the term "properly attributed" repeatedly stated that taxes were to be properly attributed to a utility based solely on the separate results of the utility's regulated operations. *See* Joint Opening Comments at 7-8 (colloquy between Senator Rick Metsger, a proponent of SB 408, and Pamela Lesh, PGE's Vice President for Regulatory Affairs); Comments of NW Natural re Legal Issues at 7-10 (providing excerpts from Senate and House debates; e.g., Boquist: "* * * In some cases when a consolidated group's tax liability is higher than the utility's **the standalone** * * * method would be used." House Chamber SB 408, July 30, 2005 at 8-9, 12, SB 408 Legislative History at 348, 349, 352 (emphasis added).)

Finally, the "proportionally attributed" approach proposed by CUB, ICNU, and NWIGU cannot be harmonized with the Commission's statutory obligation under ORS 757.646(2)(c) to prevent cross-subsidization by maintaining the separation of regulated and unregulated utility operations.

C. The PacifiCorp/Avista Approach Does Not Perpetuate the Status Quo With Respect to Utility Taxation.

NWIGU and CUB incorrectly claim that the PacifiCorp/Avista interpretation of the term "properly attributed" effectively eviscerates SB 408. *See* CUB Opening Brief at 7 ("[U]nder PacifiCorp's proposed interpretation of the bill, there is no reason for the bill to say 'properly attributed to the regulated operations of the utility.'"); NWIGU Opening

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

Comments at 2 ("The definition supported by the utilities, would perpetuate the stand-alone approach, and render provisions of the bill meaningless."). NWIGU and CUB unfairly imply that adoption of a stand-alone attribution approach under SB 408 means no change to the Oregon Commission's approach to utility taxation. Instead, the PacifiCorp/Avista interpretation gives SB 408 its intended meaning and scope while limiting opportunistic and unfair appropriation of tax benefits from unregulated utility affiliates.

Construed as suggested by PacifiCorp/Avista, SB 408's automatic adjustment clause changes Oregon's approach to utility taxation in two ways. First, to ensure that utility taxes collected from ratepayers are paid in full to government, it requires a reduction in utility taxes whenever the consolidated group's taxes fall below the level of the utility's stand-alone taxes. Under the PacifiCorp/Avista approach, an Oregon utility may not be used to absorb the tax losses of the affiliated group, mooting CUB's concerns about the inappropriate use of Oregon utilities as the "tax mule" for consolidated companies. *See* Staff Report, AR 498 at 2 (September 7, 2005) (PacifiCorp's "attribution approach would remedy the Enron-type situation that proponents of the bill cited.")

As indicated by SB 408 sponsors Senators Metsger and Walker, the purpose of the bill was to fix this issue, the so-called "Enron problem." *See* Senate Business and Economic Development Committee Senate Bill 171 Public Hearing (March 24, 2005) (statement of Chair [Metsger]) ("I will say that as I said this morning, this is an issue that I think is in front of you and was in front of the Commission largely because of people's perceptions primarily in the Enron ownership of PGE that they were paying rates that included expenses for taxes and in effect those taxes never flowed through to the Oregon Treasury or the federal government or Multnomah County or anybody else. I think that's the issue, it's a perception of fairness. These recommendations are an attempt to recognize that."); Senate Chamber Session (June 8, 2005) (statement of Senator Vicki Walker) ("For several years the large electricity and gas utilities regulated by the [Commission] have been charging the Oregon

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

ratepayers hundreds of millions of dollars for state income taxes and federal income taxes that have not in fact been paid to any government entity." Explaining that SB 408 was drafted to correct this problem.); House State and Federal Affairs Committee Senate Bill 408 Public Hearing (June 30, 2005) (statement of Michael Early of ICNU) ("As you know, the corporate structure of investor owned utilities has changed rather dramatically over the last 10 years. It's much more complex and much more controversial then when we used to have sort of homegrown utilities. And now many of our major utilities have parents who are far removed from Oregon and frankly from this legislature. And one of the consequences has been – a very public consequence of some of these acquisitions, particularly in the Enron/PGE situation has been a sustained situation where taxes have been collected from ratepayers, both residential customers and industrial customers, and no taxes have actually been received from those entities either in Salem or to other taxing authorities. Now that's the fundamental question we have before us and the fundamental policy question we are asking you to resolve.")

Second, no matter what interpretation of "properly attributed" is adopted, SB 408's automatic adjustment clause will change Oregon utility taxation by truing-up taxes in rates and taxes paid to government (with some exclusions). SB 408 thus creates an exception to the general rule against retroactive ratemaking with respect to utility tax expense, a significant change to current Oregon law.

Given these impacts, it is not credible to imply that a stand-alone attribution method frustrates the full and complete implementation of SB 408. Instead, this interpretation gives SB 408 its intended scope.

D. CUB's Interpretation of the Significance of the Word "Fair" Is Mistaken

CUB argues in its Opening Brief at 7 that the addition of the word "fair" to Oregon's "just and reasonable" standard under ORS 757.210 indicates that the legislature intended to "reject the Commission's past approach to taxes, and to replace it with a statutorily-required

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

'fair' method of determining taxes in utility rates." *See also* CUB Opening Brief at 12-13 ("The legislature very clearly and very loudly rejected the stand-alone approach that the Commission has historically used to calculate taxes. Legislators clearly believed that the stand-alone approach was overcharging customers for taxes and they were demanding a change."). As just explained, properly construed, SB 408's automatic adjustment clause results in significant but not unbounded changes to Oregon utility taxation. As discussed with respect to the "material adverse effect" issue in PacifiCorp/Avista's Opening Brief, the insertion of the word "fair" into SB 408 was a limiting act, not one that can be read to expand the scope of SB 408 to authorize appropriation of unregulated affiliate tax benefits.

1. SB 408 Does Not Change the Ratemaking Standard.

As an initial matter, it is difficult to understand how the addition of the word "fair" to ORS 757.210 could indicate an intent to change the general ratemaking standard in Oregon when the Oregon public utility statutes already use the word "fair" in a way intended to codify the *Hope* standard.[2] *See* ORS 756.040(1)(a), (b) (providing that the Commission must set rates that are "fair and reasonable.") Given the requirement that words within a statute must be interpreted within the context of related statutes under *PGE*, the legislature's use of the word "fair" in SB 408 indicates that the legislature intended to bring SB 408 in line with the requirement set out in *Hope*. The legislative history supports such an interpretation.

The legislative history demonstrates both that the heart of the Act is its automatic adjustment clause provisions and that the "fair, just and reasonable" language codified the *Hope* standard within ORS 757.210 in response to concerns that SB 408 could result in an unconstitutional taking. *See* Joint Opening Comments at 28-29. Legislative Counsel Dexter Johnson (who drafted the version of the bill that was passed) provided section-by-section analyses of the Act to the Senate Business and Economic Development Committee. There,

[2] *Fed. Power Comm'n v. Hope Natural Gas Co.*, 320 US 591 (1944)

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

Mr. Johnson described the legislative findings and did not at any time say that the findings indicated a legislative intent to change the rate standard in Oregon. *See* SB 408 Work Sessions, Senate Business and Economic Development Committee, May 26 and May 31, 2005. He stated that the findings are "fairly self explanatory." SB 408 Work Session, Senate Business and Economic Development Committee, May 26, 2005. Mr. Johnson explained that Section 2 "describes the concerns regarding * * * the current practices regarding taxes and how the cost for taxes are determined for ratemaking purposes and expresses the legislature's concern with those practices." *Id.*

Mr. Johnson also never stated that Section 5, which amended ORS 757.210 to insert the word "fair" before the phrase "just and reasonable," changed the rate standard in Oregon. *See also* Statement of Rep. Boquist, House Chamber Session, July 30, 2005 (SB 408 "does not change the original ratemaking process"). Rather, Mr. Johnson explained that the revisions to ORS 757.210 were clean-up amendments. *Id.* ("Section 5 is an amendment to existing law, essentially to include cost for taxes in the definition of automatic adjustment clauses, which is set forth in 757.210. It makes consistent the standard of fair, just, and reasonable that appears elsewhere in the draft.").

Given this clear directive from the legislative record, CUB's statement that "[i]f a utility and some of its affiliates are in similar positions, it would not be fair to attribute taxes in a manner that placed the bulk of the tax burden for an entire consolidated company on the utility and little of the tax burden on its affiliates"[3] misses the point of what "fair" was supposed to accomplish. As noted above, the PacifiCorp/Avista approach prohibits a consolidated group from using an Oregon utility to absorb the tax losses of the affiliated group and retaining the tax benefits. And, as the legislative history of SB 408 adequately points out, the term "fair" is intended to prohibit rates from being "confiscatory." CUB's

[3] CUB Opening Brief at 8.

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

approach violates this prohibition because it would without any justification assign $45 million in tax losses from unregulated affiliates to the utility, as illustrated in CUB's example on page 8 of its Opening Brief:

	Stand-Alone Tax Liability	CUB Allocation
Utility	$100 million	$55 million
Affiliate A	$100 million	$55 million
Affiliate B	$ -50 million	$ 0
Parent	$ -40 million	$ 0
Taxes Paid	$110 million	

In CUB's example, the $90 million in tax losses were presumably caused by events wholly unrelated to the utility, given the Commission's statutory obligation to adopt policies that ring-fence unregulated companies from the utility to prevent cross-subsidization and lower risk. CUB does not explain why it is fair to reduce utility tax expense by $45 million based on whatever happenstance that occurred to create the unregulated tax losses.

Moreover, it cannot be considered fair to interpret "properly attributed" as dictating a loss-allocation approach when such an approach will inevitably cause the utility to have higher risk, unless the Commission compensates the utility's shareholders for that higher risk. This higher risk was recognized in the Commission Staff White Paper at 11-12, noting that one of the arguments against capturing the benefits of consolidated income tax filings in customer rates is that it will result in lower utility revenues, resulting in lower net income. This, in turn, will be "viewed negatively from a credit perspective, which could result in higher costs of capital for utility customers and put upward pressure on rates." *See* Commission Staff White Paper, "Treatment of Income Taxes in Utility Ratemaking, " February 2005.

2. The Legislative History Cited by CUB is Not Persuasive

In general, legislative history from individuals is less persuasive than that derived from the statements of the bill's sponsors or drafters. *See Pratum Co-Op Warehouse v. Dep't*

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

of Revenue, 6 Or Tax 130, 136 (1975) (legislative intent is not aided by the statements of a single person, such as testimony of a proponent of a bill before a committee of the legislature); *Murphy v. Nilsen*, 527 P2d 736, 738 (Or App 1974) ("The Commissioner [of the Bureau of Labor], in trying to determine legislative intent, took testimony from persons interested in the legislation (possibly lobbyists) about their observations of what occurred and what the legislators were intending. Such evidence is incompetent for this purpose."); *NLRB v. Fruit and Vegetable Packers and Warehousemen, Local 760*, 377 US 58, 66 (1964) ("It is the sponsors that we look to when the meaning of the statutory words is in doubt.").

Of course, after-the-fact statements of the sponsors do not comprise proper legislative history. *See Gustafson v. Alloyd Co., Inc.*, 513 US 561, 579 (1995) ("Material not available to the lawmakers is not considered, in the normal course, to be legislative history. After-the-fact statements by proponents of a broad interpretation are not a reliable indicator of what Congress intended when it passed the law, assuming extratextual sources are to any extent reliable for this purpose.") This is especially important in cases such as this where supporters of SB 408 argued that the bill was limited and moderate to assist its passage in the legislature, but now assert expansive interpretations. *See* CUB/ICNU Legislative Paper "*Utility Customers Ask for Fairness and Equity: Taxes Collected Must Align with Taxes Paid Vote Yes on SB 408-C*," attached to Opening Brief of PacifiCorp and Avista at Exhibit B (stating that, under SB 408, "Nothing in utility ratemaking is changed. Nothing in tax policy is changed.")

For this reason, the cited testimony of CUB, ICNU and Dan Meek should not be given as much weight as the testimony of the bill's sponsors, especially when the testimony is contradictory or incomplete. For example, CUB's citation to Mr. Early's testimony to the House State and Federal Affairs Committee on July 26, 2005 omits the following testimony of Mr. Early from that day supporting a stand-alone attribution approach, not a loss allocation approach:

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

> "What's different about our bill, is our bill gets to the heart of the question. In that same fact situation [where the utility's tax expense is $50 million] what we're truing-up is, we're saying is we want to match the dollars collected from rate payers with the tax dollars by the utility and attributable to regulated operations. So, the Commission looks at the $500 million and asks itself what portion of that $500 million was attributable to regulated operations in Oregon and that answer's going to be, it's going to be $50 million. So, then it says, well, it did collect and did pay to taxing authorities the amount of taxes collected. So, in that case, the adjustment is, there would be no adjustment, because in fact what was expected to happen, did happen. It collected $50 million and it paid $50 million."

CUB also cites the testimony of Vickie Walker that "[I]t is important that the Commission not allocate to the utility[] credit for income taxes paid to the government by the consolidated group, that is more than the amount of income tax payments properly attributed to the utility." This testimony supports the PacifiCorp/Avista position that the "properly attributed" language was designed to ring-fence the utility and prevent cross-subsidization, a design that requires a stand-alone attribution approach.

E. CUB's Argument That the PacifiCorp/Avista Approach "Double-Counts Taxes" is Unfounded.

CUB argues that the PacifiCorp/Avista interpretation of "properly attributed" would result in a double-count of taxes collected when there are two or more utilities in the affiliated group and the sum of their stand-alone tax liabilities is greater than the consolidated tax liability. CUB Opening Brief at 9. CUB's argument is based on a hypothetical, not actual, scenario. At present, there are no Oregon utilities that are part of a corporate family that contains additional Oregon utilities.[4] An Oregon utility that has a non-Oregon utility affiliate does not implicate the CUB "double count" issue because the non-Oregon utility is not subject to SB 408.

[4] CUB presents its argument on page 9 of its brief with respect to "two utilities to which this rule applies," and also presents the argument, at page 15, with respect to affiliated regulated utilities operating in Oregon and other states.

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

III. SB 408 DOES NOT REQUIRE THAT THE COMMISSION, IN DETERMINING THE AMOUNTS IDENTIFIED IN SECTION 13(E)(B) AND (C) USE THE NUMBERS CALCULATED FROM TEST YEAR DATA THAT THE COMMISSION HAS PREVIOUSLY AUTHORIZED

PacifiCorp and Avista join in the Comments of Northwest Natural Gas Company re Section 3(13)(e)(B) and (C) of SB 408 on this issue.

IV. CONCLUSION

PacifiCorp and Avista urge adoption of the statutory interpretation of SB 408 outlined above and in its Joint Opening Comments. PacifiCorp and Avista's interpretation of SB 408 gives effect to the legislature's intent, as expressed in the text of the statute and in the legislative history.

DATED: November 10, 2005.

STOEL RIVES LLP

Katherine A. McDowell
Sarah J. Adams Lien
Attorneys for PacifiCorp

AVISTA CORPORATION

David J. Meyer
Attorney for Avista Corp.

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480