# Davison Van Cleve PC

# Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com Suite 400 333 SW Taylor Portland, OR 97204

October 11, 2012

# Via Electronic Mail and FedEx

**Public Utility Commission** Attn: Filing Center 550 Capitol St. NE #215 P.O. Box 2148 Salem OR 97308-2148

> In the Matter of PACIFICORP 2013 Request for a General Rate Revision Re:

Docket No. UE 246

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Objection to Cross Examination Exhibits on behalf of the Industrial Customers of Northwest Utilities in the abovereferenced Docket.

Thank you for your assistance, and please do not hesitate to contact our office if you have any questions.

Sincerely yours,

/s/ Sarah A. Kohler Sarah A. Kohler

Enclosures

Service List cc:

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Objection to Cross Examination Exhibits on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 11th day of October, 2012.

/s/ Sarah A. Kohler Sarah A. Kohler

(W) PACIFIC POWER & LIGHT

SARAH WALLACE SENIOR COUNSEL 825 NE MULTNOMAH STE 1800 PORTLAND OR 97232 sarah.wallace@pacificorp.com

(W) PACIFICORP

OREGON DOCKETS 825 NE MULTNOMAH STE 1800 PORTLAND OR 97232 oregondockets@pacificorp.com

(W) DEPARTMENT OF JUSTICE

MICHAEL T WEIRICH BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@doj.state.or.us

(W) BOEHM KURTZ & LOWRY

KURT J BOEHM JODY KYLER 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com jkyler@bkllawfirm.com

(W) ENERGY STRATEGIES LLC

KEVIN HIGGINS 215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com (W) PACIFIC POWER & LIGHT

R. BRYCE DALLEY 825 NE MULTNOMAH STE 2000 PORTLAND OR 97232 bryce.dalley@pacificorp.com

(W) PUBLIC UTILITY COMMISSION OF OREGON

DEBORAH GARCIA PO BOX 2148 SALEM OR 97308-2148 deborah.garcia@state.or.us

(W) PORTLAND GENERAL ELECTRIC

RANDY DAHLGREN – 1WTC0702 DOUGLAS C TINGEY – 1WTC13 121 SW SALMON ST PORTLAND OR 97204 pge.opuc.filings@pgn.com doug.tingey@pgn.com

(W) CITIZENS' UTILITY BOARD OF OREGON

OPUC DOCKETS ROBERT JENKS G. CATRIONA MCCRACKEN 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org bob@oregoncub.org catriona@oregoncub.org

(W) REGULATORY & COGENERATION SERVICES INC

DONALD W SCHOENBECK 900 WASHINGTON ST STE 780 VANCOUVER WA 98660-3455

dws@r-c-s-inc.com

#### (W) SIERRA CLUB

JEFF SPEIR 85 SECOND ST., 2ND FLR SAN FRANCISCO CA 94105 jeff.speir@sierraclub.org

#### (W) SYNAPSE ENERGY

JEREMY FISHER 485 MASSACHUSETTS AVE., STE 2 CAMBRIDGE MA 02139 jfisher@synapse-energy.com

# (W) RENEWABLE NORTHWEST PROJECT

MEGAN WALSETH DECKER JIMMY LINDSAY 421 SW 6TH AVE #1125 PORTLAND OR 97204-1629 megan@rnp.org jimmy@rnp.org

# (W) KLAMATH WATER AND POWER AGENCY

HOLLIE CANNON 735 COMMERCIAL ST STE 4000 KLAMATH FALLS OR 97601 hollie.cannon@kwapa.org

# (W) WILLIAM GANONG

514 WALNUT AVENUE KLAMATH FALLS OR 97601 wganong@aol.com

#### (W) SIERRA CLUB LAW PROGRAM

GLORIA D SMITH 85 SECOND STREET SAN FRANCISCO CA 94105 gloria.smith@sierraclub.org

#### (W) ROBERTSON-BRYAN, INC

STUART ROBERTSON 9888 KENT STREET ELK GROVE CA 95624 stuart@robertson-bryan.com

# (W) NW ENERGY COALITION

WENDY GERLITZ 1205 SE FLAVEL PORTLAND OR 97202 wendy@nwenergy.org

#### (W) ESLER STEPHENS & BUCKLEY

JOHN W STEPHENS 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com; mec@eslerstephens.com

# BEFORE THE PUBLIC UTILITY COMMISSION

# **OF OREGON**

**UE 246** 

In the Matter of PACIFIC POWER & LIGHT dba PACIFICORP	THE INDUSTRIAL CUSTOMERS OF
	) NORTHWEST UTILITIES OBJECTION
2013 Request for a General Rate Revision	) TO EXHIBITS ) )

Pursuant to the Administrative Law Judge ("ALJ") Grant's September 20, 2012

Memorandum, the Industrial Customers of Northwest Utilities ("ICNU") identifies the following

PacifiCorp exhibits that ICNU objects to their admission into the record in this proceeding:

PAC/2316	Portland General Electric Company, Rebuttal Testimony of Tinker-Schue-Drennan in Dockets UE 180, UE 181, and UE
	184
	Portland General Electric Company, Sursurrebuttal
PAC/2317	Testimony of Tinker-Schue-Drennan in Dockets UE 180, UE
	181, and UE 184
PAC/2318	Portland General Electric Company, Sursurrebuttal
	Testimony of Lesh in Dockets UE 180, UE 181, and UE 184
PAC/2319	Portland General Electric Company, Direct Testimony of
	Pope in Dockets UE 180, UE 181, and UE 184
PAC/2320	Portland General Electric Company, Rebuttal Testimony of
	Pope in Dockets UE 180, UE 181, and UE 184
PAC/2323	Wyoming Industrial Energy Consumers, Direct Testimony of
	Randall Falkenberg in Wyoming Docket 20000-368-EA-10,
	September 10, 2012

The witnesses and any testimony that is submitted as a cross examination exhibit should appear at the hearing and be subject to cross examination. These cross examination exhibits are testimony and documents from separate proceedings, and the majority of the witnesses (Tinker, Drennan, Lesh, Pope, and Falkenberg) are not appearing in this proceeding.

# PAGE 1 – ICNU OBJECTION TO EXHIBITS

Neither Portland General Electric Company nor the Wyoming Industrial Energy Consumers

("WIEC") are appearing at the hearing, and WIEC is not even a party in this proceeding. In

addition, these cross examination exhibits are not relevant, as these witnesses and parties are not

appearing at the hearing and their testimony addresses issues from other proceedings.

Depending upon the course of the October 15-16 hearing, ICNU reserves the right to object to

the admission of other cross examination exhibits and raise additional objections to the above

identified exhibits.

Dated this 11th day of October, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Melinda J. Davison

Irion A. Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

mid@dvclaw.com

ias@dvclaw.com

Of Attorneys for the Industrial Customers of

Northwest Utilities

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