

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 246**

In the Matter of)	
)	
PACIFICORP)	SIERRA CLUB’S CROSS-
)	EXAMINATION STATEMENT AND
Request for a General Rate Revision)	LIST OF EXHIBITS TO BE
)	ENTERED INTO THE RECORD

In accordance with the Joint Prehearing Conference Memorandum issued by Chief Administrative Law Judge Michael Grant on September 20, 2012, Sierra Club hereby submits its cross-examination statement and list of exhibits to be entered into the record.

Sierra Club Cross-Examination Statement:

Sierra Club intends to cross-examine the following witnesses:

<u>Party</u>	<u>Witness</u>	<u>Estimated Time</u>
PacifiCorp	Chad Teply	1-hour
PacifiCorp	Cathy Woollums	1-hour

Sierra Club Pre-Filed Exhibits in UE 246:

Exhibit Sierra Club/	100	Fisher		Direct Testimony of Jeremy Fisher, Ph.D.
Exhibit Sierra Club/	101	Fisher		Curriculum Vitae Jeremy I. Fisher, Ph.D.
Exhibit Sierra Club/	102	Fisher		CONFIDENTIAL 2008 Strategic Asset Plan: Naughton Power Plant
Exhibit Sierra Club/	103	Fisher		CONFIDENTIAL 2009 Strategic Asset Plan: Naughton Power Plant
Exhibit Sierra Club/	104	Fisher		SO2 Milestones and Emission Trends New Mexico, Utah, Wyoming

Exhibit Sierra Club/	105	Fisher		Naughton Permit No. MD-5156 (Note: Originally designated as confidential. This document is public.)
Exhibit Sierra Club/	106	Fisher		BART Analysis for Naughton Unit 1 2007
Exhibit Sierra Club/	107	Fisher		BART Analysis for Naughton Unit 2 2007
Exhibit Sierra Club/	108	Fisher		Addendum to Naughton Unit 1 BART Report (2008)
Exhibit Sierra Club/	109	Fisher		CONFIDENTIAL APR#: 10003745 Naughton Unit 1 FGD 2009
Exhibit Sierra Club/	110	Fisher		CONFIDENTIAL APR#: 10003746 Naughton Unit 2 FGD 2009
Exhibit Sierra Club/	111	Fisher		Wyoming DEQ Air Quality Division BART Analysis for Naughton AP-6042
Exhibit Sierra Club/	112	Fisher		PacifiCorp's Emissions Reductions Plan 2010
Exhibit Sierra Club/	113	Fisher		EPA Comments on Naughton AP-9861
Exhibit Sierra Club/	114	Fisher		CONFIDENTIAL PacifiCorp Control Report 2003
Exhibit Sierra Club/	115	Fisher		CONFIDENTIAL Air Quality Reference Case Investments 2005
Exhibit Sierra Club/	116	Fisher		CONFIDENTIAL Accumulated NPV in Naughton PVR(d)
Exhibit Sierra Club/	117	Fisher		CONFIDENTIAL 2009 Strategic Asset Plan: Hunter Power Plant
Exhibit Sierra Club/	118	Fisher		Sierra Club Data Request 1.36
Exhibit Sierra Club/	119	Fisher		CONFIDENTIAL 2009 Strategic Asset Plan: Carbon Power Plant
Exhibit Sierra Club/	200	Steinhurst		Direct Testimony of William Steinhurst, Ph.D.
Exhibit Sierra Club/	201	Steinhurst		Résumé of William Steinhurst, Ph.D.
Exhibit Sierra Club/	300	Fisher		Surrebuttal Testimony of Jeremy Fisher, Ph.D.
Exhibit Sierra Club/	301	Fisher		CONFIDENTIAL: Naughton 1&2 Present Value Revenue Requirement Difference Data
Exhibit Sierra Club/	400	Steinhurst		Surrebuttal Testimony of William Steinhurst, Ph.D.

Sierra Club Exhibits to Offer into the Record:

Exhibit Sierra Club/	500	Cross Exhibit		Wyoming DEQ Air Quality Division BART Analysis for Dave Johnston AP-6041 (<i>Ref. pp. 1-2, Purpose of Application; pp. 47-50 BART Conclusions</i>)
Exhibit Sierra Club/	501	Cross Exhibit		Wyoming DEQ Air Quality Division BART Analysis for Wyodak AP-6043 (<i>Ref. pp. 1-2, Purpose of Application; pp. 11-14, Evaluation of PM Control Technologies; pp. 35-38, BART Conclusions</i>)
Exhibit Sierra Club/	502	Cross Exhibit		"Burlington Northern slowed by empty coal cars," Wall Street Journal Market Watch, July 18, 2012
Exhibit Sierra Club/	503	Cross Exhibit		Feb. 28, 2007 Letter from Basin Electric to Wyoming DEQ re Laramie River Station (Filed in WY PSC Docket 10-2802)
Exhibit Sierra Club/	504	Cross Exhibit		Wyoming State Implementation Plan, Regional Haze, Jan. 7, 2011 (<i>Ref. pp. 9-19, Section C Stationary Sources Part A-Milestones and Determination of Program Trigger and Part B-Pre-Trigger Emissions Tracking Requirements; p. 113, Appendix B, WYDEQ Chapter 14, Section 2(k)(i)(A)(I)</i>)
Exhibit Sierra Club/	505	Cross Exhibit		WRAP SO2 Milestone Tracking Process Audit, 2011 Review (<i>Ref. p. 2, Current emissions are well below milestones</i>)
Exhibit Sierra Club/	506	Cross Exhibit		Sierra Club Data Request 4.1
Exhibit Sierra Club/	507	Cross Exhibit		Wyoming DEQ Air Quality Division Naughton BART Permit No. MD-6042 (<i>Ref. pp. 2-6, Permit MD-6042</i>)
Exhibit Sierra Club/	508	Cross Exhibit		Excerpt: Naughton Power Plant Construction Permit Application, March 2008, Table 2.1
Exhibit Sierra Club/	509	Cross Exhibit		Excerpt: Utah State Implementation Plan, Section XX, Regional Haze, Sections D-E, April 6, 2011 (<i>Ref. pp. 7-9, Strategy for Stationary Sources of Sulfur Dioxide; pp. 15-18, BART Determinations</i>)
Exhibit Sierra Club/	510	Cross Exhibit		2010 Regional SO2 Emissions and Milestone Report Draft 1-19-12 (<i>Ref. p. 10, Table 3 - Average Sulfur Dioxide Emissions (2008, 2009, & 2010)</i>) ¹

¹ available at http://www.airquality.utah.gov/Air-Quality-Board/Packets/2012/March/ITEM_XI_b_RegionalHaze_Milestone.pdf

Exhibit Sierra Club/	511	Cross Exhibit		Sierra Club Data Request 1.22 and Attachment
Exhibit Sierra Club/	512	Cross Exhibit		Sierra Club Data Request 1.23
Exhibit Sierra Club/	513	Cross Exhibit		CONFIDENTIAL Sierra Club Data Request 5.1 and Attachment
Exhibit Sierra Club/	514	Cross Exhibit		CONFIDENTIAL Sierra Club Data Request 5.3a and Attachment
Exhibit Sierra Club/	515	Cross Exhibit		CONFIDENTIAL Sierra Club Data Request 5.4 and Attachment
Exhibit Sierra Club/	516	Cross Exhibit		Utah Docket 10-035-124, Sierra Club Data Requests 3.1-3.6
Exhibit Sierra Club/	517	Cross Exhibit		CONFIDENTIAL Excerpts: PacifiCorp Response to OPUC 138 1st Supplemental Attachment
Exhibit Sierra Club/	518	Cross Exhibit		CONFIDENTIAL Excerpts: OPUC 220-4 - Workpaper - Nau1&2 - Surrebuttal - 2014 Close - Aux load - APR CAI.xls

Dated: October 9, 2012

Respectfully submitted,

/s/ Travis Ritchie

Travis Ritchie
Sierra Club Environmental Law Program
85 Second St., 2nd Fl.
San Francisco, CA 94105
(415) 977-5727 Voice
travis.ritchie@sierraclub.org

Attorney for Sierra Club