BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 374

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

Request for a General Rate Revision

SIERRA CLUB'S AMENDED CROSS EXAMINATION STATEMENT AND LIST OF ACTIVE PARTICIPANTS

In accordance with Administrative Law Judge Allison Lackey's August 31, 2020

memorandum, Sierra Club hereby submits its first amended cross-examination statement and list

of active participants.

Sierra Club's First Amended Cross-Examination Statement

Sierra Club intends to cross-examine the following witnesses:

Party	Witness	Estimated Time and Subject Matter (Public Session)	Estimated Time and Subject Matter (Confidential Session)	Estimated Time and Subject Matter (Highly Confidential Session)	Sierra Club Counsel
PacifiCorp	Rick Link	1-hour; Jim Bridger SCRs – Gas Prices	2-hours; Jim Bridger SCRs – Gas Prices		Christopher Bzdok
PacifiCorp	Richard A. Vail	1-hour; Jim Bridger – Transmission Studies			Christopher Bzdok
PacifiCorp	James Owen		1.5-hours; Jim Bridger SCRs – Compliance Deadlines	30 minutes; Jim Bridger SCRs – Compliance Deadlines	Gloria Smith

Party	Witness	Estimated Time and Subject Matter (Public Session)	Estimated Time and Subject Matter (Confidential Session)	Estimated Time and Subject Matter (Highly Confidential Session)	Sierra Club Counsel
PacifiCorp	Dana Ralston	1-hour; Jim Bridger SCRs – Bridger Mine 30-minutes; Hayden SCRs	1-hour; Jim Bridger SCRs – Bridger Mine	15-minutes; Hayden SCRs	Rose Monahan

Sierra Club requests permission for limited screen sharing of cross-examination exhibits.

Individuals Calling-Into Confidential and Highly Confidential Sessions

 Christopher Bzdok (C, HC) – 231-946-4818; may display as 231-946-0044 or Olson, Bzdok & Howard; alternate 231-590-5667.

2. Gloria Smith (C, HC) – 415-308-9124

- 3. Rose Monahan (C, HC) 724-747-4139
- 4. Ana Boyd (C, HC) 413-717-7232
- 5. Jeremy Fisher (C, HC) 401-965-2951

List of Active Participants

All of Sierra Club's active participants are available on Friday, September 11, 2020.

- 1. Christopher Bzdok
- 2. Gloria Smith
- 3. Rose Monahan
- 4. Dr. Jeremy Fisher
- 5. Dr. Ezra Hausman

Additional Matters Related to the Evidentiary Hearing

The updated hearing procedures memorandum noted that the participants may need to rely on screen sharing in limited circumstances. Sierra Club concurs. As is evidenced by Sierra Club's exhibit list, we intend to rely heavily on record documents during cross examination of PacifiCorp witnesses. Many of these exhibits are spreadsheets, workpapers and other data-intensive reports. Based on recent virtual hearing experiences, we believe it would help the Commission were it to utilize screensharing capabilities at times so that all parties and the Commissioners are afforded the opportunity to view specific aspects of complex documents. This is especially true where the cross examiner is provided with a pointer so that all viewers can easily follow the questioning. In Sierra Club's view, this would not only result is a clearer final hearing transcript, it would speed along the proceedings.

Similarly, we ask the Commission to reconsider conducting all confidential and highly confidential questioning by phone lines. An audio-only hearing further compromises the interaction between witnesses, cross examining attorneys and questions concerning complex documentary evidence. We believe that many of the parties currently utilize secure video platforms that could be used for this purpose, and suggest an expedited conference with the parties and ALJ to discuss options, such as Microsoft Teams Rooms that has been successfully utilized in other proceedings.

Therefore, we request that the Commission reconsider using audio-only confidential hearing sessions.

Dated: September 4, 2020

Respectfully submitted,

/s/ Rose Monahan

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Attorney for Sierra Club