## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 390

In the Matter of

PACIFICORP, dba PACIFIC POWER, 2022 Transition Adjustment Mechanism

SIERRA CLUB'S CROSS-EXAMINATION STATEMENT

Pursuant to ALJ Rowe's May 10, 2021 Prehearing Conference Memorandum, Sierra Club submits this notice of intent to cross-examine witnesses at the August 26, 2021 hearing in the above-referenced docket. Sierra Club also reserves the right to conduct follow-up cross examination of any witnesses that are cross-examined by other parties or the Administrative Law Judge. Sierra Club intends to cross-examine the following witnesses:

Witness	<u>Party</u>	Sierra Club Counsel	Amount of Time Requested	<u>Subjects</u>
Douglas Staples	PacifiCorp	Rose Monahan	35 minutes	Purpose of the TAM; GRID modeling
Dana Ralston	PacifiCorp	Thien Chau	40 minutes	Jim Bridger and Bridger mine costs; CSAs and coal contracting practices
Daniel MacNeil	PacifiCorp	Rose Monahan	10 minutes	Hunter CSA and coal contracting practices

While Sierra Club does not anticipate requiring a confidential or highly confidential session for cross examination, the need may arise given the large amount of confidential and highly confidential information contained in testimony pertaining to the issues addressed by Sierra Club in this proceeding. Accordingly, Sierra Club respectfully requests the ability to move

into confidential and/or highly confidential session, specifically during Mr. Ralston's cross examination, should the need arise. Sierra Club does not anticipate needing more than 10 minutes in confidential and/or highly confidential session for Mr. Ralston's cross examination, if the need should arise at all.

Dated: August 20, 2021

Respectfully submitted,

/s/ Rose Monahan

Rose Monahan
Thien Chau
Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612
Telephone: (415) 977-5704
rose.monahan@sierraclub.org
thien.chau@sierraclub.org

Attorneys for Sierra Club