

# McDowell Rackner & Gibson PC



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August 19, 2010

## VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

**Re: Docket No. UM 1355**

Enclosed for filing in the above-referenced docket are an original and one copy of PacifiCorp's Cross-Examination Statement.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Amie Jamieson".

Amie Jamieson

cc: Service List

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of the foregoing document in  
3 Docket UM 1355 on the following named person(s) on the date indicated below by email  
4 and first-class mail addressed to said person(s) at his or her last-known address(es)  
5 indicated below.

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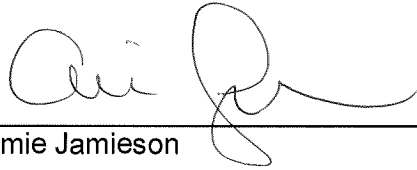
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DATED: August 19, 2010

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\_\_\_\_\_  
Amie Jamieson

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1355**

4 In the Matter of

5 THE PUBLIC UTILITY COMMISSION  
6 OF OREGON,

7 Investigation into Forecasting Forced Outage  
8 Rates for Electric Generating Units.

**PACIFICORP'S**  
**CROSS-EXAMINATION STATEMENT**

9 Pursuant to ALJ Allan Arlow's Ruling on August 6, 2010, PacifiCorp d/b/a Pacific  
10 Power submits this Cross-Examination Statement to the Public Utility Commission of Oregon  
11 (Commission).

12 In the event the Commission grants Portland General Electric Company's (PGE)  
13 Motion to Strike Portions of Staff Exhibit 400 (PGE's Motion), the Company does not intend to  
14 cross-examine any witnesses.

15 If the Commission does not grant PGE's Motion, PacifiCorp intends to briefly cross-  
16 examine Staff in aid of PacifiCorp's procedural objections to consideration of Staff's new collar  
17 proposal. Because Staff filed its new collar proposal only four business days ago and  
18 PacifiCorp has not had the ability to respond to Staff's proposal, PacifiCorp will be unable to  
19 cross-examine Staff on the merits of Staff's proposal at the hearing.

20 PacifiCorp's cross-examination of Staff should not be construed as a waiver of  
21 PacifiCorp's right to conduct discovery and provide testimony in response to Staff's new collar  
22 proposal, as discussed in PacifiCorp's Response in Support of PGE's Motion filed on this  
23 date. Cross-examination of Staff's witness cannot be considered a substitute for providing  
24 evidence in response to the new issues raised by Staff. PacifiCorp preserves all procedural  
25 and substantive objections to Staff's new collar proposal.

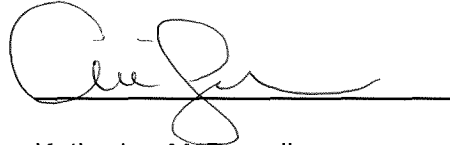
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1 In either event, PacifiCorp reserves the right to cross-examine witnesses to follow up  
2 on cross-examination performed by other parties.

3  
4 Dated: August 19, 2010

Respectfully submitted,

5 McDowell Rackner & Gibson PC

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8 Katherine McDowell  
9 Amie Jamieson

10 Attorneys for PacifiCorp  
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