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5 BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

6 UM 1002

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8 WAH CHANG,

9 Petitioner,

10 v.

11 PACIFICORP,

12 Respondent.  
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DECLARATION OF SUSAN K.  
ROBERTS in Support of PacifiCorp's  
Motion To Strike Petitioner's Direct  
Testimony and Exhibits

14 I, Susan K. Roberts, declare:

15 1. I am a paralegal with the law firm Perkins Coie LLP, which represents PacifiCorp  
16 in this matter.

17 2. I make this Declaration based on personal knowledge in support of PacifiCorp's  
18 Motion to Strike Petitioner's Direct Testimony and Exhibits ("Motion to Strike").

19 3. I reviewed Robert McCullough's direct testimony, WC/800, and all exhibits  
20 submitted by Wah Chang on December 15, 2005 and amended on December 29, 2005. I created  
21 a matrix which charted for each exhibit submitted by Wah Chang the following information: the  
22 form submitted to the OPUC (paper or electronic); the total number of paper pages submitted;  
23 whether or not the exhibits were cited in Mr. McCullough's testimony; if so, at what page, line,  
24 and/or footnote in WC/800 the exhibits were cited; and exactly how many pages of a multiple  
25 page exhibit were actually specifically referenced in Mr. McCullough's testimony. The  
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1 information in Appendices 1, 2, and 3 to the Motion to Strike are derived from the matrix I  
2 prepared.

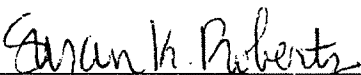
3 4. With respect to Wah Chang's electronic submissions, I submitted the eight (8)  
4 CD ROMs and one (1) DVD to BridgeCity Legal Copy Service. The staff at BridgeCity Legal  
5 performed diagnostic testing and provided a report for each CD ROM and the DVD indicating the  
6 total number of pages each CD ROM and the DVD would generate if printed on paper. I added  
7 this diagnostic information into my matrix and included the information in the number of pages  
8 submitted by Wah Chang to the OPUC.

9 5. Wah Chang submitted the testimony of Mr. McCullough, WC/800, and the  
10 testimony Deborah J. Stare, WC/900. Wah Chang submitted 110 additional exhibits to the  
11 OPUC. Of these 110 exhibits, I determined that 31 exhibits are not cited at all in Mr.  
12 McCullough's testimony. The number of pages in these 31 exhibits is over 100,000. This  
13 includes 1,000 pages of paper in 27 exhibits, as well as five (5) CD ROMs with four (4) exhibits  
14 holding data equivalent to 99,718 pages. Exhibit 1 hereto sets forth the details of this information.

15 6. There are thirty-one other lengthy exhibits of which Mr. McCullough cites only  
16 small portions of the pages submitted for each exhibit. These 31 exhibits comprise approximately  
17 17,246 pages of material, of which Mr. McCullough's testimony specifically cites only 102 pages.  
18 Details of this information are set forth in Appendix 1 attached to PacifiCorp's Motion to Strike,  
19 which I prepared.

20 *I hereby declare that the above statement is true to the best of my knowledge and belief,*  
21 *and that I understand it is made for use as evidence in court and is subject to penalty for perjury.*

22 DATED: March 16, 2006.

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24 \_\_\_\_\_  
25 Susan K. Roberts  
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**EXHIBIT 1**  
**WAH CHANG EXHIBITS SUBMITTED TO OPUC**  
**NOT CITED IN TESTIMONY**

Exhibit	Description	Format	No. of pages submitted
WC/818	Docket No. EL03-159-000, Ex. No. MID-4	Paper	1
WC/819	City of Redding Conversations	Paper	2
WC/823	City of Redding Conversations	Paper	2
WC/832	Enron Buy-Resales	Paper	1
WC/849	Exhibit 8A, 8B and 8C to Affidavit of Stanley K. Watters May 22, 2000	Paper	49
WC/852	Enron May 6 Data Request Supplemental Dated November 15, 2002	Paper	12
WC/902	Excel Spreadsheet Containing Hyperlinks to Audio Files of Trader Conversations Submitted to FERC and Cross-References to Transcript of FERC Submitted Conversations (WC/901) -- (on CD)	2 Disks	Disk 1 wav 102 files* Excel 16 pages  Disk 2 wav 147 files* Excel 16 pages
WC/904	Excel Spreadsheet Prepared by McCullough Research of Selected Audio Files from Wah Chang's Listening Project and Corresponding Transcripts (on CD)	Disk with Transcript, Audio and Spreadsheet	PDF 401 pages wmv 132 files* Excel 4 pages
WC/905	PC 075269 - Produced by PacifiCorp as Attachment 155 in Response to Wah Chang Data Requests - (on CD)	Disk	Excel 453
WC/906	PC 018963 - Produced by PacifiCorp as Attachment 99 in Response to Wah Chang Data Requests -- (on CD)	Disk	Excel zipped files 98,828 pages
WC/1000	Deposition Testimony of Greg Maxfield, taken October 17, 2005	Paper	303
WC/1001	Deposition Testimony of Valarie Sabo, taken October 24, 2005	Paper	144
WC/1002	Deposition Testimony of David Kvamme, taken October 24, 2005	Paper	39
WC/1003	Deposition Testimony of Jim Portouw, taken November 15, 2005	Paper	83

Exhibit	Description	Format	No. of pages submitted
WC/1004	Deposition Testimony of John Apperson, taken November 15, 2005	Paper	84
WC/1005	Deposition Testimony of Paul Kroger, taken November 16, 2005	Paper	32
WC/1010	Deposition Testimony of Gary Eldridge, taken November 30, 2005	Paper	122
WC/1103	Letter from Roy Hemmingway to The Honorable Patrick Wood, dated April 17, 2003	Paper	1
WC/1104	Letter from Hardy Myers to The Honorable Patrick Wood, dated July 12, 2004	Paper	2
WC/1105	Order on Complaint  Utah Associated Municipal Power Systems v. PacifiCorp, Docket No. EL 98-32-00  83 FERC ¶ 61, 337, issued June 29, 1998	Paper	6
WC/1106	Request for Rehearing and Clarification of PacifiCorp  PacifiCorp v. Reliant Energy Services, Inc. (Docket No. EL02-8000) Morgan Stanley Capital Group, Inc., (Docket No. EL 02-8100) Williams Energy Marketing & Trading Company, (Docket No. EL 02-82-00), and El Paso Merchant Energy, L.P. (Docket NO. EL 02-83-00) July 29, 2002	Paper	18
WC/1107	E-mail from JMF to Portland Shift re Project Red Congo Document number ECf000227557	Paper	1
WC/1108	Letter from Edward Silliere of Dow Jones to "Gentlemen" RE: Guidelines for Participants, California-Oregon Border (COB) Electricity Price Index, dated February 1, 1995	Paper	5
WC/1110	Response of PacifiCorp to the FERC's Data Request, dated May 21, 2002  Affidavit of Stanley K. Watters on behalf of PacifiCorp	Paper	21
WC/1118	Supplemental Response of PacifiCorp to FERC's Data Request, dated May 21, 2002  Supplemental Affidavit of Stanley K. Watters on Behalf of PacifiCorp	Paper	9
WC/1119	Exhibit 2 to PacifiCorp's Response to FERC's Data Request, dated May 21, 2002	Paper	5

Exhibit	Description	Format	No. of pages submitted
WC/1121	E-mail: <ul style="list-style-type: none"> <li>• July 6, 2000, from Terry Hudgens to Stan Watters et al. re Cal ISO</li> <li>• September 8, 2000, from Keith Johnson to Alan Richardson et al. re Energy market Report-09/07/00</li> <li>• March 20, 2001, from Keith Johnson to Alan Richardson et al. re Energy Market Report-03/19/01</li> <li>• May 25, 2001, from Steven Wallace to Cory Anderson et al. re Downward Price Pressure</li> <li>• June 25, 2001, from John Apperson to Jim Portouw et al. re Effect of FERC Price Cap Order on Fundamentals</li> <li>• July 9, 2001, from Nathalie Wessling to Cory Anderson et al. re July 9 Bloomberg Power Lines Report</li> <li>• August 10, 2001 from Rob Goodman to Jean Wilson et al. re Scheduling Stateline</li> </ul>	Paper	26
WC/1122	Attachment 126(b) to PacifiCorp Data Response	Paper	4
WC/1123	List of PacifiCorp Traders and Organizational Chart	Paper	5
WC/1124	Responses of PacifiCorp to 5/8/00 FERC Data Request	Paper	19
WC/1127	PacifiCorp Response to Oregon Department of Justice Civil Investigative Demand, February 19, 2003	Paper	4
			<b>Total pages submitted</b> <b>100,718</b>

\* Files not included in total because type of files, if printed, would not print legibly

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**CERTIFICATE OF SERVICE**


I certify that I have this day served the foregoing document, encaptioned  
DECLARATION OF SUSAN K. ROBERTS IN SUPPORT OF PACIFICORP'S MOTION TO  
STRIKE PETITIONER'S DIRECT TESTIMONY AND EXHIBITS, by causing a copy to be sent  
via U.S. Mail and electronic mail to:

Richard H. Williams  
Milo Petranovich  
Lane Powell Spears Lubersky LLP  
Suite 2100  
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DATED: March 16, 2006.

**PERKINS COIE LLP**

By   
Lawrence H. Reichman, OSB No. 86083  
Chris Garrett, OSB No. 03100

Attorneys for PacifiCorp