

1 **BEFORE THE OREGON PUBLIC UTILITIES COMMISSION**

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3 **DR 10/UE 88/UM 989**

4 **In the Matters of**

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6 **The Application of Portland General Electric**  
7 **Company for an Investigation into Least**  
8 **Cost Plan Plant Retirement. (DR 10)**

9  
10 **Revised Tariffs Schedules for Electric**  
11 **Service in Oregon Filed by Portland General**  
12 **Electric Company. (UE 88)**

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15 **Portland General Electric Company's**  
16 **Application for an Accounting Order and for**  
17 **Order Approving Tariff Sheets Implementing**  
18 **Rate Reduction. (UM 989)**

**ADDITIONAL CROSS-**  
**EXAMINATION STATEMENT**  
**OF UTILITY REFORM**  
**PROJECT, ET AL. AND**  
**CLASS ACTION**  
**PLAINTIFFS**

**August 22, 2005**

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20  
21 PGE has requested that the Utility Reform Project (URP), et al., and the Class  
22 Action Plaintiffs provide a list of the topics to be addressed in the cross-examination  
23 of PGE witnesses.

24 **Lesh**

25 history of Trojan

26 limits on assumed future knowledge of Commission

27 regulatory and ratemaking context

28 relationship between convention and declaratory ruling

29 timing of UE 88 rate requests in light of pending appeals of SR 10

30 effect of UE 88 decision on PGE stock

31 consequences of "underearning"

1 how uncollected one-year amortization is retroactively possible  
2  
3 effect of risk on cost of capital  
4  
5 effect of PGE's corporate structure on cost of capital  
6  
7 use of a hypothetical capital structure  
8  
9 proposed reconsideration of net benefit test  
10  
11 SAVE incentive  
12  
13 plant asset classification  
14  
15 effect of allocating Boardman gain to Trojan  
16  
17 effect of deferring variable power costs  
18  
19 allowing recovery of implied interest costs  
20  
21 comparison of criteria and scenarios  
22  
23 witness qualifications  
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25  
26 **Dalhgren**  
27  
28 alleged ratemaking process  
29  
30 integrated resource planning  
31  
32 regulatory incentives  
33  
34 sequence of events leading to permanent closure of Trojan  
35  
36 characterization of IRP net benefit analyses  
37  
38 effect of applying \$20 million of Boardman gain to Trojan  
39  
40 effect of UM 989 on rates  
41  
42 nonpayment of assumed income taxes

1 witness qualifications  
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3  
4 **Tinker/Schue/Hager**  
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6 impacts on later rate periods  
7  
8 characterization of the benefits stripped from ratepayers by UM 989  
9  
10 clarification on various number as to nominal or present value or something  
11 else  
12  
13 calculation of hypothetical revenue requirements  
14  
15 real v. regulatory assets  
16  
17 who bears the cost of voluntary risk  
18  
19 plant classification rationales  
20  
21 witness qualifications  
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23  
24 **Makholm**  
25  
26 witness qualifications  
27  
28 basis for investor knowledge of state law  
29  
30 assumptions regarding investor knowledge  
31  
32 effect of Enron purchase and ownership  
33  
34 history of PGE capital investments  
35  
36 characterizations of OPUC orders  
37  
38 cases from other states  
39  
40 what happens when investor expectations differ from reality  
41  
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1 **Quennoz/Peterson/Dahlgren**

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3 implications of considering assets needed for decommissioning and waste  
4 disposal to be in service  
5

6  
7 **Blaydon**

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9 knowledge of state law

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11 assumptions regarding investor knowledge of local law and conditions

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13 effect of Enron purchase and ownership

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15 history of PGE capital investments

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17 what happens when investor expectations differ from reality

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19 witness qualifications  
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22 **Hager**

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24 knowledge of state law

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26 assumptions regarding investor knowledge of local law and conditions

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28 effect of Enron purchase and ownership

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30 history of PGE capital investments

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32 what happens when investor expectations differ from reality

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34 witness qualifications  
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37 **Hess**

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39 knowledge of state law

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41 assumptions regarding investor knowledge of local law and conditions  
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effect of Enron purchase and ownership

history of PGE capital investments

what happens when investor expectations differ from reality

witness qualifications

Dated: August 22, 2005

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I served a true copy of the foregoing ADDITIONAL CROSS-EXAMINATION STATEMENT OF UTILITY REFORM PROJECT, ET AL. AND CLASS ACTION PLAINTIFFS by email to the email addresses shown below, which comprise the service list on the Commission's web site as of this day.

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Dated: August 22, 2005

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