## McDowell Rackner & Gibson PC

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August 9, 2011

## **VIA E-MAIL AND FIRST-CLASS MAIL**

PUC Filing Center
Public Utility Commission of Oregon
550 Capitol Street NE
Salem, OR 97308

Re: UE 227 - PacifiCorp's 2012 Transition Adjustment Mechanism

Attention Filing Center:

Enclosed for filing in the captioned docket are the original and one copy of PacifiCorp's Motion to Admit Testimony and the Supplemental Rebuttal Testimony of Frank C. Graves. A copy of this filing was served on all parties to this proceeding as indicated on the attached Certificate of Service.

The Company provided a copy of this motion and supplemental rebuttal testimony to parties to this proceeding on August 8, 2011, consistent with the requirement in OAR 860-001-0420(3) to confer prior to filing a procedural motion. The Industrial Customers of Northwest Utilities and the Citizens' Utility Board of Oregon informed the Company that they oppose the motion. As of the time of filing, Commission Staff and Noble Americas Energy Solutions, LLC had not informed the Company of their positions on the motion.

Please contact me with any questions.

Very truly yours,

Amie Jamieson

**Enclosures** 

cc: Service List

## CERTIFICATE OF SERVICE 1 2 I hereby certify that I served a true and correct copy of the foregoing document in 3 UE 227 on the following named person(s) on the date indicated below by email addressed 5 Ed Durrenburberger Jason W. Jones, Assistant AG 6 Public Utility Commission of Oregon Department of Justice ed.durrenberger@state.orus jason.w.jones@state.or.us 7 **Gregory Marshall Adams Oregon Dockets** 8 Richardson & O'Leary **PacifiCorp** oregondockets@pacificorp.com greg@richardsonandoleary.com 9 Donald W. Schoenbeck Gordon Feighner Regulatory & Cogeneration Services, Inc. Citizens' Utility Board of Oregon 10 dws@r-c-s-inc.com Gordon@oregoncub.org 11 Robert Jenks Maury Galbraith Citizens' Utility Board of Oregon **Public Utility Commission** 12 bob@oregoncub.org maury.galbraith@state.or.us 13 G. Catriona McCracken **Greg Bass** Citizens' Utility Board of Oregon 14 Nobel Americas Energy Catriona@oregoncub.org Solutions, LLC 15 gbass@noblesolutions.com Kevin Higgins 16 Michael E. Early **Energy Strategies LLC Industrial Customers of Northwest** 17 khiggins@energystrat.com Utilities mearly@icnu.org 18 Irion A. Sanger 19 Davison Van Cleve ias@dvclaw.com 20 21 Wendy McIndoo, Office Manager 22 DATED: August 9, 2011 23 24 25

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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON		
2	UE 227		
3			
4	In the Matter of:	MOTION TO ADMIT TESTIMONY	
5	PACIFICORP, dba PACIFIC POWER		
6	2012 Transition Adjustment Mechanism		
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8	Pursuant to OAR 860-001-0420, PacifiCorp offers the Supplemental Rebuttal		
9	Testimony of Frank C. Graves in this proceeding. PacifiCorp previously offered testimony		
10	filed by Mr. Graves on behalf of Rocky Mountain Power, a division of PacifiCorp, as Exhibit		
11	PPL/405 to Mr. Stefan Bird's rebuttal testimony filed on July 29, 2011. Mr. Graves'		
12	supplemental rebuttal testimony affirms that his testimony filed as Exhibit PPL/405 is true and		
13	correct and that he adopts and sponsors that testimony in this proceeding. The Company		
14	also confirms that Mr. Graves will be available at the September 8, 2011 hearing in this		
15	proceeding.		
16	This motion and supplemental testimony respond to data requests served by the		
17	Industrial Customers of Northwest Utilities (ICNU 13.24 and 13.25), which inquire about Mr.		
18	Graves' appearance in this case and his availability for cross examination. This supplemental		
19	testimony clarifies that the Company intends to make Mr. Graves available as a witness in this		
20	case.		
21	Mr. Graves' supplemental rebuttal testimony does not include any additional		
22	substantive testimony and simply adopts and affirms his Utah testimony previously provided to		
23	the parties on July 29, 2011. The Company filed this testimony in part to respond to the		
24	Citizens' Utility Board of Oregon's reliance on other testimony from the Company's Utah rate		
25	case. See Jenks-Feighner, Exhibit 106. Therefore, parties are not prejudiced by the		
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1	admission of the supplemental rebuttal testimony, which furthers the orderly development of	
2	the record in this case.	
3	For the foregoing reasons, the Company requests that the Public Utility Commission of	
4	Oregon accept the Supplemental Rebuttal Testimony of Frank C. Graves in this proceeding.	
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6	DATED: August 9, 2011.	
7		Cult
8		Katherine McDowell Amie Jamieson
9		Attorneys for PacifiCorp
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