

# McDowell Rackner & Gibson PC



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September 13, 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 above captioned docket is the Motion to Admit Affidavit and Exhibits and the Affidavit of Stefan A. Bird and accompanying confidential exhibits. Confidential material in the affidavit has been shaded and has been provided along with confidential exhibits in a separate envelope.

Also provided in response to parties' requests at the hearing is a new version of PPL Cross Exhibit/900. While PacifiCorp provided both confidential and redacted versions of the exhibit at the hearing, this version facilitates review of the exhibit by providing one version with confidential material on yellow paper and non-confidential material on white paper. The confidential material associated with PPL Cross Exhibit/900 is included in the separate envelope along with the confidential affidavit materials.

Please contact me with any questions.

Very truly yours,

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

Amie Jamieson

Enclosures

cc: Service List

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

3 **UE 227**

4 In the Matter of:

5 PACIFICORP, dba PACIFIC POWER  
6 2012 Transition Adjustment Mechanism

**MOTION TO ADMIT AFFIDAVIT AND  
EXHIBITS**

7  
8 Pursuant to OAR 860-001-0420, PacifiCorp moves for the Affidavit of Stefan A. Bird  
9 and accompanying exhibits to be admitted into the record in this proceeding. Mr. Bird's  
10 affidavit provides the information and exhibits in accordance with Administrative Law Judge  
11 Lisa Hardie's rulings and direction at the hearing in this proceeding on September 8, 2011.

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14  
15 DATED: September 13, 2011.



Katherine McDowell  
Amie Jamieson

Attorneys for PacifiCorp


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**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing document in UE 227 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

- |   |   |
|---|---|
| Ed Durrenburger<br>Public Utility Commission of Oregon<br>ed.durrenberger@state.or.us | Jason W. Jones, Assistant AG<br>Department of Justice<br>jason.w.jones@state.or.us    |
| Gregory Marshall Adams<br>Richardson & O'Leary<br>greg@richardsonandoleary.com        | Oregon Dockets<br>PacifiCorp<br>oregondockets@pacificorp.com                          |
| Gordon Feighner<br>Citizens' Utility Board of Oregon<br>Gordon@oregoncub.org          | Donald W. Schoenbeck<br>Regulatory & Cogeneration Services, Inc.<br>dws@r-c-s-inc.com |
| Maury Galbraith<br>Public Utility Commission<br>maury.galbraith@state.or.us           | Robert Jenks<br>Citizens' Utility Board of Oregon<br>bob@oregoncub.org                |
| Greg Bass<br>Nobel Americas Energy<br>Solutions, LLC<br>gbass@noblesolutions.com      | G. Catriona McCracken<br>Citizens' Utility Board of Oregon<br>Catriona@oregoncub.org  |
| Irion A. Sanger<br>Davison Van Cleve<br>ias@dvclaw.com                                | Kevin Higgins<br>Energy Strategies LLC<br>khiggins@energystrat.com                    |

DATED: September 13, 2011

  
Wendy McIndoo, Office Manager



1 clarification. The changes from the rebuttal to surrebuttal filing do not reflect any new  
2 hedges or changes in hedge volume. The only difference between the rebuttal and  
3 surrebuttal is the change in the load forecast, which reduced the Company's projected  
4 natural gas requirements for the test period. Because the "All Gas % Hedged" figure  
5 on ICNU Confidential Cross Exhibit/117 is calculated from the projected natural gas  
6 requirement for the test period, the reduction in the gas requirement increased the  
7 percent hedged figure for the test period.

8 4. At the hearing, in lieu of admitting ICNU Cross Exhibit/118, the ALJ asked me to  
9 respond, subject to check, on whether the fixed price costs of the 96 hedges in the  
10 Company's original filing was approximately [REDACTED]. I have checked this number  
11 and do not accept its accuracy. The number is overstated by [REDACTED] because it  
12 includes hedge volumes outside the test period and incorrectly includes sales as  
13 purchases.

14 5. At the hearing, the Company introduced Confidential PPL Cross Exhibit/901, subject to  
15 ICNU's check of the numbers contained in the two gray boxes. I understand that ICNU  
16 accepts the numbers in the top box marked "cumulative." I understand that ICNU  
17 disputes the characterization of the lower box marked "below cap volumes," although it  
18 has not contested the specific computations. Because all of the numbers in this lower  
19 gray box can be easily computed from ICNU's underlying workpaper, to avoid further  
20 controversy, the Company is resubmitting Confidential PPL Cross Exhibit/901 without  
21 the gray box entitled "Below Cap Volumes." All other material in the exhibit remains  
22 the same. I have attached this revised exhibit as Confidential Exhibit 2.

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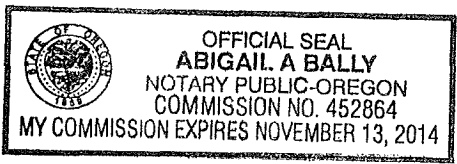
25 /// /// ///


1 I declare under penalty of perjury under the laws of the state of Oregon that the  
2 foregoing is true and correct based on my information and belief.

3 SIGNED this 13<sup>th</sup> day of September, 2011, at Portland, Oregon.

4 Signed: 

5 SUBSCRIBED AND SWORN to before me this 13<sup>th</sup> day of September, 2011.



  
Notary Public, State of Oregon  
My Commission Expires 11-13-14

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 227**

**PACIFICORP**

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**CONFIDENTIAL**  
**Exhibit 1 Accompanying Affidavit of Stefan A. Bird**

**September 13, 2011**

**THIS EXHIBIT IS  
CONFIDENTIAL AND WILL  
BE PROVIDED IN A  
SEPARATELY SEALED  
ENVELOPE PURSUANT TO  
GENERAL PROTECTIVE  
ORDER NO. 10-069**



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 227**

**PACIFICORP**

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**CONFIDENTIAL**  
**Exhibit 2 Accompanying Affidavit of Stefan A. Bird**

**September 13, 2011**

**THIS EXHIBIT IS  
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