

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of)	CITIZENS' UTILITY BOARD
)	OF OREGON'S MOTION TO AMEND
PACIFICORP, dba PACIFIC POWER)	LIST OF EXHIBITS TO BE ENTERED
)	INTO THE RECORD
Request for a General Rate Revision)	
)	

The Citizens' Utility Board of Oregon ("CUB") hereby moves the Public Utility Commission of Oregon ("Commission") for leave to amend CUB's List of Exhibits To Be Entered Into the Record in docket UE 246. Pursuant to ALJ Grant's Joint Prehearing Conference Memorandum issued on September 20, 2012, CUB filed its Cross-Examination Statement and List of Exhibits To Be Entered Into the Record with the Commission on October 9, 2012. On October 11, 2012, PacifiCorp filed its objections to CUB's List of Exhibits To Be Entered Into the Record. CUB consulted with Counsel for PacifiCorp Ms. Sarah Wallace on October 10, and again on October 11, 2012 in an effort to resolve this Exhibit List dispute but without success. Accordingly, it has become necessary for CUB to address additional issues through cross-examination, necessitating additional time, an additional witness, and additional cross-examination statements. CUB therefore respectfully moves the Commission for leave to amend CUB's List of Exhibits To Be Entered Into the Record in docket UE 246. CUB's Amended List of Exhibits To Be Entered Into the Record is attached to this motion.

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UE 246 - CITIZENS' UTILITY BOARD OF OREGON'S MOTION TO AMEND LIST OF EXHIBITS TO BE ENTERED INTO THE RECORD

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Dated this 11th day of October, 2012.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Catriona McCracken', with a stylized flourish at the end.

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UE 246 - CITIZENS' UTILITY BOARD OF OREGON'S MOTION TO AMEND LIST OF
EXHIBITS TO BE ENTERED INTO THE RECORD

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of)	
)	CUB’S AMENDED LIST OF EXHIBITS
PACIFICORP, dba PACIFIC POWER)	TO BE ENTERED INTO THE RECORD
Request for a General Rate Revision)	
_____)	

CUB herewith submits its Amended List of Exhibits in response to the Objections filed on October 11, 2012 by PacifiCorp. CUB is simultaneously amending its Cross Examination Statement also in response to PacifiCorp’s Objections to CUB’s Exhibit List.

CUB notes that it is also amending this Exhibit List to Request that Judicial Notice be taken of all documents on file with the Commission in Commission Docket LC 52.

CUB consulted with Counsel for PacifiCorp Ms. Sarah Wallace on October 10, and again on October 11, 2012 in an effort to resolve this Exhibit List dispute but without success.

Amendments to this Exhibit List are noted below in ~~strike-out format~~ and red highlight for ease of review.

CUB Pre-Filed Exhibits in UE 246

CUB 100 series

Exhibit CUB/100	Response Testimony of the Citizens’ Utility Board of Oregon
Exhibit CUB/101	Witness Qualification Statement
Exhibit CUB/102	MEHC 2010 Fixed Income Investor Conference Presentation
Exhibit CUB/103	CUB Data Request 11 to PacifiCorp

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Exhibit CUB/104	CUB Data Request 4 and 7 to PacifiCorp
Exhibit CUB/105	2011 Integrated Resource Plan Update (Confidential Version)
Exhibit CUB/106	Natural Gas update Summer 2012
Exhibit CUB/107	Jim Bridger 3 PacifiCorp's PVRR(d) Study "CY 2008 Thermal Operations Economic Decision Model 2008 (Q4) (Stand Alone Mode)"
Exhibit CUB/108	Sixth Northwest Conservation and Electric Power Plan Chapter 2
Exhibit CUB/109	Naughton Units 1 and 2 PacifiCorp's PVRR(d) Study "CY 2009 Thermal Operations Economic Decision Model 2009 (Q1) (Stand Alone Mode)"
Exhibit CUB/110	System Optimizer – 2011 IRP Update Coal Replacement Study
Exhibit CUB/111	CUB Data Request 20 to PacifiCorp
Exhibit CUB/112	Dave Johnston 4 PacifiCorp's PVRR(d) Study "CY 2007 Thermal Operations Economic Decision Model 2007 (Q3) (Stand Alone Mode)"
Exhibit CUB/113	Hunter Units 1 and 2 PacifiCorp's PVRR(d) Study "CY 2009 Thermal Operations Economic Decision Model 2009 (Q3) with Bonus Depreciation(Stand Alone Mode)"
Exhibit CUB/114	Wyodak Unit 1 PacifiCorp's PVRR(d) Study "CY 2009 Thermal Operations Economic Decision Model 2009 (Q2) (Stand Alone Mode)"

CUB 200 Series

Exhibit CUB/200	Rebuttal Testimony of the Citizens' Utility Board of Oregon
Exhibit CUB/201	CUB Data Request 7 to PUC Staff
Exhibit CUB/202	CUB Data Request 8 to PUC Staff
Exhibit CUB/203	CUB Data Request 2 to PUC Staff
Exhibit CUB/204	CUB Data Request 9 to PUC Staff
Exhibit CUB/205	CUB Data Request 11 to PUC Staff
Exhibit CUB/206	PGE's "Preliminary Comments on Proposed Regional Haze Rules" submitted to ODEQ December 17, 2008

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Exhibit CUB/207	CUB Comments on Proposed Regional Haze Rules submitted to ODEQ January 30, 2009
Exhibit CUB/208	PGE's "Decision Points Proposal for BART"
Exhibit CUB/209	PGE's "Boardman: Recent regulatory History"
Exhibit CUB/210	"Oklahoma, EPA, and PSO reach Agreement on Air Quality Rules" dated April 24, 2012/"PSO, State Reach Agreement With EPA On Emissions Reduction Plans" dated April 24, 2012
Exhibit CUB/211	CUB's August 2012 rebuttal Model Run of "PacifiCorp Thermal Model" (Naughton 1 and 2)
Exhibit CUB/212	"PacifiCorp Flue Gas Desulfurization System Naughton Units 1 and 2 Contract No. 3000060094"
Exhibit CUB/213	"Consultant: URS Corporation Work Release No. 3000056240 Exhibit A Project Schedule"

~~CUB Additional Exhibits to Offer into the Record~~

Exhibit No.	Witness	Party	Document Reference Information	No. of pages
CUB/300	Jenks	CUB	Supplementing CUB/Exhibit 210—September 26, 2012 Public Service Company of Oklahoma Press Release https://www.psoklahoma.com/info/news/view_release.aspx?release_ID=1309	1
CUB/301	Jenks	CUB	Project Proposal for Unit 1 Implementaion—Naughton Units 1 and 2 Flue Gas Desulphurization (FGD) System. Data Response Sierra 110 Confidential APR—10003745 WBS-SNAU2008 CCO4 Confidential.pdf	11
CUB/302	Jenks Teply	CUB PAC	APR 10010143 WBS-SNAU 2008 CC05 CONFIDENTIAL—PDF CONCRETE CHIMNEY—NAUGHTON UNITS 1 AND 2 FLUE GAS DESULPHURIZATION (FGD) SYSTEM October 23, 2008 Sierra Club 110 CONFIDENTIAL	11
CUB/303	Jenks Doak	CUB PAC	Response to Sierra Club DR 3.4—Attachment—Comments April 29, 2009 PacifiCorp Comments on Naughton Construction Permit AP5156 2009-04-29-Nau AP 5156 Comment Letter.pdf	8
CUB/304	Jenks Dunn	CUB PAC	Prepared Comments of Micheal Dunn, President and CEO, PacifiCorp Energy Wyoming Regional Haze Hearings—June 26 and 28,	7

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			2012—Response to Sierra Club DR 3.7, Comments of Micheal Dunn	
CUB/305	Jenks	CUB	Response to Sierra Club DR 2.1	1
CUB/306	Jenks Doak	CUB PAC	Email requesting Naughton construction permit by March or April 2009. Response to Sierra Club CR 1.12—Sierra Club 1.12/Naughton.zip/RE Wyodak and Naughton (1).msg	1
CUB/307	Jenks	CUB	IRP Supplemental Coal Replacement Study 9/21/2011—Confidential Attachment to CUB DR 6	22
CUB/308	Jenks	CUB	CUB Confidential Comments LC 48, November 3 2011	14
CUB/309	Jenks	CUB	BART Appeals Settlement Agreement Attachment OPUC 269	17
CUB/310	Jenks Teply	CUB PAC	Workpaper to Chad Teply Testimony—OR GRC 2012 CAI CAPITAL PROJECTS STUDY FOR NAUGHTON UNITS 1 & 2—Feb. 2009 CONFWorkpaper—Nau1&2—Feb 2009 Coal Study.doc	2
CUB/311	Jenks	CUB	Confidential Response to CUB Data Request 42	8
CUB/312	Jenks Teply	CUB PAC	2nd Supplement Response to CUB DR 44	1
CUB/313	Jenks Teply	CUB PAC	Response to Staff DR 343	1
CUB/314	Jenks Teply	CUB PAC	Response to Sierra Club DR 1.30	2
CUB/315	Jenks	CUB	Confidential Response to CUB DR 39—Attachment 3, 1st Supplemental Response	7
CUB/316	Jenks	CUB	Confidential Response to CUB DR 39—Attachment 4, 1st Supplemental Response	8

CUB Cross Examination Exhibits

Exhibit No.	Witness	Party	Document Reference Information	
CUB 400	Teply	PacifiCorp	UE 246 PAC Exhibit 502	
CUB/302	Teply	PAC	APR-10010143 WBS-SNAU 2008 CC05 CONFIDENTIAL – PDF CONCRETE CHIMNEY – NAUGHTON UNITS 1 AND 2 FLUE GAS DESULPHURIZATION (FGD) SYSTEM October 23, 2008 Sierra Club 110 CONFIDENTIAL	11
CUB/303	Teply	PAC	Response to Sierra Club DR 3.4 - Attachment -Comments April 29, 2009 PacifiCorp Comments on Naughton Construction Permit AP5156 2009-04-29- Nau AP 5156 Comment Letter.pdf	8

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CUB/304	Woollums	PAC	Prepared Comments of Micheal Dunn, President and CEO, PacifiCorp Energy Wyoming Regional Haze Hearings – June 26 and 28, 2012—Response to Sierra Club DR 3.7, Comments of Micheal Dunn	7
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CUB/306	Teply	PAC	Email requesting Naughton construction permit by March or April 2009. Response to Sierra Club CR 1.12 - Sierra Club 1.12/Naughton.zip/RE Wyodak and Naughton (1).msg	1
CUB/310	Teply	PAC	Workpaper to Chad Teply Testimony – OR GRC 2012 CAI CAPITAL PROJECTS STUDY FOR NAUGHTON UNITS 1 & 2 – Feb. 2009 CONFWorkpaper –Nau1&2 – Feb 2009 Coal Study.doc	2
CUB/312	Teply	PAC	2 nd Supplement Response to CUB DR 44	1
CUB/313	Teply	PAC	Response to Staff DR 343	1
CUB/314	Teply	PAC	Response to Sierra Club DR 1.30	2

As noted above CUB is also requesting that Judicial Notice be taken of all documents on file with the Commission in Docket LC 52.

Dated this 11th day of October, 2012.

Respectfully submitted,



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UE 246 –CUB'S AMENDED LIST OF EXHIBITS TO BE ENTERED INTO THE RECORD

UE 246 – CERTIFICATE OF SERVICE

I hereby certify that, on this 11th day of October, 2012, I served the foregoing **CITIZENS' UTILITY BOARD OF OREGON'S MOTION TO AMEND LIST OF EXHIBITS TO BE ENTERED INTO THE RECORD** in docket UE 246 upon each party listed in the UE 246 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sommer Templet". The signature is fluid and cursive, with the first name "Sommer" being more prominent than the last name "Templet".

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