

**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)	CROSS-EXAMINATION STATEMENT
)	
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 Cross-Examination Statement 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 Cross-Examination Statement in docket UE 246. CUB's Amended Cross-Examination Statement is attached to this motion

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UE 246 - CITIZENS' UTILITY BOARD OF OREGON'S MOTION TO AMEND CROSS-EXAMINATION STATEMENT

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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', written in a cursive style.

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	AMENDED CROSS-EXAMINATION
Request for a General Rate Revision)	STATEMENT OF THE CITIZENS'
)	UTILITY BOARD OF OREGON
_____)	

1 Pursuant to the Administrative Law Judge (“ALJ”) Grant’s September 20, 2012 Joint
2 Prehearing Conference Memorandum, and as a result of today’s PacifiCorp filing of its
3 Objections to CUB’s Exhibit List, CUB hereby submits its Amended Cross-Examination
4 Statement to the Public Utility Commission seeking permission to cross-examine witnesses
5 related to the documents to which PacifiCorp has now filed objections. CUB advised PacifiCorp
6 that it would be making this filing in an email sent on October 10, 2012, upon learning that
7 PacifiCorp intended to object to its exhibits. CUB notes that were PacifiCorp to decide to permit
8 CUB to submit these exhibits into the record without the need of cross-examination, then CUB
9 would only need to cross-examine Mr. Teply on the previously noticed CUB/Exhibit 400
10 (PAC/Exhibit 502). CUB has narrowed its Exhibit List to reduce the number of witnesses
11 required to be produced by PacifiCorp and those amendments are shown on the simultaneously
12 filed Amended Exhibit List.

Witness	Party	Subject Matter	Amount of Time
Chad A. Teply CUB/Exhibit 302, 303, 306, 310, 312 – 314 CUB/400 (PAC/Exhibit 502)	PacifiCorp	Pollution Control Investments	40 minutes
Cathy Woollums CUB/Exhibit 304	PacifiCorp	Pollution Control Investments	15

1 CUB also reserves the right to cross-examine any witness called for examination by any party,
2 the Commissioners or ALJ, regarding testimony that is elicited during the hearing.

3 As noted above, CUB is separately amending its Exhibit list to show deletion of certain
4 documents from that list.

5 CUB left a message for ALJ Pines seeking guidance as to how the Commission wishes
6 parties like CUB to respond to the objections filed against their Exhibit Lists - that is in writing
7 tomorrow Friday or orally at the Commission on Monday.

8 CUB understands that Judge Pines will be contacting the parties in that regard.

Dated this 11th day of October, 2012.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Catriona McCracken', written in a cursive style.

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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 CROSS-EXAMINATION STATEMENT** 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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