

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

In the Matter of
PACIFICORP, dba PACIFIC POWER
Request for a General Rate Revision.

STAFF'S MOTION TO SUPPLEMENT
ADMINISTRATIVE RECORD

Expedited Consideration Requested

Staff of the Public Utility Commission of Oregon (Staff) moves for leave to supplement the administrative record in this proceeding to include attachments to certain data requests not previously included in the record. Due to the specific circumstances in this case, including remote work conditions and the volume of data requests attached as exhibits to Staff's testimony, coupled with some misunderstandings related to documents included in the record, some attachments to certain data requests were inadvertently omitted from filing in Staff's direct testimony. Following the hearing in this case, Staff counsel became aware of the error, and therefore, seeks to include the following into the record in this case:

Staff Exhibit	Staff Witness	Supplemental Documents
Staff/305	Brian Fjeldheim	<ul style="list-style-type: none">Attachment to PacifiCorp's response to Staff DR 324Attachment to PacifiCorp's response to Staff's DR 325Attachment to PacifiCorp's response to Staff's DR 421
Staff/402	Heather Cohen	<ul style="list-style-type: none">Attachment to PacifiCorp's response to Staff DR 057

1			<ul style="list-style-type: none"> Attachment to response to Staff DR
2			057 (2 nd supplemental - Confidential)
3	Staff/702	Sabrina Soldavini	<ul style="list-style-type: none"> Attachment to PacifiCorp's Response
4			to Staff DR 277
5			

Staff further moves for admission of the above documents into the record in this proceeding.

Because they are attachments to data responses provided by PacifiCorp, a declaration attesting to their truthfulness on behalf of the Staff witness is not attached.

Because the record in this proceeding is closed, Staff seeks expedited treatment of its request with shortened response times. Pursuant to OAR 860-001-0420(2) and (6), Staff has conferred with the other parties to this proceeding. Calpine Energy Solutions LLC, ChargePoint, Klamath Water Users Association, Oregon Citizens' Utility Board, PacifiCorp, Small Business Utility Advocates, Tesla, Inc., Vitesse LLC and Walmart Inc. do not object to Staff's motion. At the time of filing, Staff had not heard from the Alliance of Western Energy Consumers and Fred Meyer.

DATED this 12th day of November, 2020.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

/s/ Sommer Moser

Sommer Moser, OSB No. 105260
Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon

Attachment OPUC 324

Attachment OPUC 325

And

Attachment OPUC 421

PacifiCorp

Attachment to OPUC Data Request 324a

		Composite Rate				
			6 mos 2019	2018	2017	
Sales to Ultimate Consumers	Oregon		\$ 661,031,528	\$ 1,279,806,988	\$ 1,318,341,847	(a)
Franchise Tax Expense	Oregon		\$ 15,583,008	\$ 30,081,587	\$ 30,722,628	(b)
Franchise Tax Factor (2017-2019 Avg. Last 3 Years)		2.35%	2.3574%	2.3505%	2.3304%	(c) = (b)/(a)
		30%(d) + 50%(e) + 20%(f)	(d)	(e)	(f)	

PacifiCorp

Attachment to OPUC Data Request 325a

2017 revenue reported to Oregon Department of Energy	\$ 1,338,363,317	(a)
Oregon Department of Energy Assessment based on 2017 revenue	\$ 1,723,510	(b)
Effective tax rate	0.1288%	(c) = (b)/(a)

	2010		2011		2012		2013		2014		2015	
Oregon franchise tax expense	\$	22,210,007	\$	25,327,095	\$	26,908,113	\$	27,490,971	\$	26,046,878	\$	28,784,862

Attachment OPUC 057

And

Confidential Attachment OPUC 057 2nd Supplemental

Are filed in electronic format

C. Please provide the level of reliability coordinator expense included in the Test Year. Please explain how the Company estimated the Test Year value and include any relevant work papers.

Base Period	4,476,552
Escalation Factor	2.15%
Test Period	<u>4,572,602</u>

Year	Month	Description	Amount
2018	7	Peak Reliability	324,435
2018	8	Peak Reliability	324,435
2018	9	Peak Reliability	324,435
2018	10	Peak Reliability	324,435
2018	11	Peak Reliability	324,435
2018	12	Peak Reliability	324,435
2019	1	Peak Reliability	421,657
2019	2	Peak Reliability	421,657
2019	3	Peak Reliability	421,657
2019	4	Peak Reliability	421,657
2019	5	Peak Reliability	421,657
2019	6	Peak Reliability	421,657
		Base Period	4,476,552

D. How are the costs of CAISO RC services allocated between PacifiCorp's jurisdictions? Please provide the amount allocated to each state in the Test Year.

Allocation Factor	SG								
<u>TOTAL</u>		<u>California</u>	<u>Oregon</u>	<u>Washington</u>	<u>Wyo-PPL</u>	<u>Utah</u>	<u>Idaho</u>	<u>Wyo-UPL</u>	<u>FERC</u>
100.0000%		1.5367%	26.0226%	7.8920%	11.8136%	43.9975%	5.8975%	2.8117%	0.0283%
4,572,602.45		70,267.28	1,189,911.53	360,871.56	540,189.53	2,011,830.68	269,667.84	128,568.19	1,295.83