

July 28, 2021

#### VIA ELECTRONIC FILING

Public Utility Commission of Oregon Attn: Filing Center 201 High Street SE, Suite 100 Salem, OR 97301-3398

# RE: UM 1102(18)—Application for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Application for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants.

If you have any questions, please contact Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

Etta Lockey

Vice President, Regulation and Community and Customer Solutions

Enclosures

## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1102(18)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants.

APPLICATION FOR REAUTHORIZATION OF DEFERRED ACCOUNTING

Under ORS 757.259 and OAR 860-027-0300, PacifiCorp, d/b/a Pacific Power, files this application (Application) with the Public Utility Commission of Oregon (Commission) for an order reauthorizing PacifiCorp to record and defer, on an ongoing basis, the cost of intervenor funding grants under ORS 757.259(3). PacifiCorp respectfully requests reauthorization for a 12-month period commencing August 1, 2021.

In support of this Application, and in accordance with OAR 860-027-0300(3) and (4), PacifiCorp states:

#### A. PacifiCorp

PacifiCorp is a public utility in the state of Oregon and is subject to the jurisdiction of the Commission with regard to rates, service, and accounting practices. PacifiCorp also provides retail electricity service in the states of California, Idaho, Utah, Washington, and Wyoming.

#### **B.** Statutory Authority

This Application is filed in accordance with ORS 757.259, which authorizes the deferral of expenses or revenues of a public utility for later incorporation in rates. ORS 757.259(3) allows for deferral of amounts provided in accordance with a financial assistance agreement entered into under ORS 757.072.

#### C. Communications

Communications regarding this Application should be addressed to:

PacifiCorp Oregon Dockets Matthew McVee

PacifiCorp Chief Regulatory Counsel

825 NE Multnomah St., Suite 2000 PacifiCorp

25 NE Multioman St., Suite 2000 Pacificor

Portland, OR 97232 825 NE Multnomah St., Suite 2000 Telephone: (503) 813-5934 Portland, OR 97232

Telephone: (503) 813-5934 Portland, OR 97232 Email: oregondockets@pacificorp.com Telephone: (503) 813-5585

Email: matthew.mcvee@pacificorp.com

In addition, PacifiCorp requests that all data requests regarding this Application be sent to the following:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center

PacifiCorp

825 NE Multnomah, Suite 2000

Portland, Oregon 97232

Informal questions may be directed to Cathie Allen, State Regulatory Affairs Manager, at (503) 813-5934.

#### D. Basis for Application

#### 1. Statutory Authority

ORS 757.072 authorizes the Commission to approve an agreement between an energy utility and a customer organization for intervenor funding. ORS 757.259(3) allows a utility to recover intervenor funding in rates through deferred accounting:

Upon request of the public utility, the commission by order shall allow deferral of amounts provided as financial assistance under an agreement entered into under ORS 757.072 for later incorporation in rates.

Deferred amounts under ORS 757.259(3) are not subject to the percentage of gross revenues limitation on amortization or other provisions of subsections (5), (6), (7), and (8) of ORS 757.259.

# 2. Commission Approval of the Intervenor Funding Agreement and the Multi-State Process Intervenor Funding Agreement

On July 2, 2003, per section 2 of the Intervenor Funding Act, the Commission issued Order No. 03-388 in docket AR 462, which, among other things, approved the Intervenor Funding Agreement among PacifiCorp, Portland General Electric Company, Northwest Natural Gas Company, Northwest Industrial Gas Users, Oregon Citizens' Utility Board of (CUB), and Industrial Customers of Northwest Utilities (ICNU), dated February 5, 2003. On December 19, 2007, the Commission issued Order No. 07-564 in docket UM 1357 approving the Amended and Restated Intervenor Funding Agreement that extended intervenor funding until December 31, 2012. On November 20, 2012, the Commission issued Order No. 12-452 in docket UM 1357 approving the Second Amended and Restated Intervenor Funding Agreement that extended intervenor funding until December 31, 2017. The Intervenor Funding Agreement sets forth the amount of funding to be contributed by each utility and the procedures for budget submittals by intervenors, Commission approval of budgets, and the payment of grants by utilities. Additionally, the Intervenor Funding Agreement allows intervenors to request grants at any time during the calendar year. On October 20, 2016, the Commission issued Order No. 15-335 in docket UM 1357 approving the Third Amended and Restated Intervenor Funding Agreement that increased funding levels for certain Commission proceedings related to Northwest Natural Gas Company and Avista Corporation. On January 17, 2018, the Commission issued Order No. 18-017 in docket UM 1929 approving the Fourth Amended and Restated Intervenor Agreement that continues the three funds from

which intervenor funding grants can be made and modified the amounts in each fund as reflected in the table below.

	PGE	Pacific Power	NW Natural	Cascade	Avista
CUB Fund	\$101,125	\$101,125	\$101,125	\$39,500	\$44,500
Preauthorized					
Matching Fund	\$72,738	\$72,738	\$72,738	\$37,950	\$37,950
Issue Fund	\$143,750	\$143,750	\$143,750	\$34,500	\$70,000

The agreement also makes changes regarding the Preauthorized Matching Funds and Issue Funds. The agreement allows the Alliance of Western Energy Consumers (AWEC)<sup>1</sup> to request payment of Preauthorized Matching Grants semi-annually, rather than annually, and lowers the matching amount of internal resources or outside funding from 50 percent to 35 percent. With regard to Issue Funds, the agreement amends the definition of "eligible proceedings." To help ease administrative efficiency, the agreement restricts eligible proceedings to significant proceedings, including general rate cases, mergers and acquisitions, integrated resource plans, annual power cost updates, and others so designated by the Commission.

In 2012, the Commission issued Order Nos. 12-110 and 12-122 in docket UM 1586 approving the Multi-State Process Intervenor Funding Agreement (MSP Funding Agreement) between PacifiCorp, CUB, and ICNU. This agreement provides funding for CUB's and ICNU's participation in ongoing efforts to address how system costs are apportioned among PacifiCorp's six-state territory. On February 7, 2017, the Commission issued Order No. 17-028 in docket UM 1586 approving the amended and restated MSP Funding Agreement that extended the intervenor funding until December 31, 2018. On January 16, 2019, the Commission issued Order No. 19-013 in docket UM 1586, approving the Third Amended

UM 1102(18)—PacifiCorp Application Reauthorization Deferred Accounting

<sup>&</sup>lt;sup>1</sup> AWEC is the successor entity to ICNU and the Northwest Industrial Gas Users.

and Restated Intervenor Funding Agreement. On June 16, 2020, the Commission issued Order No. 20-189 in docket UM 1586, approving the Multi-State Process Fourth Amended and Restated Intervenor Funding Agreement. The MSP funding agreement provides the amount of funding to be provided (the amounts are reflected in the table below) and procedures for budgets, approvals and payment of intervener funding grants that that can be made.

CUB	\$45,000
AWEC	\$45,000

#### Ε. Request for Reauthorization of Deferred Accounting

Under the instant docket, the Commission issued a series of orders authorizing PacifiCorp's deferral of Intervenor Funding Agreement costs. The Commission originally authorized deferral of the Intervenor Funding Agreement costs beginning September 17, 2003, in Order No. 03-560. The Commission has reauthorized this deferral annually, most recently in Order No. 20-290, which reauthorized the deferral through July 31, 2021. PacifiCorp seeks reauthorization of this deferral for a 12-month period beginning August 1, 2021.

#### F. **Amounts Subject to Deferral**

PacifiCorp anticipates that the maximum amounts to be deferred during the 12-month period beginning August 1, 2021, will be as shown below.

<sup>2</sup> See Order No. 05-862 (entered July 18, 2005), Order No. 06-251 (entered May 25, 2006), Order No. 07-268 (entered June 11, 2007), Order No. 08-324 (entered June 13, 2008), Order No. 09-304 (entered August 3, 2009), in Order No. 10-323 (entered August 17, 2010), Order No. 11-388 (entered September 30, 2011), Order No. 12-364 (entered September 25, 2012), Order No. 13-294 (entered August 20, 2013), Order No. 14-299 (entered

September 2, 2014), Order No. 15-268 (entered September 8, 2015), Order No. 17-022 (entered January 24, 2017),

Order No. 18-315 (entered August 28, 2018) and Order No. 20-290 (entered August 28, 2020).

Intervenor Funding Agreement	
CUB Fund	\$101,125
Preauthorized Matching Fund	\$ 72,738
Issue Fund	<u>\$143,750</u>
Total	\$317,613
MSP Funding Agreement	
CUB	\$ 45,000
AWEC	\$ 45,000
Total	\$ 90,000

#### G. Accounting

PacifiCorp proposes to record payment of Intervenor Funding Grants in Account 182.3 – Other Regulatory Assets. In the absence of approval of deferred accounting, PacifiCorp would expense the amounts through FERC account 928 – Regulatory Commission Expenses.

#### H. Description and Explanation of Entries in the Deferred Account to Date

Attachment B provides the most recent entries in the deferred account to date of the Application. These entries are for amounts paid to intervenors as ordered by the Commission per the Intervenor Funding Agreement adopted by Order No. 18-017 and the MSP Funding Agreement adopted by Order No. 20-189.

### I. Reasons for Continuation of Deferred Accounting

PacifiCorp requests the continuation of deferred accounting in order to seek future recovery of amounts previously approved in this docket.

#### J. Use of Sub-accounts

Ordering paragraph 2 of Order No. 10-323, docket UM 1102, requires PacifiCorp to separately account for each type of grant. Section 4.2 of the MSP Funding Agreement also requires PacifiCorp to separately account for each type of MSP Funding grant. PacifiCorp tracks intervenor funding grants by grant type through different internal order numbers.

Issue fund grant amounts paid to AWEC are tracked through internal order number 313374. Issue fund grant amounts paid to CUB are tracked through internal order number 313431. Matching fund grant amounts paid to AWEC are tracked through internal order number 313430. Matching fund grant amounts paid to CUB are tracked through internal order number 313429. MSP fund grant amounts paid to CUB and AWEC are tracked through internal order numbers 339031 and 339032, respectively.

#### K. Notice

A copy of the Notice of the Application of PacifiCorp for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants is included with this Application as Attachment A. This notice will be served to the service list from the company's most recent general rate case.

WHEREFORE, PacifiCorp respectfully requests that in accordance with ORS 757.259(3), the Commission reauthorize PacifiCorp to record and defer, on an ongoing basis and commencing as of August 1, 2020, Intervenor Funding Grants incurred by the company per the Intervenor Funding Agreement and the MSP Funding Agreement, as described in this Application.

DATED: July 28, 2021.

Respectfully submitted,

Matthew McVee

Chief Regulatory Counsel

### ATTACHMENT A

**NOTICE** 

## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

**UM 1102(18)** 

In the Matter

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants.

Notice of Application for Reauthorization to Defer Intervenor Funding Costs

On July 28, 2021, PacifiCorp d/b/a Pacific Power filed an Application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferral of intervenor funding costs. Approval of PacifiCorp's Application will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding. Persons who wish to obtain a copy of PacifiCorp's filing should contact the following:

PacifiCorp Oregon Dockets PacifiCorp 825 NE Multnomah, Suite 2000 Portland, OR 97232 Telephone: (503) 813-6583

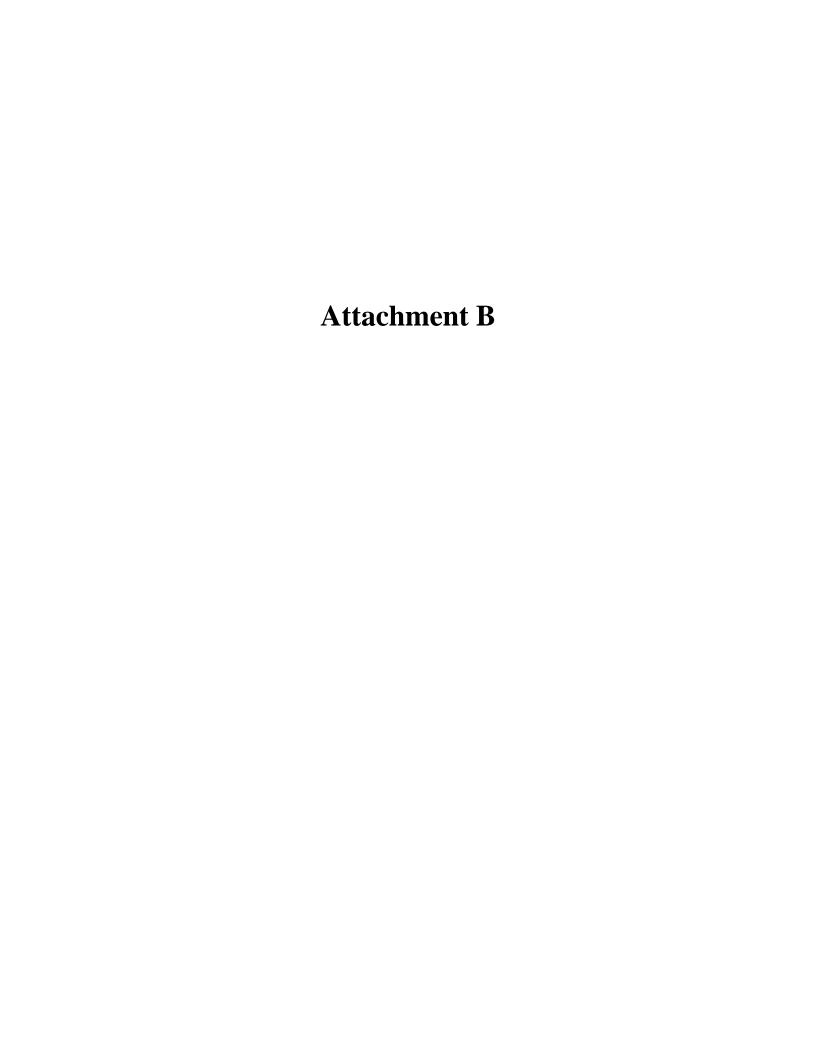
Email: oregondockets@pacificorp.com

Any person who wishes to submit written comments to the Commission must do so within 25 days of the date of PacifiCorp's application.

DATED: July 28, 2021.

Matthew McVee

Chief Regulatory Counsel



#### Oregon Deferred Intervenor Funding Grants Summary Account #187952 Activity through June 2020

New Funding Grants Paid	Postg Date Am	nount	Commission Order	Description
CUB Issue Fund Grant	11/30/15	11,093.00	UM 1713, Order No. 15-378	Large Customer Energy Efficiency CUB
CUB MSP Fund	11/30/15	8,884.00	UM 1586 (8), Order No. 15-374	Multi-State Process (MSP) CUB
CUB Issue Fund Grant	11/30/15	18,440.00	LC 62, Order No. 15-373	2015 Integrated Resource Plan (IRP) CUB
CUB Issue Fund Grant	11/30/15	8,238.50	UM 1662, Order 15-376	Generic Power Cost Mechanism CUB
ICNU Issue Fund	12/11/15	9,491.02	UM 1662, Order No. 15-312	Generic Power Cost Mechanism ICNU
CUB Grant Fund	1/11/16	66,125.00	UM 1357(59)	2016 Funding Grants CUB Fund
ICNU Issue Fund	3/8/16	7,551.75	UM 1662, Order No. 16-058	Generic Power Cost Mechanism ICNU
ICNU Matching Fund	3/8/16	43,322.02	UM 1357 (60) Order No. 16-083	2016 preauthorized matching fund ICNU
CUB MSP Fund	4/11/16	4,760.00	UM 1586(9), Order No. 16-126	Multi-State Process (MSP) CUB
SBUA Issue Fund	6/8/16	2,236.00	UM 1754, Order No. 16-204	2017-2021 RPIP SBUA
ICNU Issue Fund	6/8/16		UM 1719, Order No. 16-199	Renewable Generator's Contr to Capacity ICNU
		181,593.49	October 2015-June 2016	
			_	
ICNU MSP Fund	7/11/16	,	Order 16-252	MSP Fund Grant Request ICNU
CUB Issues Fund	8/10/16	•	Order 16-281	Issue Fund Grant Request (UM 1719 Renewable Generator's Contribution to Capacity) CUB
ICNU Issue Fund	9/9/16	4,634.67	Order 16-310	Issue Fund Grant Request (UM 1754 PAC 2017-21 RPIP) ICNU
CUB MSP Fund	9/23/16	12,901.00	Order 16-357	MSP Fund Grant Request CUB
CUB Issues Fund	10/27/16	33,200.00	Order 16-406	Issue Fund Grant Request (UE 307 PAC 2017 TAM) CUB
ICNU Issue Fund	11/23/16	5,000.00	Order 16-443	Issue Fund Grant Request (UM 1790 PAC 2017-21 RPIP #2) ICNU
SBUA Issue Fund	1/10/17	1,097.00	Order 17-001	Issue Fund Grant Request (UM 1751 Implementing Energy Storage Guidelines) SBUA
CUB Grant Fund	1/10/17	66,125.00	Order 17-003	CUB Fund Grant Request (UM 1357(65))
ICNU MSP Fund	1/23/17	4,080.00	Order 17-015	MSP Fund Grant Request ICNU
ICNU Issues Fund	2/7/17	24,893.33	Order 16-430	Issue Fund Grant (UE 307 PAC 2017 TAM) ICNU
SBUA Funding Grant	3/8/17	1,765.00	UM-1790, Order 17-013	Issue Fund Grant Request (UM 1790 PAC 2017-21 RPIP #2) SBUA
ICNU Preauth. Match	3/30/17	24,669.65	Order 17-094	ICNU Matching Funds Grant
ICNU Issues Fund	4/24/17	8,768.00	Order 17-143	Issue Fund Grant Request (UE 307 TAM ) ICNU
CUB Issue Fund	6/19/17	11,745.00	Order 17-183	Issue Fund Grant Request (UE 307 TAM post-order workshops) CUB
		242,764.65	July 2016-June 2017	

#### Oregon Deferred Intervenor Funding Grants Summary Account #187952 Activity through June 2020

New Funding Grants Paid	Postg Date	Amount	Commission Order	Description
CUB Issues Fund	8/30/2017	14,000.00	Order No. 17-278	Issue Fund Grant Request (AR 603 Community Solar) CUB
ICNU MSP Fund	9/30/2017	36,547.38	Order No. 17-333	MSP Fund Grant Request ICNU
CUB Issues Fund	9/30/2017	13,000.00	Order No. 17-334	Issue Fund Grant Request (UE 323 PAC 2018 TAM) CUB
ICNU Issue Fund	11/30/2017	12,646.26	Order No. 17-448	Issue Fund Grant Request (UE 323 2018 TAM) ICNU
ICNU Issue Fund	11/30/2017	14,313.74	Order No. 17-433	Issue Fund Grant Request (UM 1810 EV Programs) ICNU
ICNU Issue Fund	11/30/2017	20,000.00	Order No. 17-437	Issue Fund Grant Request (UM 1824 PAC State Specific Allocation) ICNU
CUB Issues Fund	11/30/2017	17,982.96	Order No. 17-442	Issue Fund Grant Request (LC 67 2017 IRP) CUB
CUB Issues Fund	11/30/2017	5,548.47	Order No. 17-430	Issue Fund Grant Request (UM 1716 RVOS) CUB
CUB Issues Fund	11/30/2017	2,635.94	Order No. 17-422	Issue Fund Grant Request (UM 1824 PAC State Specific Allocation) CUB
CUB MSP Fund	11/30/2017	22,407.66	Order No. 17-421	MSP Fund Grant Request CUB
ICNU Issue Fund	12/31/2017	,	Order No. 17-448 and 17-486	Issue Fund Grant Request (UE 323 2018 TAM) ICNU
CUB Issues Fund	12/31/2017	10,155.00	Order No. 17-475	Issue Fund Grant Request (UM 1810 EV Programs) CUB
CUB Issues Fund	12/31/2017	4,517.04	Order No. 17-498	Issue Fund Grant Request (LC 67 2017 IRP) CUB
CUB MSP Fund	12/31/2017	2,592.34	Order No. 17-498	MSP Fund Grant Request CUB
ICNU MSP Fund	1/31/2018	25,165.03	Order No. 18-009	MSP Fund Grant Request ICNU
CUB Grant Fund	1/31/2018	101,125.00	Order No. 18-020	CUB Fund Grant Request (UM 1929(1))
CUB Issues Fund	3/31/2018	1,145.00	Order No. 18-083	Issue Fund Grant Request (UM 1810 EV Programs) CUB
ICNU Matching Fund	4/30/2018	22,774.66	Order No. 18-107	ICNU Matching Funds Grant
CUB Issues Fund	4/30/2018		Order No. 18-102	Issue Fund Grant Request (UM 1824 PAC State Specific Allocation) CUB
		348,166.48	July 2017-June 2018	
			_	
CUD T E I	0/40/2040	2 000 00	0 1 11 10 207	7 5 10 15 1 ((1)4000)
CUB Issues Fund	8/18/2019		Order No. 18-287	Issue Fund Grant Request (UM1909)
ICNU Issue Fund	10/18/2019			Issue Fund Grant Request (UM 1824 and UE339)
CUB Issues Fund	10/18/2019	,	Order No. 18-363	Issue Fund Grant Request (UE339)
ICNU Issue Fund	11/18/2019	,	Order No. 18-409	Issue Fund Grant Request (UM1845)
ICNU Matching Fund	11/18/2019	•	Order No. 18-408	Issue Fund Grant Request (UM1929)
CUB Issues Fund	11/18/2019		Order No. 18-406	Issue Fund Grant Request (UM 1716)
ICNU MSP Fund	11/18/2019	•	Order No. 18-428	MSP Fund Grant Request ICNU (UM1586(14))
CUB Issues Fund	12/18/2019	•	Order No. 18-463	Issue Fund Grant Request (LC70)
CUB MSP Fund	2/19/2019		Order No. 19-009	MSP Fund Grant Request CUB (UM1586(15))
CUB Grant Fund	3/19/2019		Order No. 19-004	CUB Fund Grant Request (UM 1929)
ICNU Matching Fund	4/19/2019	•	Order No. 19-126	ICNU Matching Funds Grant (UM 1929)
ICNU Issue Fund	6/19/2019		Order No. 18-475	Issue Fund Grant Request (UM1965)
		364,/2/.13	_July 2018-June 2019 =	
ICNU Issue Fund	11/19/2019	35 110 02	Order No. 19-319	Issue Fund Grant Request (UE352)
ICNU Matching Fund	11/19/2019	•	Order No. 19-319	Issue Fund Grant Request (UL 1929)
ICNU Issue Fund	12/19/2019	,	Order No. 19-318  Order No. 19-402/Order No. 19-381	Issue Fund Grant Request (UM1968/UE356)
ICNU Issue Fund	12/19/2019	•	Order No. 19-402/Order No. 19-381	Issue Fund Grant Request (LC70)
CUB Issues Fund	12/19/2019	•	Order No. 19-417 Order No. 19-288	Issue Fund Grant Request (LC70) Issue Fund Grant Request (UE356)
CUB Issues Fund	12/19/2019	•	Order No. 19-290	Issue Fund Grant Request (UE352)
CUB MSP Fund	12/19/2019	,	Order No. 19-220/19-380	MSP Fund Grant Request CUB (UM1586(XX))
כטט ויוסר דעווע	12/13/2019	37,300.00	Oluci 110. 13-220/13-300	MOE I min grant vednest COB (ONITOO(VV))

#### Oregon Deferred Intervenor Funding Grants Summary Account #187952 Activity through June 2020

N 5 1 0 1 5 1				
New Funding Grants Paid		Amount	Commission Order	Description
ICNU MSP Fund	12/19/2019	52,500.00	Order No. 19-014/19-345/19-383	MSP Fund Grant Request ICNU (UM1586(XX))
CUB Issues Fund	1/20/2020	24,568.00	Order No. 20-006	Issue Fund Grant Request (LC70)
CUB Issues Fund	3/20/2020	101,125.00	Order No. 20-003	CUB Fund Grant Request (UM 1929)
ICNU Issue Fund	4/20/2020	8,726.54	Order No. 20-115	Issue Fund Grant Request (LC70)
ICNU Matching Fund	4/20/2020	52,613.94	Order No. 20-116	ICNU Matching Funds Grant (UM 1929)
	_	429,212.11	July 2019-June 2020	
	=		=, '	
AWEC Issue Fund	8/9/20	13,500.00	Order No. 20-235	Issue Fund Grant Request (UE375)
AWEC Issue Fund	8/9/20	40,000.00	Order No. 20-236	Issue Fund Grant Request (UE374)
CUB MSP Fund	9/8/20	7,400.00	Order No. 20-267	Issue Fund Grant Request (UE 375)
CUB MSP Fund	9/8/20	45,000.00	Order No. 20-237	Issue Fund Grant Request (UM 1586)
AWEC Preathorzied Fund	10/20/20	99,473.94	Order No. 20-339	Matching Fund Grant Request (UM1929)
AWEC Issue Fund	11/30/20	20,000.00	Order No. 20-418	Issue Fund Grant Request (UM2024)
CUB MSP Fund	11/30/20	9,272.00	Order No. 20-436	Issue Fund Grant Request (UM 1968)
CUB MSP Fund	11/30/20	54,000.00	Order No. 20-420	Issue Fund Grant Request (UE 374)
CUB MSP Fund	11/30/20	17,685.00	Order No. 20-419	Issue Fund Grant Request (LC 70)
AWEC MSP Fund	11/30/20	7,261.44	Order No. 20-426	Issue Fund Grant Request (UM 1586)
CUB MSP Fund	12/22/20	3,481.00	Order No. 20-448	MSP Fund Grant Request CUB (UM2004)
CUB MSP Fund	12/22/20	7,962.00	Order No. 20-452	MSP Fund Grant Request CUB (UM2024)
CUB Funding Grant	3/8/21	101,125.00	Order No. 21-025	CUB Fund Grant Request (UM 1929)
AWEC Preathorzied Match	5/9/21	6,728.66	Order No. 21-110	Issue Fund Grant Request (UM1929)
	_	432,889.04	July 2020-June 2021	

#### **CERTIFICATE OF SERVICE**

I certify that I delivered a true and correct copy of PacifiCorp's **Application for Reauthorization of Deferred Accounting Regarding Intervenor Funding Grants** on the parties listed below via electronic mail and/or or overnight delivery in compliance with OAR 860-001-0180.

#### Service List UE 374

BILL EHRLICH (C) (HC) TESLA	STEVE ELZINGA (C) CHARGEPOINT INC
3500 DEER CREEK RD	693 CHEMEKETA ST NE
PALO ALTO CA 94304	SALEM OR 97301
wehrlich@tesla.com	steve@shermlaw.com
<u>weimmen(a) testa teom</u>	seve(a)sierimaw.com
FRANCESCA WAHL (C) (HC)	LLOYD REED (C) (HC)
TESLA	REED CONSULTING
6800 DUMBARTON CIRCLE	10025 HEATHERWOOD LANE
FREMONT CA 94555	HIGHLANDS RANCH CO 80126
fwahl@tesla.com	lloyd.reed@lloydreedconsulting.com
CRYTAL RIVERA (C) (HC)	
SOMACH SIMMONS & DUNN	
500 CAPITOL MALL STE 1000	
SACRAMENTO CA 95814	
crivera@somachlaw.com	
AWEC	
TYLER C PEPPLE (C) (HC)	BRENT COLEMAN (C) (HC)
DAVISON VAN CLEVE, PC	DAVISON VAN CLEVE, PC
1750 SW HARBOR WAY STE 450	1750 SW HARBOR WAY STE 450
PORTLAND OR 97201	PORTLAND OR 97201
tcp@dvclaw.com	blc@dvclaw.com
CAL NAME COLLEGE	
CALPINE SOLUTIONS	CPTC P. CC
GREGORY M. ADAMS (C)	GREG BASS
RICHARDSON ADAMS, PLLC	CALPINE ENERGY SOLUTIONS, LLC
PO BOX 7218	401 WEST A ST, STE 500
BOISE ID 83702	SAN DIEGO CA 92101
greg@richardsonadams.com	greg.bass@calpinesolutions.com
KEVIN HIGGINS (C)	
ENERGY STRATEGIES LLC	
215 STATE ST - STE 200	
SALT LAKE CITY UT 84111-2322	
khiggins@energystrat.com	

CHARGEPOINT	
ALEXANDRA LEUMER (C) CHARGEPOINT alexandra.leumer@chargepoint.com	SCOTT DUNBAR (C) KEYES FOX & WIEDMAN LLP 1580 LINCOLN ST, STE 880 DENVER CO 80203 sdunbar@kfwlaw.com
OREGON CITIZENS UTILITY BOARD	<u> </u>
OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 dockets@oregoncub.org	MICHAEL GOETZ (C) (HC) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 mike@oregoncub.org
ROBERT JENKS (C) (HC) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 bob@oregoncub.org	
FRED MEYER	
JUSTIN BIEBER (C) FRED MEYER/ENERGY STRATEGIES LLC 215 SOUTH STATE STREET, STE 200 SALT LAKE CITY UT 84111 jbieber@energystrat.com	KURT J BOEHM (C) BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com
JODY KYLER COHN (C) BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI OH 45202 jkylercohn@bkllawfirm.com	
KWUA	
PAUL S SIMMONS (C) (HC) SOMACH SIMMONS & DUNN, PC 500 CAPITOL MALL, STE 1000 SACRAMENTO CA 95814 psimmons@somachlaw.com	
PACIFICORP	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	MATTHEW MCVEE (C) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 matthew.mcvee@pacificorp.com

ETTA LOCKEY (C)	
PACIFIC POWER	
825 NE MULTNOMAH ST., STE 2000	
PORTLAND OR 97232	
etta.lockey@pacificorp.com	
SBUA	·
WILLIAM STEELE (C)	DIANE HENKELS (C)
BILL STEELE AND ASSOCIATES, LLC	SMALL BUSINESS UTILITY ADVOCATES
PO BOX 631151	621 SW MORRISON ST. STE 1025
HIGHLANDS RANCH CO 80164	PORTLAND OR 97205
wa.steele@hotmail.com	diane@utilityadvocates.org
SIERRA CLUB	
ANA BOYD (C) (HC)	GLORIA D SMITH (C) (HC)
SIERRA CLUB	SIERRA CLUB LAW PROGRAM
2101 WEBSTER ST STE 1300	2101 WEBSTER ST STE 1300
OAKLAND CA 94612	OAKLAND CA 94612
ana.boyd@sierraclub.org	gloria.smith@sierraclub.org
CHRISTOPHER M BZDOK (C) (HC)	
OLSON BZDOK & HOWARD	
420 EAST FRONT ST	
TRAVERSE CITY MI 49686	
chris@envlaw.com	
STAFF	-
MARIANNE GARDNER (C)	SOMMER MOSER (C)
PUBLIC UTILITY COMMISSION OF	PUC STAFF - DEPARTMENT OF JUSTICE
OREGON	1162 COURT ST NE
PO BOX 1088	SALEM, OR 97301
SALEM, OR 97308-1088	sommer.moser@doj.state.or.us
marianne.gardner@puc.oregon.gov	sommer.moser@doj.state.or.us
mariame.garuner@puc.oregon.gov	
TESLA INC	
KEVIN AUERBACHER (C) (HC)	JOHN DUNBAR (C) (HC)
TESLA, INC.	DUNBAR LAW LLC
601 13TH ST NW, 9TH FL NORTH	621 SW MORRISION STREET STE 1025
WASHINGTON DC 20005	PORTLAND OR 97205
kauerbacher@tesla.com	jdunbar@dunbarlawllc.com
VITESSE LLC	
R BRYCE DALLEY (C)	LIZ FERRELL (C)
FACEBOOK INC	FACEBOOK, INC.
2400 S BERTSINGER RD	1 HACKER WAY
RIDGEFIELD WA 98642	MENLO PARK CA 94205
rbd@fb.com	eferrell@fb.com

IRION A SANGER (C)	
SANGER LAW PC	
1041 SE 58TH PLACE	
PORTLAND OR 97215	
<u>irion@sanger-law.com</u>	
WALMART	
WALMART VICKI M BALDWIN (C)	STEVE W CHRISS (C)
	STEVE W CHRISS (C) WAL-MART STORES, INC.
VICKI M BALDWIN (C)	` '
VICKI M BALDWIN (C) PARSONS BEHLE & LATIMER	WAL-MART STORES, INC.

Dated this 28<sup>th</sup> day of July, 2021.

Mary Penfield Adviser, Regulatory Operations