

LISA D. NORDSTROM Lead Counsel Inordstrom@idahopower.com

May 25, 2021

Public Utility Commission of Oregon Filing Center 201 High Street SE, Suite 100 P.O. Box 1088 Salem, Oregon 97301

Re: Docket No. UM 1853(4)

In the Matter of Idaho Power Company's Application for Deferred Accounting of

Certain Costs Associated with the North Valmy Power Plant

## Attention Filing Center:

Attached for filing is an electronic copy of Idaho Power Company's Application for Deferred Accounting of Certain Costs Associated with the North Valmy Power Plant.

As required by OAR 860-027-0300, the Application has been served on the parties to the UE 233 service list, and the parties to the UE 363 service list, as indicated in the Certificate of Service.

Please contact me at (208) 388-5825 or Regulatory Consultant Courtney Waites at (208) 388-5612 with any questions regarding this filing.

Very truly yours,

Lisa D. Nordstrom

Lin D. Madotrom

LDN/sh Enclosures

cc: Adam Lowney

# BEFORE THE PUBLIC UTILITY COMMISSION

| 1  |  |   |  |
|----|--|---|--|
| 2  |  | OF OREGON   |  |
| 3  |  | UM 1853   | (4)  |
| 4  |  |   |  |
| 5  |  | r of Idaho Power Company's for Deferred Accounting of Certain | APPLICATION                                    |
| 6  | Costs Associated with the North Valmy Power Plant  |   |  |
| 7  |  |   |  |
| 8  | I. INTRODUCTION  |   |  |
| 9  | Pursuant to ORS 757.210, ORS 757.259, and OAR 860-027-0300, Idaho Powe                         |   |  |
| 10 | Company ("Idaho Power" or "Company") hereby requests an accounting order reauthorizing         |   |  |
| 11 | Idaho Powe   | r to defer decommissioning reven                              | ues collected and decommissioning costs        |
| 12 | incurred pursuant to Order No. 17-235. The stipulation approved by Order No. 17-235            |   |  |
|    | includes the collection of the North Valmy Power Plant ("Valmy") amounts and is ar             |   |  |
| 13 | "automatic adjustment clause" ("AAC") as defined in ORS 757.210. Idaho Power seeks             |   |  |
| 14 | reauthorization for this deferral effective as of June 1, 2021. In support of this Application |   |  |
| 15 | Idaho Power  | states:   |  |
| 16 | 1.   | Idaho Power is a public utility in the                        | e state of Oregon and its rates, services, and |
| 17 |  | accounting practices are subject                              | et to the regulation of the Public Utility     |
| 18 |  | Commission of Oregon ("Commiss                                | sion").  |
| 19 | 2.   | This Application is filed pursua                              | ant to ORS 757.259, which allows the           |
| 20 |  |   | authorize the deferral of certain items for    |
| 21 |  | later inclusion in rates.                                     |  |
| 22 | 3.   | Communications regarding this Ap                              | unlication should be addressed to:             |
| 23 | J.   |   |  |
| 24 |  | Lisa Nordstrom<br>Idaho Power Company                         | Courtney Waites Idaho Power Company            |
| 25 |  | P.O. Box 70<br>Boise, ID 83707                                | P.O. Box 70<br>Boise, ID 83707                 |
| 26 |  | Inordstrom@idahopower.com dockets@idahopower.com              | cwaites@idahopower.com                         |
|    |  |   |  |

Page 1 - APPLICATION

Idaho Power Company 1221 West Idaho Street Boise, ID 83702

#### II. OAR 860-027-0300(3) REQUIREMENTS

### A. <u>Description</u>

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With this deferral application, Idaho Power seeks reauthorization from the Commission to defer, for future true-up, decommissioning revenues collected and decommissioning costs incurred in accordance with Order No. 17-235.

#### B. Reasons for Deferral

7 On November 2, 2016, Idaho Power filed an application with the Commission 8 requesting approval to update costs associated with Valmy Units 1 and 2 to reflect an endof-life for those units of 2025, and further requested authority to recover all Valmy-related costs by 2025 to align the expected remaining operating life of the plant with cost recovery, 10 11 resulting in cost recovery from customers who are served by the plant (Docket No. UE 316). In June 2017, the Commission issued Order No. 17-235, approving the recovery of the 12 following expenses and investment associated with Valmy through an AAC: (1) the 13 accelerated depreciation associated with the existing Valmy plant investments through May 31, 2017, (2) the return on undepreciated existing capital investments at Valmy until its end-15 16 of-life based upon the then currently authorized rate of return, and (3) estimated future 17 decommissioning expenses.

In UE 345/Advice No. 18-02, the Commission issued Order No. 18-199, approving the accelerated depreciation associated with Idaho Power's exit from operations of Valmy Unit 1 by December 31, 2019. Due to cessation of Valmy Unit 1, Order No. 19-341 authorized the removal from customer rates of the accelerated depreciation associated with those investments effective January 1, 2020. Filed pursuant to Order No. 17-235 and ORS 757.259(2)(e), the AAC requires Idaho Power to file a deferral request. This deferral is intended to provide for the deferral and tracking of decommissioning revenues collected and decommissioning costs incurred until decommissioning activities are concluded. In addition,

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1 this deferral will allow Idaho Power to appropriately match the costs borne by and benefits

## 2 received by customers.

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### C. Proposed Accounting

Idaho Power records revenues and expenses that would be subject to the deferral order in accordance with the Code of Federal Regulations to the Federal Energy Regulatory Commission ("FERC") Accounts 440-444 (Operating Revenues), FERC Account 557 (Other Expenses), and FERC Accounts 500-598 (Operations and Maintenance Accounts). Upon receiving approval of a deferral, Idaho Power proposes to record the deferred amounts to FERC Account 182 (Regulatory Assets) until decommissioning activities are concluded. After decommissioning activities are concluded, amounts in the deferral account, either positive or negative, will be recovered or refunded in customer rates through a surcharge or credit, as appropriate.

## D. <u>Estimate of Amounts</u>

14 Order No. 17-235 approved an Oregon jurisdictional revenue requirement increase of \$1.06 million associated with the recovery of the annual incremental return on and 16 accelerated depreciation of existing Valmy investments, and decommissioning costs related to the Valmy shutdown. In addition, Order No. 18-199 approved an Oregon jurisdictional 17 18 revenue requirement increase of \$2.50 million associated with the recovery of the 19 accelerated depreciation of existing Valmy Unit 1 investments by year end 2019. The Oregon 20 jurisdictional revenue requirement decreased \$3.17 million with Order No. 19-341 as a result of cessation of Valmy Unit 1 and full collection of the associated investments. Idaho Power 21 22 estimates the deferral account will contain the Oregon jurisdictional share of 23 decommissioning costs, approximately \$1,870,000, at December 31, 2025. deferred amounts associated with decommissioning costs are dependent on factors that 24 cannot be precisely forecasted, Idaho Power cannot provide a precise estimate of the total 25 26 deferred amount.

| 1  | E. <u>Notice</u>  |  |  |
|----|---|--|--|
| 2  | A copy of the Notice of Application for Deferred Accounting of Certain Costs                |  |  |
| 3  | Associated with the North Valmy Power Plant and a list of persons served with the Notice    |  |  |
| 4  | are attached to the Application as Attachment A.  |  |  |
| 5  | III. OAR 860-027-0300(4) REQUIREMENTS   |  |  |
| 6  | A. <u>Entries in the Deferred Account to Date</u>   |  |  |
| 7  | Attached to the Application as Attachment B is a description and explanation of the         |  |  |
| 8  | entries specific to decommissioning expenses in this deferred account as of the date of the |  |  |
| 9  | Application.  |  |  |
| 10 | B. Reason for Continuation of Deferred Accounting   |  |  |
| 11 | As discussed in detail above, this deferral is intended to capture decommissioning          |  |  |
| 12 | revenues collected and decommissioning costs incurred in accordance with Order No. 17-      |  |  |
| 13 | 235.  |  |  |
| 14 | III. <u>CONCLUSION</u>  |  |  |
| 15 | Reauthorization of deferred accounting treatment is an appropriate, just, and               |  |  |
| 16 | reasonable means of implementing Order No. 17-235.  |  |  |
| 17 | For the reasons stated above, Idaho Power requests permission to defer                      |  |  |
| 18 | decommissioning revenues collected and decommissioning costs incurred beginning June        |  |  |
| 19 | 1, 2021, pursuant to Order No. 17-235.  |  |  |
| 20 | DATED: May 25, 2021   |  |  |
| 21 | IDAHO POWER COMPANY   |  |  |
| 22 | Lin D. Madotrom   |  |  |
| 23 | LISA D. NORDSTROM Attorney for Idaho Power Company  |  |  |
| 24 | Attorney for idano i ower company   |  |  |
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| 26 |   |  |  |

**Attachment A** 

# BEFORE THE PUBLIC UTILITY COMMISSION

| 1  | OF OREGON  |  |  |
|----|--|--|--|
| 2  | UM 1853 (4)  |  |  |
| 3  |  |  |  |
| 4  | In the Matter of Idaho Power Company's Application for Deferred Accounting of Certain  NOTICE OF APPLICATION FOR |  |  |
| 5  | Costs Associated with the North Valmy Power Plant  DEFERRED ACCOUNTING OF CERTAIN COSTS ASSOCIATED WITH          |  |  |
| 6  | THE NORTH VALMY POWER PLANT  |  |  |
| 7  | On May 25, 2021, Idaho Power Company ("Idaho Power") filed an application with                                   |  |  |
| 8  | the Public Utility Commission of Oregon ("Commission") for an order reauthorizing the                            |  |  |
| 9  | deferral of decommissioning revenues collected and decommissioning costs incurred                                |  |  |
| 0  | pursuant to Order No. 17-235.  |  |  |
| 1  | Approval of Idaho Power's Application will not authorize a change in Idaho Power's                               |  |  |
| 2  | rates, but will permit the Commission to consider allowing such deferred amounts in rates in                     |  |  |
| 3  | a subsequent proceeding.   |  |  |
| 4  | Idaho Power's Application will be posted on the Commission website for persons who                               |  |  |
| 5  | wish to obtain a copy or they may contact the following:   |  |  |
| 6  | Lisa D. Nordstrom<br>Idaho Power Company   |  |  |
| 7  | 1221 West Idaho Street   |  |  |
| 8  | P.O. Box 70<br>Boise, ID 83707   |  |  |
| 9  | Inordstrom@idahopower.com  |  |  |
| 20 | Any person who wishes to submit written comments to the Commission on Idaho                                      |  |  |
| 21 | Power's Application must do so by no later than June 23, 2021.   |  |  |
| 22 | DATED: May 25, 2021.   |  |  |
| 23 | Lin D. Madotrom  |  |  |
| 24 | Lisa D. Nordstrom  |  |  |
| 25 | Attorney for Idaho Power Company   |  |  |
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**Attachment B** 

| Account          | DATE DISTDESC  | Descr  | Sum TOTAMT           |
|------------------|--|--|----------------------|
| 182436           | 7/31/2017 RECORD COMBINED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 8/31/2017 RECORD COMBINED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 9/30/2017 RECORD COMBINED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 10/31/2017 RECORD COMBINED REVENUE                                       | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436<br>182436 | 11/30/2017 RECORD COMBINED REVENUE<br>12/31/2017 RECORD COMBINED REVENUE | VALMY OR DECOMM ENTRIES  VALMY OR DECOMM         | -6694.00<br>-6694.00 |
| 182436           | 1/31/2018 RECORD COMBINED REVENUE  | VALMY OR DECOMM                                  | -6694.00             |
| 182436           | 2/28/2018 RECORD COMBINED REVENUE  | VALMY OREGON DECOMM ENTRY                        | -6694.00             |
| 182436           | 3/31/2018 LEVELIZED REVENUE  | VALMY OREGON DECOMM                              | -6694.00             |
| 182436           | 4/30/2018 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 5/31/2018 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 6/30/2018 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 7/31/2018 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 8/31/2018 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 9/30/2018 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 10/31/2018 LEVELIZED REVENUE   | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 11/30/2018 LEVELIZED REVENUE   | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 12/31/2018 LEVELIZED REVENUE   | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 1/31/2019 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 2/28/2019 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 3/31/2019 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436<br>182436 | 4/30/2019 LEVELIZED REVENUE<br>5/31/2019 LEVELIZED REVENUE               | VALMY OR DECOMM ENTRIES  VALMY OR DECOMM ENTRIES | -6694.00             |
| 182436           | 6/30/2019 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES  VALMY OR DECOMM ENTRIES | -6694.00<br>-6694.00 |
| 182436           | 7/31/2019 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES  VALMY OR DECOMM ENTRIES | -6694.00             |
| 182436           | 8/31/2019 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 9/30/2019 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 10/31/2019 LEVELIZED REVENUE   | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 11/30/2019 LEVELIZED REVENUE   | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 12/31/2019 LEVELIZED REVENUE   | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 1/31/2020 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 2/29/2020 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 3/31/2020 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 4/30/2020 LEVELIZED REVENUE  | VALMY OR DECOMM ENTRIES                          | -6694.00             |
| 182436           | 5/31/2020 LEVELIZED REVENUE  | VALMY OR DECOMM                                  | -97336.12            |
| 182436           | 5/31/2020 LEVELIZATION INTEREST  | VALMY OR DECOMM                                  | 3463.01              |
| 182436           | 5/31/2020 REVENUE REQUIREMENT  | VALMY OR DECOMM                                  | 86324.92             |
| 182436           | 6/30/2020 LEVELIZED REVENUE  | VALMY DECOMM                                     | -97336.12            |
| 182436           | 6/30/2020 LEVELIZATION INTEREST  | VALMY DECOMM                                     | 3421.15              |
| 182436           | 6/30/2020 REVENUE REQUIREMENT  | VALMY DECOMM                                     | 86324.92             |
| 182436<br>182436 | 7/31/2020 LEVELIZED REVENUE<br>7/31/2020 LEVELIZATION INTEREST           | VALMY ID-OR DECOMM  VALMY ID-OR DECOMM           | -97336.12<br>3379.05 |
| 182436           | 7/31/2020 REVENUE REQUIREMENT  | VALMY ID-OR DECOMM                               | 86324.92             |
| 182436           | 8/31/2020 LEVELIZED REVENUE  | VALMY DECOMM ID-OR                               | -97336.12            |
| 182436           | 8/31/2020 LEVELIZATION INTEREST  | VALMY DECOMM ID-OR                               | 3336.72              |
| 182436           | 8/31/2020 REVENUE REQUIREMENT  | VALMY DECOMM ID-OR                               | 86324.92             |
| 182436           | 9/30/2020 LEVELIZED REVENUE  | Reversal-VALMY DECOMM ID-OR                      | 97336.12             |
| 182436           | 9/30/2020 REVENUE REQUIREMENT  | Reversal-VALMY DECOMM ID-OR                      | -86324.92            |
| 182436           | 9/30/2020 LEVELIZATION INTEREST  | Reversal-VALMY DECOMM ID-OR                      | -3336.72             |
| 182436           | 9/30/2020 LEVELIZED REVENUE  | CORRECT REV JRNL 34970                           | -97336.12            |
| 182436           | 9/30/2020 LEVELIZATION INTEREST  | CORRECT REV JRNL 34970                           | 3336.72              |
| 182436           | 9/30/2020 REVENUE REQUIREMENT  | CORRECT REV JRNL 34970                           | 86324.92             |
| 182436           | 9/30/2020 LEVELIZED REVENUE  | VALMY DECOMM ID-OR                               | -97336.12            |
| 182436           | 9/30/2020 LEVELIZATION INTEREST  | VALMY DECOMM ID-OR                               | 3294.15              |
| 182436           | 9/30/2020 REVENUE REQUIREMENT  | VALMY DECOMM ID-OR                               | 86324.92             |
| 182436           | 10/31/2020 LEVELIZED REVENUE   | VALMY DECOMM ID-OR                               | -97336.12            |
| 182436           | 10/31/2020 LEVELIZATION INTEREST   | VALMY DECOMM ID OR                               | 3251.35              |
| 182436<br>182436 | 10/31/2020 REVENUE REQUIREMENT<br>11/30/2020 LEVELIZED REVENUE           | VALMY DECOMM ID-OR VALMY DECOMM ID-OR            | -97336.12            |
| 182436           | 11/30/2020 LEVELIZED REVENUE  11/30/2020 LEVELIZATION INTEREST           | VALMY DECOMM ID-OR                               | 3208.31              |
| 182436           | 11/30/2020 REVENUE REQUIREMENT   | VALMY DECOMM ID-OR                               | 86324.92             |
| 182436           | 12/31/2020 LEVELIZED REVENUE   | VALMY DECOMM ID-OR                               | -97336.12            |
| 182436           | 12/31/2020 ROUNDING ADJ TO SCHED   | VALMY DECOMM ID-OR                               | 0.01                 |
| 182436           | 12/31/2020 LEVELIZATION INTEREST   | VALMY DECOMM ID-OR                               | 3165.03              |
| 182436           | 12/31/2020 REVENUE REQUIREMENT   | VALMY DECOMM ID-OR                               | 86324.92             |
| 182436           | 1/31/2021 LEVELIZED REVENUE  | VALMY DECOMM ID-OR                               | -97336.12            |
| 182436           | 1/31/2021 LEVELIZATION INTEREST  | VALMY DECOMM ID-OR                               | 3121.51              |
| 182436           | 1/31/2021 REVENUE REQUIREMENT  | VALMY DECOMM ID-OR                               | 81933.51             |
| 182436           | 2/28/2021 LEVELIZED REVENUE  | VALMY DECOMM ID-OR                               | -97336.12            |
| 182436           | 2/28/2021 LEVELIZATION INTEREST  | VALMY DECOMM ID-OR                               | 3053.40              |
| 182436           | 2/28/2021 REVENUE REQUIREMENT  | VALMY DECOMM ID-OR                               | 81933.51             |
| 182436           | 3/31/2021 LEVELIZED REVENUE  | VALMY DECOMM ID-OR                               | -97336.12            |
| 182436           | 3/31/2021 LEVELIZATION INTEREST  | VALMY DECOMM ID-OR                               | 2984.90              |
| 182436           | 3/31/2021 REVENUE REQUIREMENT  | VALMY DECOMM ID-OR                               | 81933.51             |
| 182436           | 4/30/2021 REVENUE REQUIREMENT  | VALMY DECOMM ID OR                               | 81933.51             |
| 182436<br>182436 | 4/30/2021 LEVELIZED REVENUE<br>4/30/2021 LEVELIZATION INTEREST           | VALMY DECOMM ID-OR VALMY DECOMM ID-OR            | -97336.12<br>2016.03 |
| 102430           | 7/JUIZUZ I LLVELIZATION INTEREST   | AUTINI DECOMMINITO-OK                            | 2916.03              |

| 1  | CERTIFICATE OF SERVICE  |  |  |
|----|---|--|--|
| 2  | UM 1853(4)  |  |  |
| 3  | I hereby certify that on May 25, 2021, I served a true and correct copy of Idaho        |  |  |
| 4  | Power Company's Notice of Application on the parties in Docket UE 382 by e-mail to said |  |  |
| 5  | person(s) as indicated below.   |  |  |
| 6  | OPUC Dockets<br>Citizens' Utility Board of Oregon                                       | Robert Jenks Citizens' Utility Board of Oregon bob@oregoncub.org         |  |
| 7  | dockets@oregoncub.org Lisa F. Rackner   | Stephanie S. Andrus  |  |
| 8  | McDowell Rackner & Gibson PC dockets@mrg-law.com  | Department of Justice Business Activities Section                        |  |
| 9  |   | Stephanie.andrus@state.or.us   |  |
| 10 | Mitch Moore<br>Public Utility Commission of Oregon                                      | Scott Gibbons Public Utility Commission of Oregon                        |  |
| 11 | Mitch.moore@state.or.us   | Scott.gibbons@state.or.us  |  |
| 12 | Erick Colville Public Utilities Commission of Oregon                                    | Gregory M. Adams<br>Richardson Adams, PLLC                               |  |
| 13 | Erik.colville@state.or.us   | greg@richardsonadams.com   |  |
| 14 | Peter J. Richardson<br>Richardson Adams, PLLC   | Joshua D. Johnson  |  |
| 15 | peter@richardsonadams.com   | Attorney at Law <a href="mailto:idi@racinelaw.net">idi@racinelaw.net</a> |  |
| 16 | Dr. Don Reading   | Anthony J. Yankel  |  |
| 17 | dreading@mindspring.com   | Utility Net, Inc.<br>tony@yankel.net                                     |  |
| 18 | Randy Dahlgren Portland General Electric Company  | Douglas C. Tingey Portland General Electric Company                      |  |
| 19 | Pge.opuc.filings@pgn.com  | Doug.tingey@pgn.com  |  |
| 20 | Irion A. Sanger<br>Davison Van Cleve, PC  | Wendy Gerlitz<br>NW Energy Coalition                                     |  |
| 21 | irion@sanger-law.com  | wendy@nwenergy.org   |  |
| 22 | Etta Lockey<br>Pacific Power  | Sarah Link<br>Pacific power  |  |
| 23 | Etta.lockey@pacificorp.com  | Sarah.link@pacificorp.com  |  |
| 24 | Oregon Dockets PacifiCorp, d/b/a Pacific Power  | Donald W. Schoenbeck   |  |
| 25 | oregondockets@pacificorp.com  | Regulatory & Cogeneration Services, Inc. dws@r-c-s-inc.com               |  |
| 26 |   |  |  |

| 1  | John W. Stephens<br>Esler Stephens & Buckley          | Renewable Northwest Project dockets@renewablenew.org       |
|----|---|--|
| 2  | stephens@eslerstephens.com<br>ortez@eslerstephens.com | <u></u>  |
| 3  | Somer Moser   | Ming Peng  |
| 4  | Department of Justice Somer.moser@doj.state.or.us     | Public Utility Commission of Oregon  Ming.peng@state.or.us |
| 5  |   | wing.peng@state.or.us                                      |
| 6  | DATED: May 25, 2021                                   | Lancha D-Lolines   |
| 7  |   | Lancha D-Lotines   |
| 8  |   | Sandra D. Holmes<br>Legal Administrative Assistant         |
| 9  |   | Logar Administrative Assistant                             |
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