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Portland, Oregon 97232

December 29, 2022

VIA ELECTRONIC FILING

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

Re: UE 407—PacifiCorp d/b/a Pacific Power Application for Approval of an Automatic Adjustment Clause for Recovery of Costs Associated with the Company's Wildfire Protection Plan

PacifiCorp d/b/a Pacific Power encloses for filing in this docket the Joint Stipulation and Joint Testimony in Support of the Stipulation.

If you have questions about this filing, please contact Cathie Allen at (503) 813-5934.

Sincerely,

Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 407

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of an Automatic
Adjustment Clause for Recovery of Costs
Associated with the Company's Wildfire
Protection Plan

STIPULATION

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This Stipulation resolves all issues in PacifiCorp d/b/a Pacific Power's

(PacifiCorp or Company) Application for approval of an automatic adjustment clause for

recovery of costs associated with the Company's Wildfire Protection Plan (WPP), filed in docket

UE 407 and now pending before the Public Utility Commission of Oregon (Commission). The

parties to the Stipulation are PacifiCorp, Commission Staff (Staff), and the Alliance of Western

Energy Consumers (AWEC), together referred to as the "Stipulating Parties." The Stipulating

Parties believe that the Stipulation represents a reasonable compromise of positions among the

parties and should be adopted by the Commission without modification. The Oregon Citizens'

Utility Board (CUB) is the only party who has intervened in docket UE 407 and is not a party to

the Stipulation. CUB has indicated that it will object to the Commission adopting the

Stipulation.

I. RECITALS

1. Oregon Revised Statute (ORS) 757.963(1) provides that "[a] public utility that

provides electricity must have and operate in compliance with a risk-based wildfire protection

plan that is filed with the Public Utility Commission and has been evaluated by the commission."

1 2. The Commission approved PacifiCorp’s 2022 WPP on April 28, 2022. The 2022
2 WPP describes PacifiCorp’s comprehensive plan for wildfire mitigation in compliance with the
3 requirements in Oregon Administrative Rule (OAR) 860-300-0002.¹

4 3. ORS 757.963(8) provides that “[a]ll reasonable operating costs incurred by, and
5 prudent investments made by, a public utility to develop, implement or operate a wildfire
6 protection plan are recoverable in the rates of [a] public utility....”

7 4. The Commission approved a PacifiCorp application for deferred accounting to
8 track the incremental operating costs and capital investments associated with the Company’s
9 WPP on July 13, 2022.² PacifiCorp indicated in this application that it would make a subsequent
10 filing in 2022 for approval of a rate schedule and automatic adjustment clause to begin recovery
11 of these costs.³

12 5. ORS 757.963(8) further provides that the Commission “shall establish an
13 automatic adjustment clause, as defined in ORS 757.210, or another method to allow timely
14 recovery of these costs.”

15 6. On July 12, 2022, PacifiCorp filed an Application initiating docket UE 407
16 requesting that the Commission: (1) approve a new rate tariff Schedule 190, balancing account,
17 and automatic adjustment clause for the incremental operating costs and capital investments
18 associated with the Company’s WPP; (2) find that the costs contained within the 2022 WPP are
19 reasonable and appropriate; and (3) find that the approximately \$19.9 million increase to

¹ *In the Matter of PacifiCorp d/b/a Pacific Power 2022 Wildfire Mitigation Plan*, Docket No. UM 2207, Order No. 22-131 (April 28, 2022). A copy of the 2022 WPP is provided in the Application filed to this docket on July 12, 2022.

² *In the Matter of PacifiCorp d/b/a Pacific Power, Application for Approval of Deferred Accounting for Operating Costs and Capital Investments Made to Implement and Operate the Company’s Oregon Wildfire Protection Plan*, Docket No. UM 2221, Order 22-258 (July 13, 2022) (order adopting Commission Staff’s recommendation).

³*Id.*, Application at 2 (Jan. 1, 2022).

1 PacifiCorp’s annual revenue requirement for the incremental costs associated with the 2022 WPP
2 is just and reasonable.

3 7. On July 21, 2022, the Commission issued an Order suspending the Application
4 filed in this docket on July 12, 2022, for a period not exceeding nine months.

5 8. On August 2, 2022, the Commission issued a procedural conference
6 memorandum and notice of prehearing conference.

7 9. On August 9, 2022, CUB filed a notice of intervention. On August 12, 2022,
8 AWEC filed a petition to intervene, which was granted by the Commission on August 18, 2022.

9 10. On August 18, 2022, the Commission issued a procedural conference
10 memorandum adopting a procedural schedule in this docket.

11 11. On September 27, 2022, in accordance with the procedural schedule adopted by
12 the Commission, PacifiCorp filed opening testimony and exhibits to this docket in support of the
13 Company’s request for the Commission’s approval of the Application.

14 12. On November 10, 2022, PacifiCorp, Staff, AWEC, and CUB convened a
15 settlement conference. As a result of this meeting and subsequent communications, the
16 Stipulating Parties reached a settlement agreement to resolve all issues in docket UE 407. CUB
17 did not join the settlement agreement reached by the Stipulating Parties. The terms of settlement
18 agreement reached by the Stipulating Parties are captured within this Stipulation.

19 **II. AGREEMENT**

20 13. Performance-Based Ratemaking: The Stipulating Parties agree that there will be
21 no performance-based rate mechanism or earnings test applied the recovery of costs (including
22 capital investments) associated with a WPP in this docket.

1 14. Treatment of Capital Investments: Prudent capital investments under the WPP
2 placed in service after the rate effective date of the most recent rate adjustment will be included
3 in rates through the WPP Adjustment consistent with the treatment of capital investments in
4 general rate cases (including authorized rate of return from the most recent general rate case).

5 15. Rate base treatment: Rates will be updated annually to capture the rate base value
6 of WPP investments as of the annual rate effective date of the mechanism. Additionally, the rate
7 base amounts included in the Adjustment mechanism will also be updated annually to reflect
8 depreciation. Wildfire-related capital investments will not be “absorbed” in the context of a
9 general rate case and cost recovery of such investments is to remain in the wildfire mechanism
10 separate from general revenue requirements.

11 16. Cost Recovery: Cost recovery of projected ongoing operation and maintenance
12 (O&M) for wildfire mitigation-related activities are to be included within the WPP Adjustment
13 mechanism. These expenditures are to reflect expenditures consistent with PacifiCorp’s most
14 recent WPP filing under ORS 757.963. However, expenditures associated with the WPP remain
15 subject to a prudence review.

- 16 a. As part of the annual filing, PacifiCorp will provide detailed information that
17 can be used to identify that the costs included in the mechanism are
18 incremental to costs included for recovery in a general rate case or Schedule
19 94, the vegetation management mechanism. Cost recovery of the amount of
20 O&M included in current base rates prior to Commission adoption of this
21 wildfire mechanism will be excluded from this mechanism. Non-WPP
22 vegetation management will not be recovered through this mechanism.

1 b. Any under or over expenditures of wildfire mitigation-related O&M on a
2 12-month basis will be carried forward in a subsequent 12-month period in a
3 balancing account to be recovered (if customers owe money) or refunded (if
4 the Company owes money) in rates for the subsequent 12-month period of the
5 wildfire mechanism's operation. The interest rate on the balancing account
6 will be the modified blended treasury plus 100 basis points.

7 17. Vegetation Management Metrics: Consistent with the First Partial Stipulation in
8 PacifiCorp's most recent general rate case (Docket No. UE 399), the vegetation management
9 performance-based mechanism will not differentiate between fire high consequence areas
10 (FHCA) and non-FHCA.⁴ (All violations will be treated equally/counted for any performance
11 based ratemaking treatment that the Commission adopts in the separate vegetation management
12 mechanism).

13 18. Timing: Rates for this WPP Adjustment mechanism will be effective
14 approximately 120 days after PacifiCorp submits its annual filing, including all relevant
15 supporting materials, currently anticipated to be on July 1 of each year.

16 19. Term: This automatic adjustment clause will continue until a replacement
17 mechanism is approved by the Commission under ORS 757.963(8). Parties may not propose
18 changes to this mechanism that would be effective prior to the annual filing that would occur on
19 July 1, 2025. Notwithstanding these provisions, this mechanism will be effective through July 1,
20 2025. No party is prohibited from proposing performance based ratemaking mechanisms related
21 to a wildfire mitigation mechanism with a rate effective date after July 1, 2025.⁵

⁴ *In the Matter of PacifiCorp, d/b/a Pacific Power, Request for a General Rate Revision*, Docket No. UE 399, First Partial Stipulation on Wildfire Mitigation and Vegetation Management Issues (Aug. 25, 2022).

⁵ This statement should not be construed as any Stipulating Party taking a position on whether performance based ratemaking mechanisms or any earnings test is permitted by the language of ORS 757.963.

1 20. Parties may propose adjustments in future cost recovery proceedings based on a
2 determination that costs are not incremental to the amounts included in base rates.

3 21. At a minimum PacifiCorp shall provide detailed supporting information in its
4 annual filing including, but not limited to, the following:

- 5 a. Detailed accounting comparing the amounts spent relative to its WPP budget;
- 6 b. Invoice level data detailing non-labor O&M using the same format as Staff
7 Standard Data Request 57;
- 8 c. A project-level itemized budget of WPP investments and costs in each annual
9 filing; and
- 10 d. A detailed reconciliation between the budget and actual expenditures, by
11 project, in each annual filing.

12 22. Other Adjustments: The Parties agree that this Stipulation represents a
13 compromise among competing interests and a resolution of all contested issues in this
14 proceeding. Any adjustment to PacifiCorp’s Application not incorporated into this Stipulation
15 directly or by reference would be resolved without an adjustment or recommendation for the
16 purposes of this proceeding.

17 23. The Stipulating Parties agree to submit this Stipulation to the Commission and
18 request that the Commission adopt the Stipulation as presented and without any modification.
19 The Stipulating Parties agree that this Stipulation will result in rates that meet the standard in
20 ORS 756.040.

21 24. The Stipulating Parties agree to make best efforts to provide each other any and
22 all news releases that any Party intends to make about the Stipulation two business days in
23 advance of publication. This provision is not binding on the Commission itself.

24 25. This Stipulation will be offered in the record as evidence under OAR 860-001-
25 0350(7). The Stipulating Parties agree to support this Stipulation throughout this proceeding and

1 any appeal, provide witnesses to sponsor the Stipulation at hearing, if required, and recommend
2 that the Commission issue an order adopting the Stipulation.

3 26. The Stipulating Parties have negotiated this Stipulation as an integrated
4 document. If the Commission rejects all or any material part of this Stipulation or adds any
5 material condition to any final order that is not consistent with this Stipulation, each Stipulating
6 Party reserves its right, pursuant to OAR 860-001-0350(9), to present evidence and argument on
7 the record in support of the Stipulation or to withdraw from the Stipulation. The Stipulating
8 Parties agree that in the event the Commission rejects all or any material part of this Stipulation
9 or adds any material condition to any final order that is not consistent with this Stipulation, the
10 Parties will meet in good faith within fifteen days and discuss next steps. A Stipulating Party
11 may withdraw from the Stipulation after this meeting by providing written notice to the
12 Commission and other Parties. Parties shall be entitled to seek rehearing or reconsideration
13 pursuant to OAR 860-001-0720 in any manner that is consistent with the agreement embodied in
14 this Stipulation. Nothing in this provision prevents a Stipulating Party from individually
15 appealing an order under ORS 757.610.

16 27. By entering into this Stipulation, no Stipulating Party approves, admits, or
17 consents to the facts, principles, methods, or theories employed by any other Stipulating Party.

18 28. This Stipulation is not enforceable by any Stipulating Party unless and until
19 adopted by the Commission in a final order. Each signatory to this Stipulation avers that they are
20 signing this Stipulation in good faith and that they intend to abide by the terms of this Stipulation
21 unless and until the Stipulation is rejected or adopted only in part by the Commission. The
22 Stipulating Parties agree that the Commission has exclusive jurisdiction to enforce or modify the
23 Stipulation. If the Commission rejects or modifies this Stipulation, the Stipulating Parties

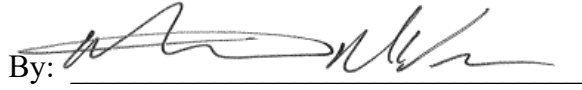
1 individually reserve the right to seek reconsideration or rehearing of the Commission order under
2 ORS 756.561 and OAR 860-001-0720 or to appeal the Commission order individually under
3 ORS 756.610.

4 29. This Stipulation may be executed in counterparts and each signed counterpart
5 constitutes an original document.

- 1 This Stipulation is entered into by each Stipulating Party on the date entered below such
- 2 Stipulating Party's signature.

PACIFICORP

STAFF of the PUBLIC UTILITY
COMMISSION OF OREGON

By:  _____

By: _____

Date: 12-29-22 _____

Date: _____

ALLIANCE OF WESTERN ENERGY
CONSUMERS

By: _____

Date: _____

- 1 This Stipulation is entered into by each Stipulating Party on the date entered below such
- 2 Stipulating Party's signature.

PACIFICORP

STAFF of the PUBLIC UTILITY
COMMISSION OF OREGON

By: _____

By: /s/ Johanna Riemenschneider

Date: _____

Date: 12/29/2022

ALLIANCE OF WESTERN ENERGY
CONSUMERS

By: _____

Date: _____

1 This Stipulation is entered into by each Stipulating Party on the date entered below such
2 Stipulating Party's signature.

PACIFICORP

STAFF of the PUBLIC UTILITY
COMMISSION OF OREGON

By: _____

By: _____

Date: _____

Date: _____

ALLIANCE OF WESTERN ENERGY
CONSUMERS

By: /s/ Brent Coleman_____

Date: December 29, 2022_____

Docket No. UE 407
Exhibit Joint Stipulating
Parties/100

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

STIPULATING PARTIES

Joint Testimony of Matthew McVee, Bret Stevens, and Bradley Mullins in
Support of Stipulation

on behalf of

PacifiCorp, Public Utility Commission of Oregon Staff, Alliance of
Western Energy Consumers

December 2022

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Joint Testimony in Support of Stipulation..... 1

ATTACHED EXHIBITS

Exhibit Joint Stipulating Parties/101—Witness Qualification Statement of Bret Stevens

Exhibit Joint Stipulating Parties/102—Witness Qualification Statement of Bradley Mullins

1 **Q. Please state your names, business addresses, and present positions.**

2 A. My name is Matthew McVee, and my business address is 825 NE Multnomah Street,
3 Suite 2000, Portland, Oregon 97232. I am currently employed at PacifiCorp d/b/a
4 Pacific Power (PacifiCorp or Company) as Vice President, Regulatory Policy and
5 Operations. My witness qualifications are set forth in PAC/100, McVee/2.

6 My name is Bret Stevens. My Witness Qualification Statement is found in
7 Exhibit Joint Stipulating Parties/101.

8 My name is Bradley Mullins. My Witness Qualification Statement is found in
9 Exhibit Joint Stipulating Parties/102.

10 **JOINT TESTIMONY IN SUPPORT OF STIPULATION**

11 **Q. What is the purpose of this Joint Testimony?**

12 A. PacifiCorp, Public Utility Commission of Oregon (Commission) Staff, and the
13 Alliance of Western Energy Consumers (AWEC) (collectively the “Stipulating
14 Parties”) jointly provide this testimony in support of the Stipulation, filed concurrent
15 with this Joint Testimony. The Stipulating Parties request that the Commission issue
16 an order adopting the Stipulation without modification.

17 **Q. Does the Stipulation resolve all issues in docket UE 407?**

18 A. Yes. The Stipulation resolves all issues in PacifiCorp’s application for approval of an
19 automatic adjustment clause for recovery of costs associated with the Company’s
20 Wildfire Protection Plan (WPP),¹ filed on July 12, 2022 (Application).

¹ The Wildfire Protection Plan may also be referred to as a Wildfire Mitigation Plan or WMP as provided in OAR 860-300-0010(11).

1 **Q. What is a WPP?**

2 A. The WPP describes PacifiCorp’s comprehensive plan for wildfire mitigation in
3 compliance with the requirements in Oregon Administrative Rules 860-300-0020,
4 860-300-0030, and 860-300-0040. Due to the growing threat of catastrophic wildfire
5 in the western United States, PacifiCorp has developed a comprehensive plan for
6 wildfire mitigation efforts in all its western service territories.

7 **Q. Is PacifiCorp required to operate under a WPP?**

8 A. Yes. Oregon Revised Statute (ORS) 757.963(1) provides that “[a] public utility that
9 provides electricity must have and operate in compliance with a risk-based wildfire
10 protection plan that is filed with the Public Utility Commission and has been
11 evaluated by the commission.” A WPP may be approved or approved with conditions
12 by the Commission, under OAR 860-300-0020(3).

13 **Q. Has the Commission approved a WPP for PacifiCorp?**

14 A. Yes. The Commission approved PacifiCorp’s 2022 WPP on April 28, 2022.²

15 **Q. How often does PacifiCorp update its WPP?**

16 A. An updated WPP must be filed annually by December 31 per OAR 860-300-0020(2).

17 **Q. Does ORS 757.963(8) address the potential for recovery of costs associated with
18 a WPP in rates?**

19 A. Yes. ORS 757.963(8) allows for public utilities to recover through rates “[a]ll
20 reasonable operating costs incurred by, and prudent investments made by, a public
21 utility to develop, implement or operate a wildfire protection plan under this

² *In the Matter of PacifiCorp d/b/a Pacific Power 2022 Wildfire Mitigation Plan*, Docket No. UM 2207, Order No. 22-131 (April 28, 2022).

1 section[.]”

2 **Q. Has the Commission approved deferred accounting to track the Company’s**
3 **incremental costs and capital investments made to implement and operate its**
4 **WPP?**

5 A. Yes. On July 13, 2022, in Order 22-258, the Commission adopted Staff’s
6 recommendation to approve the deferred accounting of these costs.³

7 **Q. Is the Commission required to establish an automatic adjustment clause or other**
8 **method to provide for the timely recovery of, “[a]ll reasonable operating costs**
9 **incurred by, and prudent investments made by, a public utility to develop,**
10 **implement or operate a wildfire protection plan. . . .”⁴**

11 A. Yes. ORS 757.963(8) provides that the Commission “shall establish an automatic
12 adjustment clause, as defined in ORS 757.210, or another method to allow timely
13 recovery of the costs.”

14 **Q. What did PacifiCorp request in the Application initiating docket UE 407 on July**
15 **12, 2022?**

16 A. In the Application, PacifiCorp requested that the Commission: (1) approve a new rate
17 tariff Schedule 190, balancing account, and automatic adjustment clause for the
18 incremental operating costs and capital investments associated with the Company’s
19 WPP (WPP Adjustment); (2) find that the costs contained within the 2022 WPP are
20 reasonable and appropriate; and (3) find that the approximately \$19.9 million increase

³ *In the Matter of PacifiCorp, dba Pacific Power, Application for Approval of Deferral Accounting for Operating Costs and Capital Investments Made to Implement and Operate the Company’s Oregon Wildfire Protection Plan, Docket No. UM 2221, Order No. 22-258.*

⁴ ORS 757.963(8).

1 to PacifiCorp's annual revenue requirement for the incremental costs associated with
2 the 2022 WPP is just and reasonable. The Application also provided a WPP revenue
3 requirement, calculation of the proposed Schedule 190 rates, estimated effect of
4 proposed rates, proposed and revised tariff sheets, and a copy of PacifiCorp's 2022
5 WPP.

6 **Q. Please explain the WPP Adjustment as proposed by the Company in the**
7 **Application.**

8 A. As proposed in the Application, the Company would make an annual advice filing
9 adjusting Schedule 190 rates to reflect collection for the Company's projections of the
10 WPP incremental costs and used and useful capital investment for the coming year, as
11 well as incorporating any variances from the previous year. The forecast WPP
12 expense for the next calendar year would be based on the annual WPP. The residual
13 amounts in the balancing account may result in an increase or a decrease in the
14 amounts to be collected through the adjustment schedule. The combined forecast
15 amounts plus residual balance amount would be the total amount to be collected
16 through Schedule 190 rates for the year. The Company proposed to collect the
17 proposed revenue requirement through non-bypassable, per kilowatt-hour rates
18 calculated on a distribution rate spread. Calculation of the proposed Schedule 190,
19 WPP Adjustment rate spread and rates are shown in Attachment 2 of the Application.

20 **Q. Does the Stipulation provide for certain clarifications and adjustments to the**
21 **Company's proposed WPP Adjustment?**

22 A. Yes. The Stipulation provides for several clarifications and adjustments to the WPP
23 Adjustment as proposed in the Company's Application, which relate, but are not

1 limited, to:

- 2 • The treatment and recovery of operating costs associated with the Company
- 3 implementing and operating its WPP;
- 4 • The treatment and recovery of capital investments associated with the
- 5 Company implementing and operating its WPP;
- 6 • The information that PacifiCorp will provide as part of its WPP Adjustment
- 7 annual filings; and
- 8 • The effective date of new rates after the Company submits its WPP
- 9 Adjustment annual filing.

10 **Q. When will the WPP Adjustment expire under the Stipulation?**

11 A. The WPP Adjustment will continue until a replacement mechanism is approved by
12 the Commission under ORS 757.963(8). The Stipulating Parties may not propose
13 changes to this mechanism that would be effective prior to the annual filing that
14 would occur on July 1, 2025.

15 **Q. Do the Stipulating Parties believe that the WPP Adjustment provided for in the**
16 **Stipulation is consistent with the requirements in ORS 757.963(8)?**

17 A. Yes. ORS 757.963(8) authorizes the use of an automatic adjustment clause such as
18 this mechanism or another method to allow timely recovery of costs.

19 **Q. Do any of the Stipulating Parties contest the \$19.9 million increase to**
20 **PacifiCorp's annual revenue requirement associated with the prudent**
21 **incremental costs related to the 2022 WPP, as provided in the Application?**

22 A. No.

23 **Q. Would the recovery of this amount result in rates that are fair and reasonable?**

24 A. Yes. Recovery of this amount is consistent with ORS 757.963, because it allows the
25 Company timely recovery of reasonable and prudent costs associated with
26 implementing and operating its approved 2022 WPP. As such, Commission adoption
27 of the Stipulation will result in fair and reasonable rates and an efficient resolution of

1 this proceeding.⁵

2 **Q. Has any intervening party not joined the Stipulation?**

3 A. Yes. The Oregon Citizens' Utility Board (CUB) is not a party to the Stipulation.

4 CUB is the only party who has intervened in docket UE 407 and is not a party to the
5 Stipulation.

6 **Q. What is the basis for the Stipulation?**

7 A. The Company's initial Application filing,⁶ the Company's testimony and exhibits
8 filed on September 27, 2022,⁷ and this Joint Testimony creates an adequate record for
9 the Stipulation. In developing the Stipulation, the Company responded to data
10 requests and the Stipulating Parties resolved their differences through dialogue and
11 negotiations.

12 **Q. Please explain why the Stipulating Parties believe that the Commission should
13 adopt the Stipulation.**

14 A. The Stipulation creates a method to recover prudent costs associated with the
15 Company's implementation and operation of its WPP that is consistent with the
16 requirements in ORS 757.963. In particular, the Stipulation provides for the
17 reasonable treatment and recovery of incremental costs and capital investments
18 associated with the implementation and operation of PacifiCorp's WPP. The

⁵ Stipulation at ¶ 22 ("Any adjustment to PacifiCorp's Application not incorporated into the Stipulation directly or by reference would be resolved without an adjustment or recommendation for the purposes of this proceeding.").

⁶ The Application provided a description of the WPP Adjustment as proposed by the Company, an estimate of 2022 WPP costs, WPP revenue requirement, calculation of the proposed Schedule 190 rates, estimated effect of proposed rates, proposed and revised tariff sheets, and a copy of PacifiCorp's 2022 WPP.

⁷ The testimony of Matthew McVee supports and provides a description of the WPP Adjustment, as proposed by the Company in the Application. PAC/100, McVee. The testimony and exhibits of Allen Berreth supports the recovery of PacifiCorp's incremental costs and capital investments associated with the 2022 WPP. PAC/200, Berreth. The testimony and exhibits of Judith Ridenour provided for the rate spread, rates, and rate impact for Schedule 190, WPP Adjustment. PAC/200, Ridenour.

1 Stipulation further specifies the information that PacifiCorp will provide to the
2 intervening parties in its annual WPP Adjustment filings. The Stipulation represents
3 a reasonable compromise on the issues presented in this docket, among parties that
4 represent diverse interests, and should be adopted by the Commission without
5 modification.

6 **Q. Why does Staff support this Stipulation?**

7 A. Staff supports the Stipulation because it benefits customers. First, under the
8 Stipulation, there is no deferral of capital costs between the time that new investments
9 in plant come into service and when the plant costs are included in tariffs. This is a
10 benefit to customers as compared to having the mechanism include a deferral of
11 capital costs between when the plant is used and useful and when new rates including
12 those costs go into effect.

13 Second, existing rate base is adjusted each year for the effects of depreciation.
14 This benefit arises in part because the Stipulation keeps the WPP costs in a separate
15 mechanism rather than eventually folding the costs into base rates. If the WPP capital
16 plant were eventually included in overall rate base of a subsequent rate case, then the
17 WPP-related plant subsequent depreciation would only be updated whenever the next
18 rate case is filed and rates go into effect. PacifiCorp does not file general rate cases
19 each year. But depreciation is updated each year under the Stipulation and that would
20 not occur otherwise under standard regulation. Staff considers these factors a
21 material benefit to customers.

1 **Q. Besides providing benefits to customers, are there any other benefits of the**
2 **Stipulation?**

3 A. Yes. The Stipulation avoids a protracted legal debate over the treatment of capital
4 costs under the WPP legislation. As noted above, all prudent investments made to
5 develop, implement or operate a WPP are recoverable. Parties likely do not agree on
6 what exactly that means. For example, does it mean that all prudent WPP costs are
7 recovered in rates or does it mean the utility has the potential to recover all capital
8 costs? The Stipulation provides a mechanism for including capital costs supported by
9 the Stipulating Parties though differences of interpretation exist.

10 **Q. Does this conclude the joint testimony?**

11 A. Yes.

Docket No. UE 407
Exhibit Joint Stipulating
Parties/101

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

STIPULATING PARTIES

Exhibit Accompanying Testimony of Joint Stipulating Parties

Witness Qualification Statement of Bret Stevens

December 2022

Docket No. UE 407

WITNESS QUALIFICATIONS STATEMENT

NAME: Bret Stevens

EMPLOYER: Public Utility Commission of Oregon

TITLE: Senior Economist
Rates, Finance & Audit Division

ADDRESS: 201 High Street SE. Suite 100
Salem, OR 97301

EDUCATION: PhD, Agricultural & Resource Economics
Expected March 2023
University of California, Davis
Davis, CA

Master of Science, Agricultural & Resource Economics
University of California, Davis
Davis, CA

Bachelor of Arts, Economics & Environmental Studies
Western Washington University
Bellingham, WA

EXPERIENCE: I have been employed at the Public Utility Commission of Oregon since September of 2022. My primary responsibilities revolve around providing research and analysis on rate spread and rate design.

Prior to working for the Commission, I was employed by the University of California, Davis as a graduate student researcher, associate instructor, and teaching assistant. I taught courses on econometrics, finance, and microeconomics. My PhD dissertation covers the topics of climate change, finance, utility pricing, and resource efficiency.

Docket No. UE 407
Exhibit Joint Stipulating
Parties/102

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

STIPULATING PARTIES

Exhibit Accompanying Testimony of Joint Stipulating Parties

Witness Qualification Statement of Bradley Mullins

December 2022

MW ANALYTICS

Energy & Utility Consulting

Brad Mullins
Principal Consultant
Lummintie 13
FIN-90460 Oulunsalo, Finland
USA +1 503 841-1465
brmullins@mwanalytics.com
www.mwanalytics.com

ABOUT

MW Analytics is the professional consulting practice of Brad Mullins, a consultant and expert witness that represents utility customers in regulatory proceedings before state utility regulators. Brad has sponsored expert witness testimony in over 90 regulatory proceeding encompassing various subject matters, including revenue requirement, regulatory accounting, rate development, and new resource additions. MW Analytics has also assisted clients with informal regulatory, legislative and energy policy matters. In addition to providing regulatory services, MW Analytics also provides advisory, energy marketing and other energy consulting services.

EDUCATION AND WORK EXPERIENCE

Brad has a Master of Accounting degree from the University of Utah. After obtaining his master's degree, Brad worked as a Tax Consultant at Deloitte Tax in San Jose, California, specialized in research and development credits and deductions. Following Deloitte, Brad worked at PacifiCorp Energy as a Net Power Cost Analyst, responsible for preparing power cost forecasts, preparing testimony for regulatory filings, preparing annual power cost deferral filings, and developing qualifying facility avoided cost calculations.

REGULATORY APPEARANCES

Brad has sponsored expert witness testimony in the following regulatory proceedings:

Docket	Party	Topics
In re PacifiCorp 2021 Power Cost Adjustment Mechanism, Or.PUC Docket No. UE 404.	Alliance of Western Energy Consumers	Power Cost Deferral
<u>In re the Application of Dominion Energy Utah to Increase Distribution Rates and Charges and Make Tariff Modifications</u> Ut.PSC Docket No. 22-057-03	Nucor Steel-Utah	Cost of Service, Rate Spread and Rate Design
<u>In re Joint Application of Nevada Power Company d/b/a NV Energy ("NPC") and Sierra Pacific Power Company d/b/a NV Energy ("SPPC") for approval to merge into a single corporate entity, to transfer Certificates of Public Convenience and Necessity ("CPC") 685 Sub 20, 688, and 688 Sub 6 from SPPC to NPC, and to consolidate generation assets.</u> PUC Nv. Docket No. 22-03028.	Wynn Las Vegas, LLC and Smart Energy Alliance	Merger
<u>In re Puget Sound Energy Requests for a General Rate Revision.</u> Wa.UTC Docket. UE-220026 (cons.).	Alliance of Western Energy Consumers	Revenue Requirement
<u>In re Northwest Natural Gas Company, dba, NW Natural, Updated Depreciation Study Pursuant to OAR 860-027-0350.</u> Or.PUC Docket No. UM 2214.	Alliance of Western Energy Consumers	Depreciation
<u>In re Portland General Electric Company, 2023 Annual Update Tariff, Schedule 125.</u> Or.PUC Docket No. UE 402.	Alliance of Western Energy Consumers	Revenue Requirement / Cost of Service
<u>In re PacifiCorp d.b.a Pacific Power, Request for a General Rate Revision.</u> Or.PUC Docket No. UE 399.	Alliance of Western Energy Consumers	Revenue Requirement

Docket	Party	Topics
<u>In re the Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of the cost recovery of the regulatory assets relating to the development and implementation of their Joint Natural Disaster Protection Plan., PUC NV. Docket No. 22-03006.</u>	Alliance of Western Energy Consumers	Single-Issue Rate Filing
<u>In re PacifiCorp d.b.a. Pacific Power, 2023 Transition Adjustment Mechanism, Or.PUC Docket No. UE 400.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re Cascade Natural Gas Corporation, Request for a General Rate Revision, Wa.UTC Docket No. UG-210755</u>	Alliance of Western Energy Consumers	Revenue Requirement / Cost of Service
<u>In re Northwest Natural Gas Company, dba NW Natural, Request for A General Rate Revision, Or.PUC. Docket No. UG 435</u>	Alliance of Western Energy Consumers	Revenue Requirement / Cost of Service
<u>In re Formal Complaint of Tree Top Inc. against Cascade Natural Gas Corporation, Wa.UTC Docket No. UG-210745</u>	Tree Top, Inc.	Overrun Entitlement
<u>In re Northwest Natural Gas Company, dba NW Natural, Request for Approval of an Affiliated Interest Agreement with Lexington Renewables, LLC, Or.PUC. Docket No. UI 451.</u>	Alliance of Western Energy Consumers	Affiliated Interest
<u>In re Avista Corporation, Request for a General Rate Revision, Or.PUC Docket No. UG 433</u>	Alliance of Western Energy Consumers	Revenue Requirement / Cost of Service
<u>In re PacifiCorp Power Cost Only Rate Case, Wa.UTC Docket No. UE-210402.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re PacifiCorp Limited Issue Rate Filing, Wa.UTC Docket No. UE-210532.</u>	Alliance of Western Energy Consumers	Revenue Requirement / Settlement
<u>In re the Application of Rocky Mountain Power for Authority to Increase Its Rates and Charges in Idaho and Approval of Proposed Electric Service Schedules and Regulations, Id.PUC Case No. PAC-E-21-07.</u>	PacifiCorp Idaho Industrial Customers	Revenue Requirement / Settlement
<u>In re Portland General Electric, Request for a General Rate Revision, Or.PUC Docket No. UE 394.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their Economic Recovery Transportation Electrification Plan for the period 2022-2024, PUC Nv. Docket No. 21-09004</u>	Nevada Resort Association	Transportation Electrification
<u>In re PacifiCorp, dba Pacific Power, 2020 Power Cost Adjustment Mechanism, Or.PUC Docket No. UE 392.</u>	Alliance of Western Energy Consumers	Power Cost Deferral
<u>In re the Application of Rocky Mountain Power for Authority to Decrease Current Rates by \$14.9 Million to Refund Deferred Net Power Costs Under Tariff Schedule 95 Energy Cost Adjustment Mechanism and to Decrease Current Rates by \$166 Thousand Under Tariff Schedule 93, REC and SO2 Revenue Adjustment Mechanism, Wy.PSC Docket No. 20000-599-EM-21.</u>	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>In re Portland General Electric 2021 Annual Update Tariff Schedule 125, Or. PUC Docket No. UE 391.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of a regulatory asset account to recover costs relating to the development and implementation of their Joint Natural Disaster Protection Plan, PUC NV. Docket No. 21-03004.</u>	Wynn Las Vegas, LLC; Smart Energy Alliance	Single-Issue Rate Filing
<u>In re PacifiCorp d.b.a. Pacific Power, 2022 Transition Adjustment Mechanism, Or.PUC Docket No. UE 390.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re Avista 2020 General Rate Case, Wa.U.T.C. Docket No. UE-200900 (Cons.).</u>	Alliance of Western Energy Consumers	Revenue Requirement

Docket	Party	Topics
<u>In re NV Energy's Fourth Amendment to Its 2018 Joint Integrated Resource Plan</u> , PUC Nv. Docket No 20-07023.	Wynn Las Vegas, LLC; Smart Energy Alliance	Transmission Planning
<u>In Re Cascade Natural Gas Corporation, 2020 General Rate Case</u> , Wa.U.T.C. Docket No. UG-200568	Alliance of Western Energy Consumers	Revenue Requirement
<u>In re Cascade Natural Gas Corporation, Petition to File Depreciation Study</u> , Or.PUC Docket No. UM 2073	Alliance of Western Energy Consumers	Depreciation Rates
<u>In re the Application of Rocky Mountain Power for Authority to Increase Current Rates By \$7.4 Million to Recover Deferred Net Power Costs Under Tariff Schedule 95 Energy Cost Adjustment Mechanism and to Decrease Current Rates by \$604 Thousand Under Tariff Schedule 93, Rec and So2 Revenue Adjustment Mechanism</u> , Wy.PSC Docket No. 20000-582-EM-20	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>In re the Complaint of Willamette Falls Paper Company and West Linn Paper Company against Portland General Electric Company</u> , Or.PUC Docket No. UM 2107	Willamette Falls Paper Company	Consumer Direct Access, Tariff Dispute
<u>In re The Application of Rocky Mountain Power for Authority to Increase its Retail Electric Service Rates by Approximately \$7.1 Million Per Year or 1.1 Percent, to Revise the Energy Cost Adjustment Mechanism, and to Discontinue Operations at Cholla Unit 4</u> , Wy.PSC Docket No. 2000-578-ER-20	Wyoming Industrial Energy Consumers	Power Cost Modeling
<u>Avista Corporation 2021 General Rate Case</u> , Or.PUC Docket No. UG 389	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re NW Natural Request for a General Rate Revision</u> , Or.PUC Docket No. UG 388.	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re PacifiCorp, Request to Initiate an Investigation of Multi-Jurisdictional Issues and Approve an Inter-Jurisdictional Cost Allocation Protocol</u> , Or.PUC, UM 1050.	Alliance of Western Energy Consumers	Jurisdictional Allocation
<u>In re Puget Sound Energy 2019 General Rate Case</u> , Wa.UTC Docket No. UE 190529.	Alliance of Western Energy Consumers	Revenue Requirement, Coal Retirement Costs
<u>Avista Corporation 2020 General Rate Case</u> , Wa.UTC Docket No. UE-190334 (Cons.)	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Cascade Natural Gas Corporation Application for Approval of a Safety Cost Recovery Mechanism</u> , Or. PUC Docket No. UM 2026.	Alliance of Western Energy Consumers	Ratemaking Policy
<u>In re Avista Corporation, Request for a General Rate Revision</u> , Or.PUC Docket No. UG 366.	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Portland General Electric, 2020 Annual Update Tariff (Schedule 125)</u> , Or.PUC Docket No UE 359.	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re PacifiCorp 2020 Transition Adjustment Mechanism</u> , Or.PUC Docket No. UE 356.	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re PacifiCorp 2020 Renewable Adjustment Clause</u> , Or.PUC Docket No. UE 352.	Alliance of Western Energy Consumers	Single-Issue Rate Filing
<u>2020 Joint Power and Transmission Rate Proceeding</u> , Bonneville Power Administration, Case No. BP-20.	Alliance of Western Energy Consumers	Revenue Requirement, Policy
<u>In the Matter of the Application of MSG Las Vegas, LLC for a Proposed Transaction with a Provider of New Electric Resources</u> , PUC Nv. Docket No. 18-10034	Madison Square Garden	Customer Direct Access
<u>Puget Sound Energy 2018 Expedited Rate Filing</u> , Wa.UTC Dockets UE-180899/UG-180900 (Cons.).	Alliance of Western Energy Consumers	Revenue Requirement, Settlement

Docket	Party	Topics
<u>Georgia Pacific Gypsum LLC's Application to Purchase Energy, Capacity, and/or Ancillary Services from a Provider of New Electric Resources, PUC Nv. Docket No. 18-09015.</u>	Georgia Pacific	Customer Direct Access
<u>Joint Application of Nevada Power Company d/b/a NV Energy for approval of their 2018-2038 Triennial Integrated Resource Plan and 2019-2021 Energy Supply Plan, PUCN Docket No. 18-06003.</u>	Smart Energy Alliance	Resource Planning
<u>In re Cascade Natural Gas Corporation Request for a General Rate Revision, Or.PUC, Docket No. UE 347.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Portland General Electric Company Request for a General Rate Revision, Or.PUC Docket No UE 335.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Northwest Natural Gas Company, dba NW Natural, Request for a General Rate Revision, Or.PUC Docket No. UG 344.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Cascade Natural Gas Corporation Request for a General Rate Revision, Wa.UTC, Docket No. UE-170929.</u>	Northwest Industrial Gas Users	Revenue Requirement, Rate Design
<u>In the Matter of Hydro One Limited, Application for Authorization to Exercise Substantial Influence over the Policies and Actions of Avista Corporation, Or.PUC, Docket No. UM 1897.</u>	Alliance of Western Energy Consumers	Merger
<u>Application of Rocky Mountain Power for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of Resource Decision, Ut.PSC Docket No. 17-035-40</u>	Utah Industrial Energy Consumers, & Utah Associated Energy Users	New Resource Addition
<u>In re PacifiCorp, dba Rocky Mountain Power, for a CPCN and Binding Ratemaking Treatment for New Wind and Transmission Facilities, Id.PUC Case No. PAC-E-17-07</u>	PacifiCorp Idaho Industrial Customers	New Resource Addition
<u>In re PacifiCorp, dba Pacific Power, 2016 Power Cost Adjustment Mechanism, Or.PUC, Docket No. UE 327.</u>	Alliance of Western Energy Consumers	Power Cost Deferral
<u>In re PacifiCorp 2016 Power Cost Adjustment Mechanism, Wa.UTC Docket No. UE-170717</u>	Boise Whitepaper, LLC	Power Cost Deferral
<u>In re Avista Corporation 2018 General Rate Case, Wa.UTC Dockets UE-170485 and UG-170486 (Consolidated).</u>	Industrial Customers of Northwest Utilities, & Northwest Industrial Gas Users	Revenue Requirement, Rate Design
<u>Application of Nevada Power Company d/b/a NV Energy for authority to adjust its annual revenue requirement for general rates charged to all classes of electric customers and for relief properly related thereto, PUCN. Docket No. 17-06003.</u>	Smart Energy Alliance	Revenue Requirement
<u>In re the Application of Rocky Mountain Power for Authority to Decrease Current Rates by \$15.7 Million to Refund Deferred Net Power Costs Under Tariff Schedule 95 Energy Cost Adjustment Mechanism and to Decrease Current Rates By \$528 Thousand Under Tariff Schedule 93, REC and SO2 Revenue Adjustment Mechanism, Wy. PSC, Docket No. 20000-514-EA-17 (Record No. 14696).</u>	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>In re the 2018 General Rate Case of Puget Sound Energy, Wa.UTC, Docket No. UE-170033 (Cons.).</u>	Industrial Customers of Northwest Utilities, & Northwest Industrial Gas Users	Revenue Requirement, Rate Design
<u>In re PacifiCorp, dba Pacific Power, 2018 Transition Adjustment Mechanism, Or.PUC, Docket No. UE 323.</u>	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company, Request for a General Rate Revision, Or.PUC, Docket No. UE 319.</u>	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design
<u>In re Portland General Electric Company, Application for Transportation Electrification Programs, Or.PUC, UM 1811.</u>	Industrial Customers of Northwest Utilities	Electric Vehicle Charging

Docket	Party	Topics
<u>In re Pacific Power & Light Company, Application for Transportation Electrification Programs</u> , Or.PUC, Docket No. UM 1810.	Industrial Customers of Northwest Utilities	Single-issue Ratemaking
<u>In re the Public Utility Commission of Oregon, Investigation to Examine PacifiCorp, dba Pacific Power's Non-Standard Avoided Cost Pricing</u> , Or.PUC, Docket No. UM 1802.	Industrial Customers of Northwest Utilities	Qualifying Facilities
<u>In re Pacific Power & Light Co., Revisions to Tariff WN U-75, Advice No. 16-05, to modify the Company's existing tariffs governing permanent disconnection and removal procedures</u> , Wa.UTC, Docket No. UE-161204.	Boise Whitepaper, LLC	Customer Direct Access
<u>In re Puget Sound Energy's Revisions to Tariff WN U-60, Adding Schedule 451, Implementing a New Retail Wheeling Service</u> , Wa.UTC, Docket No. UE-161123.	Industrial Customers of Northwest Utilities	Customer Direct Access
<u>2018 Joint Power and Transmission Rate Proceeding</u> , Bonneville Power Administration, Case No. BP-18.	Industrial Customers of Northwest Utilities	Revenue Requirement, Policy
<u>In re Portland General Electric Company Application for Approval of Sale of Harborton Restoration Project Property</u> , Or.PUC, Docket No. UP 334 (Cons.).	Industrial Customers of Northwest Utilities	Environmental Deferral
<u>In re An Investigation of Policies Related to Renewable Distributed Electric Generation</u> , Ar.PSC, Matter No. 16-028-U.	Arkansas Electric Energy Consumers	Net Metering
<u>In re Net Metering and the Implementation of Act 827 of 2015</u> , Ar.PSC, Matter No. 16-027-R.	Arkansas Electric Energy Consumers	Net Metering
<u>In re the Application of Rocky Mountain Power for Approval of the 2016 Energy Balancing Account</u> , Ut.PSC, Docket No. 16-035-01	Utah Associated Energy Users	Power Cost Deferral
<u>In re Avista Corporation Request for a General Rate Revision</u> , Wa.UTC, Docket No. UE-160228 (Cons.).	Industrial Customers of Northwest Utilities, & Northwest Industrial Gas Users	Revenue Requirement, Rate Design
<u>In re the Application of Rocky Mountain Power to Decrease Current Rates by \$2.7 Million to Recover Deferred Net Power Costs Pursuant to Tariff Schedule 95 and to Increase Rates by \$50 Thousand Pursuant to Tariff Schedule 93</u> , Wy.PSC, Docket No. 20000-292-EA-16.	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>In re PacifiCorp, dba Pacific Power, 2017 Transition Adjustment Mechanism</u> , Or.PUC, Docket No. UE 307.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company, 2017 Annual Power Cost Update Tariff (Schedule 125)</u> , Or.PUC, Docket No. UE 308.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Pacific Power & Light Company, General rate increase for electric services</u> , Wa.UTC, Docket No. UE-152253.	Boise Whitepaper, LLC	Revenue Requirement, Rate Design
<u>In The Matter of the Application of Rocky Mountain Power for Authority of a General Rate Increase in Its Retail Electric Utility Service Rates in Wyoming of \$32.4 Million Per Year or 4.5 Percent</u> , Wy.PSC, Docket No. 20000-469-ER-15.	Wyoming Industrial Energy Consumers	Power Cost Modeling
<u>In re Avista Corporation, General Rate Increase for Electric Services</u> , Wa.UTC, Docket No. UE-150204.	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design
<u>In re the Application of Rocky Mountain Power to Decrease Rates by \$17.6 Million to Recover Deferred Net Power Costs Pursuant to Tariff Schedule 95 to Decrease Rates by \$4.7 Million Pursuant to Tariff Schedule 93</u> , Wy.PSC, Docket No. 20000-472-EA-15.	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>Formal complaint of The Walla Walla Country Club against Pacific Power & Light Company for refusal to provide disconnection under Commission-approved terms and fees, as mandated under Company tariff rules</u> , Wa.UTC, Docket No. UE-143932.	Columbia Rural Electric Association	Customer Direct Access / Customer Choice

Docket	Party	Topics
<u>In re PacifiCorp, dba Pacific Power, 2016 Transition Adjustment Mechanism, Or.PUC, Docket No. UE 296.</u>	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company, Request for a General Rate Revision, Or.PUC, Docket No. UE 294.</u>	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design
<u>In re Portland General Electric Company and PacifiCorp dba Pacific Power, Request for Generic Power Cost Adjustment Mechanism Investigation, Or.PUC, Docket No. UM 1662.</u>	Industrial Customers of Northwest Utilities	Power Cost Deferral
<u>In re PacifiCorp, dba Pacific Power, Application for Approval of Deer Creek Mine Transaction, Or.PUC, Docket No. UM 1712.</u>	Industrial Customers of Northwest Utilities	Single-issue Ratemaking
<u>In re Public Utility Commission of Oregon, Investigation to Explore Issues Related to a Renewable Generator's Contribution to Capacity, Or.PUC, Docket No. UM 1719.</u>	Industrial Customers of Northwest Utilities	Resource Planning
<u>In re Portland General Electric Company, Application for Deferral Accounting of Excess Pension Costs and Carrying Costs on Cash Contributions, Or.PUC, Docket No. UM 1623.</u>	Industrial Customers of Northwest Utilities	Single-issue Ratemaking
<u>2016 Joint Power and Transmission Rate Proceeding, Bonneville Power Administration, Case No. BP-16.</u>	Industrial Customers of Northwest Utilities	Revenue Requirement, Policy
<u>In re Puget Sound Energy, Petition to Update Methodologies Used to Allocate Electric Cost of Service and for Electric Rate Design Purposes, Wa.UTC, Docket No. UE-141368.</u>	Industrial Customers of Northwest Utilities	Cost of Service
<u>In re Pacific Power & Light Company, Request for a General Rate Revision Resulting in an Overall Price Change of 8.5 Percent, or \$27.2 Million, Wa.UTC, Docket No. UE-140762.</u>	Boise Whitepaper, LLC	Revenue Requirement, Rate Design
<u>In re Puget Sound Energy, Revises the Power Cost Rate in WN U-60, Tariff G, Schedule 95, to reflect a decrease of \$9,554,847 in the Company's overall normalized power supply costs, Wa.UTC, Docket No. UE-141141.</u>	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re the Application of Rocky Mountain Power for Authority to Increase Its Retail Electric Utility Service Rates in Wyoming Approximately \$36.1 Million Per Year or 5.3 Percent, Wy.PSC, Docket No. 20000-446-ER-14.</u>	Wyoming Industrial Energy Consumers	Power Cost Modeling
<u>In re Avista Corporation, General Rate Increase for Electric Services, RE, Tariff WN U-28, Which Proposes an Overall Net Electric Billed Increase of 5.5 Percent Effective January 1, 2015, Wa.UTC, Docket No. UE-140188.</u>	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design, Power Costs
<u>In re PacifiCorp, dba Pacific Power, Application for Deferred Accounting and Prudence Determination Associated with the Energy Imbalance Market, Or.PUC, Docket No. UM 1689.</u>	Industrial Customers of Northwest Utilities	Single-issue Ratemaking
<u>In re PacifiCorp, dba Pacific Power, 2015 Transition Adjustment Mechanism, Or.PUC, Docket No. UE 287.</u>	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company, Request for a General Rate Revision, Or.PUC, Docket No. UE 283.</u>	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design
<u>In re Portland General Electric Company's Net Variable Power Costs (NVPC) and Annual Power Cost Update (APCU), Or.PUC, Docket No. UE 286.</u>	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company 2014 Schedule 145 Boardman Power Plant Operating Adjustment, Or.PUC, Docket No. UE 281.</u>	Industrial Customers of Northwest Utilities	Coal Retirement
<u>In re PacifiCorp, dba Pacific Power, Transition Adjustment, Five-Year Cost of Service Opt-Out (adopting testimony of Donald W. Schoenbeck), Or.PUC, Docket No. UE 267.</u>	Industrial Customers of Northwest Utilities	Customer Direct Access