



# Oregon

Theodore R. Kulongoski, Governor

## Public Utility Commission

550 Capitol St NE Ste 215

**Mailing Address:** PO Box 2148

Salem, OR 97308-2148

**Consumer Services**

1-800-522-2404

Local: 503-378-6600

**Administrative Services**

503-373-7394

June 9, 2010

OREGON PUBLIC UTILITY COMMISSION  
ATTENTION: FILING CENTER  
PO BOX 2148  
SALEM OR 97308-2148

RE: **Docket No. UE 215** - In the Matter of PORTLAND GENERAL ELECTRIC  
COMPANY REQUEST FOR A GENERAL RATE REVISION.

Enclosed for electronic filing in the above-captioned docket is the Public Utility Commission Staff's Exhibit 200 Opening Testimony that replaces Exhibit 200 filed on June 4, 2010. Also enclosed is a Summary of Corrections to Exhibit 200. The replacement Exhibit 200 and Summary Page will be sent to the parties in this proceeding.

*/s/ Lois Meerdink*

Lois Meerdink

Regulatory Operations Division

Filing on Behalf of Public Utility Commission Staff

(503) 378-8959

Email: [Lois.Meerdink@state.or.us](mailto:Lois.Meerdink@state.or.us)

cc: UE 215 Service List - parties



**Summary of corrections to Exhibit 200 in UE 215**

<b>Location in original testimony</b>	<b>Description of correction</b>	<b>Location in corrected testimony</b>
P.3, line 7	Correct spelling of "DTERMINE"	Same
p.6, ln.20	Insert the word "comparable"	Same
p.6, line 22	Delete "the" and replace with "than PGE's".	Same
p.6, lines 11 & 15	Delete commas	Same
p.6, line 13	Delete space between 1.45 and %	Same
P.7, line 9	Delete "the" and replace with "PGE's".	
p.7, line 11	Add "excluding officers"	Page 7, line 9
p.8, lines 1&2	Moved to bottom of page 7	Page 7, lines 15 & 16
p.9, lines 1&2	Moved to bottom of page 8	Page 8, lines 8&9
p. 10, lines 1-3	Moved to bottom of page 9	Page 9, lines 21-23
p.10, line 20	Table 6: Moved upward	Page 10, line 17
p.11, lines 7-11	Deleted full sentence beginning on line 7 and through end of line 11. Insert new sentence beginning on line 7: <i>"The result is \$130.2 million in wages and salaries for the Exempt and Non-Exempt classes."</i>	Page 11, lines 7 and 8
p.12, line 13	Delete full sentence beginning on line 13 and ending on line 14.	n/a
p.13, lines 3-6	Change italic font to regular	Same page

CASE: UE-215  
WITNESS: Moshrek Sobhy

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**STAFF EXHIBIT 200**

**Opening Testimony**

**June 4, 2010**

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS**  
2 **ADDRESS.**

3 A. My name is Moshrek Sobhy. My position is Senior Utility and Energy Analyst  
4 with the Public Utility Commission of Oregon (Commission). My business  
5 address is 550 Capitol Street NE Suite 215, Salem, Oregon 97301-2551.

6 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK**  
7 **EXPERIENCE.**

8 A. My Witness Qualification Statement is found in Exhibit Staff/201.

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 A. I am sponsoring Staff testimony with respect to the wages and salaries in  
11 Portland General Electric's (PGE or the Company) case UE 215.

12 **Q. DID YOU PREPARE AN EXHIBIT FOR THIS DOCKET?**

13 A. Yes. I prepared the following exhibits:

14 Exhibit 200 consisting of pages 1 – 13: Testimony

15 Exhibit 201: Qualifications

16 Exhibit 202: Supporting Work Papers

17 **Q. WHAT IS YOUR RECOMMENDATION WITH RESPECT TO PGE'S**  
18 **WAGES AND SALARIES?**

19 A. My recommendation is to reduce PGE's proposed wages and salaries from  
20 \$202,906,420 to \$195,778,769, a net reduction of approximately (\$7.1 million).

21

22

23

1 **PGE'S PROPOSED WAGES AND SALARIES**

2 **Q. PLEASE DESCRIBE THE COMPANY'S FULL TIME EQUIVALENTS (FTE).**

3 A. In PGE's Exhibit 500, the Company states that it uses the FTE in its annual  
4 budgeting process to determine the number of labor hours required to  
5 accomplish the work. The number of FTEs is calculated by dividing total labor  
6 hours by the number of work hours during the year. The number of work hours  
7 during the year is 2080, or the product of 40 hours per week times multiplied by  
8 52 weeks (the number of weeks in a calendar year).

9 **Q. WHY DOES THE COMPANY USE THE FTE NUMBER INSTEAD OF A**  
10 **SIMPLE EMPLOYEES HEAD COUNT TO DETERMINE THE TEST YEAR**  
11 **WAGES AND SALARIES?**

12 A. In PGE exhibit 500, PGE witnesses, Arleen Barnett and Joyce Bell (the  
13 witnesses), explain that an employee who was hired in the middle of the year  
14 would be budgeted as one half (or 0.5) FTE. In a head count, this employee  
15 will count as one.

16 **Q. ARE THERE NECESSARY ADJUSTMENTS TO BE CONSIDERED WHEN**  
17 **CALCULATING FTE?**

18 A. Yes. It is critical to remove paid and non-paid over time both in hours and in  
19 dollars when calculating FTEs for historical and future periods. Failure to do  
20 this adjustment will result in overstating the number of FTEs and will skew the  
21 wages and salaries corresponding to the FTEs. This overstatement will  
22 translate into rates charged to the customers.

1 **Q. HOW DID THE COMPANY PRESENT THE FTE IN ITS CALCULATIONS**  
2 **OF TEST YEAR 2011 WAGES AND SALARIES?**

3 A. The witnesses testified in PGE/500 that the overtime was excluded from the  
4 actual total FTEs. Also, in response to Staff data request # 157, the company  
5 stated that overtime was not included in the FTE calculations of the historical  
6 and future periods.

7 **Q. HOW DID THE COMPANY DETERMINE THE WAGES AND SALARIES IN**  
8 **THE TEST YEAR?**

9 A. In PGE/500 and supporting work papers, the Company presented that its' the  
10 wages and salaries base budget during 2011 is \$211,520,465. Due to  
11 significant workforce reduction associated with Advanced Metering  
12 Infrastructure (AMI), and increases in other areas, the Company made  
13 adjustments to its base budget workforce. Details of the workforce adjustment  
14 in the test year are summarized below in Table 1.

15 **Table 1 – PGE's Test Year net FTE reduction**

<b>AREA</b>	<b>Increase (decrease) in FTEs</b>
Administrative & General (A&G)/ IT	10.0
Customer service, including AMI	(117.8)
Generation	19.9
Transmission & Distribution	5.2
Total	(82.7)

16

1 With respect to the test year salaries adjustment, PGE's witnesses explain in  
 2 PGE/500 that \$8.0 million representing approximately 99 FTEs were removed  
 3 from wages and salaries' base budget in 2011 to account for vacancies and  
 4 unfilled positions. Additional details were included in the Company's response  
 5 to staff data request DR-221 (see copy in exhibit 202). A summary of the  
 6 company's information is in Table 2 below:

7 **Table 2 – PGE's Test Year wages and salaries adjustment**

Description	FTEs adjustment	Salary adjustment (\$)
Adjustments for vacant positions	(99.4)	(8,000,000)
Outboard adjustments to revenue requirement	(10.0)	(614,045)
Impact of previously authorized items <sup>1</sup>	(8.2)	0
Total	(117.6)	(8,614,045)

8  
 9 **Q. WHAT IS PGE'S PROPOSED WAGES AND SALARIES IN THE TEST**  
 10 **YEAR?**

11 A. After making the above adjustments to the base budget, the Company proposes  
 12 \$202,906,420, in test year wages and salaries as summarized in table 3 below:  
 13  
 14

<sup>1</sup> The Company did not make salary adjustments corresponding to these FTE reductions because no expenses above the 2008 base rates were added (see attachment 221 A in staff exhibit 202)

**Table 3 – PGE’s proposed Test Year FTE and, wages and salaries**

	<b>FTEs</b>	<b>Wages &amp; Salaries</b>
2011 base budget	2,647	\$211,520,465
Adjustments	(118)	(\$8,614,045)
2011 Test Year	2,529	\$202,906,420

**Q. DID THE COMPANY ALLOCATE THE TEST YEAR’S FTEs AND SALARIES AMONG ITS CLASSES OF EXEMPT, NON-EXEMPT, OFFICERS, AND UNION EMPLOYEES?**

A. No. The Company reflected the FTEs adjustment in the test year by area of operation, e.g. Administrative and General (A&G/IT), Customer Accounting, Customer Service, Transmission and Distribution (T&D), and Generation.

**STAFF ADJUSTMENT**

**Q. PLEASE DESCRIBE THE BASIS OF YOUR ADJUSTMENT.**

A. My adjustment results from using the 2009 Market Compensation for PGE’s workforce as the basis to calculate the Company’s test year wages and salaries.

**Q. HOW DID YOU APPROACH REVIEWING THE COMPANY’S WAGES AND SALARIES IN THIS PROCEEDING?**

A. The first step was to review the Company’s proposed wages and salaries in the current proceeding, i.e. UE-215, in light of the information provided by the Company, the previous Commission Order No. 09-020, and other information previously provided by the Company in UE-197. The second step was



1 reviewing the Commission's methodology in determining the test year's wages  
2 and salaries in Order No. 09-020 in UE-197. The third step was to determine a  
3 starting point for the determination for the base year wages and salaries,  
4 consistent with the Commission practice in Order No. 09-020. The final step  
5 was determining the test year's wages and salaries consistent with the  
6 Commission's methodology in Order No 09-020.

7 **Q. PLEASE DESCRIBE THE COMMISSION'S METHODOLOGY IN**  
8 **DETERMINING THE WAGES AND SALARIES IN UE-197.**

9 A. In Order No. 09-020, the Commission started with the base year 2007 actual  
10 wages and salaries of \$178,505,742, (excluding officers). This represented a  
11 workforce of 2,546 FTEs (net of officers). The Commission then applied an  
12 annual workforce rate growth of 1.45 % and an annual wage escalation factor  
13 of 2.4%. (See copy of page 10 of Order No. 09-020 in staff exhibit 202). The  
14 wages and salaries for the 2009 test year in UE-197 was \$192,697,069,  
15 (excluding officers).

16 **Q. DID PGE PROVIDE INFORMATION WITH RESPECT TO ITS**  
17 **WORKFORCE MARKET COMPENSATION IN UE-197?**

18 A. Yes. In UE-197, the Company's work paper 5 in PGE/800, (see copy in exhibit  
19 202), include the market compensation for the Company's employees  
20 (excluding officers) of \$179,586,393. This is approximately \$1.0 million more  
21 the base year wages and salaries as shown in Order No. 09-020. This  
22 difference represents approximately 0.6% of the market compensation level.

1 **Q. WHAT IS THE BASE YEAR IN DETERMINING THE WAGES AND**  
2 **SALARIES IN THIS PROCEEDING?**

3 A. I used the historic year 2009 as the base year to determine the test year's  
4 wages and salaries.

5 **Q. HOW DO THE WAGES AND SALARIES DURING THE HISTORIC YEARS**  
6 **2007 THROUGH 2009 COMPARE?**

7 A. Below is a summary of comparison between the actual wages and salaries vs.  
8 the market compensation during these years as follows:

9 **Table 4 – Actual W&S vs. Market Compensation**

	Market Compensation (A)	Actual wages and salaries (B)	Difference (B-A)	% difference (B-A)/A
2007	\$179,586,393	\$178,505,742	(\$1,080,651)	(0.6%)
2008	\$183,884,000	\$188,040,000	\$4,156,000	2.26%
2009	\$188,657,000	\$193,799,000	\$5,142,000	2.72%

10

11 **Q. DID THE COMPANY PROVIDE MARKET COMPENSATION FOR ITS**  
12 **WORKFORCE DURING 2008 AND 2009?**

13 A. Yes. In response to staff data request nos. DR-211 and DR-212, the Company  
14 provided information on actual wages and salaries and market compensation  
15 for 2008 and 2009. (Copies of company responses included in staff exhibit  
16 202). Table 5 is a summary of the information included in Staff exhibit 202:

17

1 **Table 5 – Comparison market compensation vs. actual salaries (\$000)**  
 2 **(2008 & 2009)**

	FTEs	Market Compensation	Actual	actual less market
<b>2009</b>	<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D = C-B)</b>
Exempt	1,215	103,276	109,550	6,274
Non-exempt	576	25,925	24,793	(1,132)
Union	819	59,456	59,456	-
Officer	13	3,520	3,394	(126)
Total 2009	2,623	192,177	197,193	<b>5,016</b>
<b>2008</b>				
Exempt	1,188	100,924	106,224	5,300
Non-exempt	589	25,873	24,729	(1,144)
Union	824	57,087	57,087	-
Officer	11	3,300	3,127	(173)
Total 2008	2,612	187,184	191,167	<b>3,983</b>
<b>Cumulative 2008 and 2009 combined difference</b>				<b>8,999</b>

3  
 4 **Q. HOW DID STAFF DETERMINE THAT PGE'S PROPOSED WAGES AND**  
 5 **SALARIES ARE EXCESSIVE?**

6 The comparison in Table 5 above demonstrates that the Company paid its  
 7 employees approximately \$9 million in wages and salaries above market  
 8 compensation during 2008 and 2009 combined (column D) unlike in 2007 as  
 9 shown previously. Market compensation represents a reasonable and fair

1 basis to determine future test year's wages and salaries after applying  
2 appropriate workforce and wages escalation factors.

3 **Q. IS MARKET COMPENSATION FAIR, JUST AND REASONABLE TO**  
4 **DETERMINE WAGES AND SALARIES FOR RATE MAKING PURPOSES?**

5 A. Yes. Allowing wages market compensation based wages and salaries in  
6 revenue requirements ensure that the Company pays competitive salaries to  
7 hire and retain skilled and qualified workforce needed to operate the utility  
8 efficiently. This in turn assures that ratepayers receive reliable and affordable  
9 service. Staff recommends that amounts paid in excess of market  
10 compensation not to be allowed in revenue requirements.

11 **Q. WHAT IS THE STARTING POINT FOR STAFF ADJUSTMENT?**

12 A. I started with the average salary in PGE's market compensation for exempt  
13 and non-exempt employees during 2009. The combined market compensation  
14 for these two classes was divided by the sum of their FTEs in the test year to  
15 determine the average salary per FTE. The average salary was escalated by  
16 an annual wage escalator rate to determine the test year average salary.  
17 Salaries for union employees and the Company's officers are determined  
18 separately as explained later in the testimony.

19 **Q. HOW DID STAFF DETERMINE THE ANNUAL WAGE ESCALATION**  
20 **RATE?**

21 A. In Order No. 09-020 in docket UE 197, the Commission used the 3-year  
22 average of Consumer Price Index (CPI)-all urban, to account for inflation in  
23 determining the test year's average salary per FTE. The three-year average in

1 this proceeding would include the 2009 CPI (-0.3). Staff believes that 2009 is  
 2 an anomaly that is reflective of the severity in the economic downturn that was  
 3 most significantly during that year. To mitigate this effect, staff calculated the  
 4 CPI average since 2005 to 2011. The result was 2.4%, the same rate  
 5 authorized by the Commission in Order No. 09-020 in UE 197. Staff believes  
 6 this method is reasonable and in concept is consistent with the Commission  
 7 method in UE 197. It should be noted that the officers and union salaries were  
 8 not adjusted by this method.

9 **Q. PLEASE DESCRIBE IN DETAILS THE STEPS YOU FOLLOWED TO**  
 10 **CALCULATE STAFF PROPOSED WAGES AND SALARIES.**

11 A. First, I needed to calculate a ratio to distribute the test year's FTEs among the  
 12 classes. To do so, I calculated the average distribution ratio of the Company's  
 13 workforce from 2007 to 2011. This information was obtained from the  
 14 Company's work papers in PGE/500 and attachment DR-157-A, which is  
 15 included in Exhibit 202 of my testimony. Table 6 includes Staff's proposed test  
 16 year workforce distribution.

17 **Table 6 – Distribution of Test Year Workforce**

	<b>EXEMPT</b>	<b>HOURLY</b>	<b>OFFICER</b>	<b>UNION</b>	<b>Grand Total</b>
Sum of 2007 Act FTE	1,147	580	13	809	2,549
Sum of 2008 Act FTE	1,188	589	11	824	2,612
Sum of 2009 Act FTE	1,215	576	13	819	2,623
Sum of 2010 B FTE	1,256	587	12	848	2,703
Sum of 2011 B FTE	1,264	539	12	833	2,648
Total FTE by class	6,071	2,871	61	4,132	13,135
% distribution (average)	46.22%	21.86%	0.46%	31.46%	100%
TY 2011 FTE distribution	1,169	553	12	796	2,529

1 Next, I calculated a combined average salary per FTE for these two classes  
2 by dividing their combined 2009 market compensations by the sum of their  
3 FTEs during the same year (Table 7, column B). I then increased the 2009  
4 average salary by 2.4% annually through 2011 (Table 7, columns C & D).

5 The following step was to multiply the number of FTEs in the test year by the  
6 average test year salary to determine the wages and salaries of these two  
7 classes combined. Next, I added the union and officer salaries (Table 7,  
8 column F). Finally, I compared Staff calculations of the test year's wages and  
9 salaries with the Company's proposal. The result is a (\$7.1 million) reduction  
10 in test year's wages and salaries. These calculations are shown in Table 6  
11 below:

12 **Table 7 – Staff Adjustment to Test Year Wages and Salaries, \$000**

	<u>2009</u> <u>FTEs</u>	<u>2009 Market</u> <u>Compensation</u> <u>(\$000)</u>	<u>2010 at</u> <u>2.4%</u> <u>increase</u>	<u>2011 at</u> <u>2.4%</u> <u>increase</u>	<u>Test</u> <u>Year</u> <u>FTEs</u>	
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>
Exempt	1,215	103,276			1,169	
Non-exempt	576	25,925			553	
Total	1,791	129,201			1,722	
Average salary per FTE, \$000 <b>(total B/ total A)</b>		72.1	73.8	75.6		
Staff test year salaries, \$000 <b>(total E*D)</b>						130,231

13  
14 **Q. WHAT IS STAFF RECOMMENDATION WITH RESPECT TO OFFICERS**  
15 **SALARY?**

1 A. The company's salary level for officers in the base budget during 2011 is  
2 \$3,251,117. This is below PGE's 2009 market compensation for officers of  
3 \$3,300,000. Staff agrees with the company's proposed officers' salary level in  
4 the base budget for 2011.

5 **Q. HOW DID STAFF DETERMINE THE TEST YEAR'S SALARY FOR UNION**  
6 **EMPLOYEES?**

7 A. As shown in table 4 above, market compensation and the actual salaries for  
8 union employees during 2009 are the same. The test year's average salary  
9 per employee, was based on the 2009 average salary, and escalated by the  
10 appropriate rate increases according to the contracts between the labor union  
11 and the Company. A copy of the company's work paper is included in Exhibit  
12 202 of my testimony. The employee's test year average salary was multiplied  
13 by the allocated number of union employees in the test year as indicated in  
14 Table 2 above.

15 **Table 8 – Union wages and salaries**

	2009 average salary (DR157-A) <b>(A)</b>	Feb-10 <b>(B)</b>	Sep-10 <b>(C)</b>	Mar-11 <b>(D)</b>
1. Pay rate increase (DR-157E)		2%	2%	3.60%
2. Average salary	\$ 72,609	\$ 74,061	\$ 75,542	\$ 78,262
3. Union Test Year FTEs				796
4. Union Test Year wages and salaries, (column D, In.2*In.3)				\$62,296,552

1 **Q. PLEASE SUMMARIZE STAFF'S PROPOSED TEST YEAR WAGES AND**  
2 **SALARIES.**

3 A. Following is a summary of the Company's proposal vs. Staff proposal.

	<b>Company</b>	<b>Staff</b>	<b>Adjustment</b>
<i>Exempt and non-exempt</i>		\$130,231,100	
<i>Union</i>		\$62,296,552	
<i>Officers</i>		\$3,251,117	
<i>Total</i>	\$202,906,420	\$195,778,769	\$7,127,651

4

5 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

6 A. Yes, at this time.



**CERTIFICATE OF SERVICE**

**UE 215  
Corrected**

I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-13-0070, to the following parties or attorneys of parties.

Dated at Salem, Oregon, this 9th day of June, 2010.



---

Lois Meerdink  
Public Utility Commission  
Regulatory Operations  
550 Capitol St NE Ste 215  
Salem, Oregon 97301-2551  
Telephone: (503) 378-8959

UE 215  
Service List (Parties)

JOSEPH MACDONALD	15273 SE LA BONITA WAY OAKGROVE OR 97267
HEATHER RODE	21465 NW COFFEY LANE HILSBORO OR 97124 heatherode@gmail.com
<b>BOEHM KURTZ &amp; LOWRY</b>	
KURT J BOEHM ATTORNEY	36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com
<b>CITIZENS' UTILITY BOARD OF OREGON</b>	
GORDON FEIGNER (C) ENERGY ANALYST	610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 gordon@oregoncub.org
ROBERT JENKS (C) EXECUTIVE DIRECTOR	610 SW BROADWAY STE 308 PORTLAND OR 97205 bob@oregoncub.org
G. CATRIONA MCCRACKEN (C) LEGAL COUNSEL/STAFF ATTY	610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub.org
RAYMOND MYERS (C) ATTORNEY	610 SW BROADWAY - STE 308 PORTLAND OR 97205 ray@oregoncub.org
KEVIN ELLIOTT PARKS (C) STAFF ATTORNEY	610 SW BROADWAY STE 308 PORTLAND OR 97205 kevin@oregoncub.org
<b>CITY OF PORTLAND - CITY ATTORNEY'S OFFICE</b>	
BENJAMIN WALTERS (C) CHIEF DEPUTY CITY ATTORNEY	1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 ben.walters@portlandoregon.gov
<b>CITY OF PORTLAND - PLANNING &amp; SUSTAINABILITY</b>	
DAVID TOOZE SENIOR ENERGY SPECIALIST	1900 SW 4TH STE 7100 PORTLAND OR 97201 david.tooze@portlandoregon.gov
<b>DAVISON VAN CLEVE PC</b>	
S BRADLEY VAN CLEVE (C)	333 SW TAYLOR - STE 400 PORTLAND OR 97204 <a href="mailto:mail@dvclaw.com">mail@dvclaw.com</a>

<b>DEPARTMENT OF JUSTICE</b>	
STEPHANIE S ANDRUS (C) ASSISTANT ATTORNEY GENERAL	REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us
<b>ENERGY STRATEGIES LLC</b>	
KEVIN HIGGINS (C) PRINCIPLE	215 STATE ST - STE 200 SALT LAKE UT 84111-2322 khiggins@energystat.com
<b>FRED MEYER STORES/KROGER</b>	
NONA SOLTERO CORPORATE LAW DEPT #23C	3800 SE 22ND AVE PORTLAND OR 97202 nona.soltero@fredmeyer.com
<b>IBEW LOCAL 125</b>	
MARCY PUTMAN POLITICAL AFFAIRS & REPRESENTATIVE	17200 NE SACRAMENTO STREET PORTLAND OR 97230 marcy@ibew125.com
<b>NORTHWEST ECONOMIC RESEARCH INC</b>	
LON L PETERS (C)	607 SE MANCHESTER PLACE PORTLAND OR 97202 lon@nw-econ.com
<b>PACIFIC POWER &amp; LIGHT</b>	
JORDAN A WHITE SENIOR COUNSEL	1407 W. NORTH TEMPLE, STE 320 SALT LAKE CITY UT 84116 jordan.white@pacificcorp.com
<b>PACIFICORP, DBA PACIFIC POWER</b>	
OREGON DOCKETS	825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com
<b>PORTLAND GENERAL ELECTRIC</b>	
RANDALL DAHLGREN	121 SW SALMON ST - 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com
DOUGLAS C TINGEY (C)	121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com
<b>PUBLIC UTILITY COMMISSION</b>	
JUDY JOHNSON (C)	PO BOX 2148 SALEM OR 97308-2148 judy.johnson@state.or.us

<b>RFI CONSULTING INC</b>	
RANDALL J FALKENBERG (C)	PMB 362 8343 ROSWELL RD SANDY SPRINGS GA 30350 consultrfi@aol.com
<b>RICHARDSON &amp; O'LEARY</b>	
GREGORY M. ADAMS	PO BOX 7218 BOISE ID 83702 greg@richardsonandoleary.com
<b>RICHARDSON &amp; O'LEARY PLLC</b>	
PETER J RICHARDSON (C)	PO BOX 7218 BOISE ID 83707 peter@richardsonandoleary.com
<b>SEMPRA ENERGY SOLUTIONS LLC</b>	
GREG BASS	401 WEST A STREET SUITE 500 SAN DIEGO CA 92101 gbass@semprasolutions.com
<b>THE INTERNATIONAL DARK SKY ASSOCIATION</b>	
JAMES BENYA	3491 CASCADE TERRRACE WEST LINN OR 97068 jbenya@benyalighting.com
LEO SMITH	1060 MAPLETON AVE SUFFIELD CT 06078