

July 26, 2010

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission  
550 Capitol Street NE, Suite 215  
Salem, OR 97310-2551


Attn: Filing Center

RE: **Docket UE 216** – Joint Testimony in Support of Stipulation

Enclosed for filing by PacifiCorp d/b/a Pacific Power (the Company) is an original and five copies of the Joint Testimony in Support of the Stipulation. The Stipulation was filed on July 7, 2010, on behalf of the Company, Oregon Commission Staff, the Citizens' Utility Board, the Industrial Customers of Northwest Utilities and Sempra Energy Solutions LLC. In a June 29, 2010 letter to Judge Power, the Company indicated that the joint testimony would be filed separately from the Stipulation.

If you have any questions, please contact Joelle Steward, Regulatory Manager, at (503) 813-5542.

Very truly yours,

  
Andrea L. Kelly  
Vice President, Regulation

Enclosure

cc: UE 216 Service List

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 216

In The Matter:

PACIFICORP, dba PACIFIC POWER 2011  
Transition Adjustment Mechanism Schedule  
201, Cost-Based Supply Service

STAFF-PACIFICORP-CUB-ICNU-SEMPRA

JOINT TESTIMONY IN SUPPORT OF STIPULATION

WITNESSES: KELCEY BROWN, GREGORY N. DUVALL, GORDON FEIGHNER,  
RANDALL J. FALKENBERG, AND KEVIN C. HIGGINS

July 2010

1   **Q.     Who is sponsoring this testimony?**

2   A.     This testimony is jointly sponsored by Staff of the Public Utility Commission of  
3           Oregon (Staff), PacifiCorp (or the Company), the Citizens' Utility Board of  
4           Oregon (CUB), the Industrial Customers of Northwest Utilities (ICNU), and  
5           Sempra Energy Solutions LLC (Sempra). In this Joint Testimony, the parties are  
6           referred to collectively as the "Parties."

7   **Q.     Please state your names.**

8   A.     Kelcey Brown, Gregory N. Duvall, Gordon Feighner, Randall J. Falkenberg and  
9           Kevin Higgins. Ms. Brown's qualifications are set forth in Exhibit Staff/101,  
10          Brown/1; Mr. Duvall's qualifications are set forth in PPL (TAM)/100, Duvall/1;  
11          Mr. Feighner's qualifications are set forth in CUB Exhibit/101; Mr. Falkenberg's  
12          qualifications are set forth in Exhibit ICNU/101; and Mr. Higgins' qualifications  
13          are set forth in SES/100.

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

15   A.     This Joint Testimony describes and supports the stipulation filed in this  
16          proceeding on July 7, 2010 (Stipulation), between Staff, CUB, ICNU, Sempra,  
17          and PacifiCorp (referred to hereinafter jointly as the "Parties" and individually as  
18          a "Party).

19   **Q.     Does the Stipulation resolve all contested issues in this proceeding that were**  
20          **raised prior to the Company's rebuttal update?**

21   A.     Yes. The Stipulation is a comprehensive settlement of all issues in the  
22          Company's 2011 Transition Adjustment Mechanism (TAM) filing prior to the  
23          July 7, 2010 Rebuttal Update. The purpose of the TAM filing is to update net

1 power costs (NPC) for 2011 and to set transition adjustments for Oregon  
2 customers who choose direct access in the November 2010 open enrollment  
3 window.

4 In addition to resolving certain issues in the 2011 TAM, the Stipulation  
5 includes provisions that: (1) set forth methodology changes that the Company will  
6 make in the 2012 TAM; (2) establish new procedures relating to the Indicative  
7 Filing and Final Update; (3) resolve issues related to forecast changes in Other  
8 Revenue for items that have a direct relation to NPC; (4) state that the Company  
9 will make certain filings with the Federal Energy Regulatory Commission  
10 (FERC); (5) state that the Commission's final decision in Docket UM 1355 will  
11 be reflected in the 2011 TAM if the decision is timely and issued before the  
12 Indicative Filing; (6) resolve ICNU's deferred accounting application in Docket  
13 UM 1465; (7) provide for a transmission-related credit to be included in the  
14 Schedule 294 transition adjustment for the 2011 TAM for Schedule 747 and 748;  
15 (8) resolve issues related to billing information and bill inquiries from direct  
16 access customers, and (9) commit the Parties to work collaboratively to consider a  
17 change in the TAM schedule for the annual filing.

18 **Q. Have all Parties to the proceeding signed on to the Stipulation?**

19 A. Yes.

20 **Stipulated 2011 NPC Revenue Increase**

21 **Q. What was the Company's proposed increase to NPC revenues prior to this**  
22 **settlement?**

23 A. The Company's February 26, 2010 TAM filing reflected an increase of

1 approximately \$69.2 million over the \$256.1 million Oregon-allocated NPC  
2 baseline set in UE 207, adjusted for the loss of retail load.

3 **Q. What do the Parties agree with respect to the Company's proposed 2011**  
4 **TAM NPC revenue increase?**

5 A. The Parties agree to reduce PacifiCorp's Oregon-allocated NPC by \$11.0 million,  
6 as shown in Exhibit A to the Stipulation. This will result in an increase of  
7 \$58.2 million to Oregon-allocated NPC, including the load change adjustment,  
8 based on the Company's initial filing. This increase results in 2011 NPC of  
9 approximately \$1.233 billion on a total-Company basis, and \$301.8 million on an  
10 Oregon-allocated basis, subject to updates described below.

11 **Q. Does the stipulated reduction of \$11.0 million resolve all issues raised by**  
12 **Parties as of the date of the Stipulation?**

13 A. Yes. The Parties agreed that the \$11.0 million reduction resolves all issues  
14 related to NPC as of the date of the Company's July 7, 2010 update, which was  
15 filed on the same date as the Stipulation. Specifically, the Stipulation reflects the  
16 issues raised in the testimony of Staff, ICNU, CUB, and Sempra; changes in NPC  
17 resulting from items specified in the Company's April 21, 2010 filing of  
18 corrections to and omissions from the Initial Filing; and certain other specific  
19 corrections in addition to those specified in the April 21, 2010 filing.

20 **Q. Will the stipulated NPC be subject to the updates scheduled to be filed in this**  
21 **proceeding on November 8, 2010 and November 15, 2010?**

22 A. Yes. As described in the TAM Guidelines, in addition to its Rebuttal Filing on  
23 July 7, 2010 that was filed on the same day as the Stipulation, the stipulated NPC

1 will be updated in its Indicative Filing on November 8, 2010, and the Final  
2 Update on November 15, 2010 (collectively the Updates). The Parties agree that  
3 the Updates may increase or decrease the Oregon-allocated increase of  
4 \$58.2 million from base NPC.

5 **Q. Can Staff and intervenors challenge these Updates?**

6 A. Yes. The Stipulation retains Staff's and intervenors' ability to challenge the  
7 Updates for new NPC elements (e.g., new or updated contracts), including those  
8 in the July 7, 2010 update. However, the Parties agree to not make additional  
9 error corrections or other changes relevant to the Company's filings made prior to  
10 the date of the Rebuttal Update. For example, no Party can identify new errors in  
11 data inputs that were included in PacifiCorp's original filing. All parties have  
12 agreed to accept the risk that there may be unidentified errors in the Company's  
13 original filing.

14 **Q. What is the Parties' agreement for rate spread and rate design?**

15 A. Rate spread is consistent with the TAM Guidelines and the stipulation adopted by  
16 the Commission in Docket UE 199. The proposed Schedule 201 revenues by rate  
17 schedule were determined by spreading the total forecast net power costs for the  
18 test year to the rate schedules in the same manner as the revenues for Schedule  
19 200 were spread to the rate schedules in the Company's current general rate case,  
20 Docket UE 217. The rate spread agreed to by the Parties is set forth in Exhibit C  
21 to the Stipulation. For rate design, the Parties agreed that the Company will  
22 revise Schedule 4 rates in Schedule 201 to reflect the rate design agreed to by the

1 parties in Docket UE 217. The stipulation resolving all issues in that docket was  
2 filed on July 12, 2010.

3 **Q. How will PacifiCorp implement the rates resulting from the Stipulation?**

4 A. Upon approval of this Stipulation and concurrent with the filing of the Final  
5 Update, PacifiCorp will file revised Schedule 201 rates and revised transition  
6 adjustment Schedules 294 and 295 as part of a compliance filing in Docket UE  
7 216, to be effective January 1, 2011, reflecting rates as agreed in the Stipulation.

8 **Procedures Related to the Indicative Filing and Final Updates**

9 **Q. Please describe the provisions in the Stipulation governing procedures**  
10 **related to the Indicative Filing and Final Update.**

11 A. Paragraphs 13 and 14 of the Stipulation provide procedural requirements related  
12 to the Indicative Filing and Final Updates in this case and future TAM  
13 proceedings. First, the Company agrees to file an attestation with the Indicative  
14 Filing in this case and in future TAM filings confirming that all contracts  
15 executed prior to the contract lockdown date have been included in the Indicative  
16 Filing. The attestation will also identify any exceptions and the reason why the  
17 Company excluded such contracts.

18 Second, the Stipulation sets forth procedures that will apply to challenges  
19 to the Company's Final Updates and compliance filing. These procedures will  
20 apply to this case and to the 2012 TAM filing. During the 2013 TAM filing, the  
21 Parties will review the effectiveness of the procedures.

1   **Q.     Please describe the procedures set forth in the Stipulation governing**  
2       **challenges to the Company's Final Updates and compliance filings.**

3   A.     The Stipulation provides that Staff and intervenors retain their procedural rights to  
4       raise any issue regarding the Company's Final Updates to the Commission prior  
5       to and during the Commission public meeting. The Parties have not reached any  
6       agreement on the appropriateness of a deferral filed after the Commission public  
7       meeting. Staff's and intervenors' procedural rights include filing for a deferral of  
8       costs related to the final TAM updates or requesting that a portion of the TAM be  
9       allowed subject to refund. To facilitate review of the Final Updates, PacifiCorp  
10      agrees to make a good faith effort to respond to all discovery requests after the  
11      Indicative Filing in five business days. If a Party has a concern with the  
12      Company's Final Update, it will provide notice of such concern to the Parties at  
13      least 10 business days before the Commission public meeting scheduled  
14      immediately prior to the effective date of the compliance filing. The notice will  
15      identify the specific elements of the Updates that are relevant to the potential  
16      challenge and provide an explanation of the Party's concern.

17           The Company will provide an initial response to the Parties regarding their  
18      concerns no more than five business days after receiving the notice. The Parties  
19      will work to reach resolution of the issue.

20           If the Parties cannot resolve the matter before the Commission public  
21      meeting, the Parties may make recommendations to the Commission at the public  
22      meeting to set a process to resolve the matter, if additional process is required.

23      The recommendations may include that a specific amount of the tariff change will



1 be subject to deferral until the Commission resolves the matter. For any  
2 additional process after the Commission public meeting, the Parties agree to  
3 request a schedule that will result in a Commission decision within 90 days of the  
4 effective date for new rates.

5 **Q. Does the Stipulation specify whether PacifiCorp may oppose the filing of**  
6 **such a deferral?**

7 A. Yes. The Stipulation provides that PacifiCorp will not oppose the filing of a  
8 deferral of any limited and specific cost that is identified by the Parties at least  
9 10 business days before the Commission public meeting. In particular, the  
10 Company will not challenge the deferral on the basis that it fails to meet the  
11 Commission's standards for deferred accounting as initially set forth in Order No.  
12 05-1070 (Docket UM 1147), including issues related to the materiality of the  
13 filing and a showing of substantial harm. PacifiCorp otherwise retains the right to  
14 object.

15 **Q. How does the Stipulation propose that a Commission decision resulting in**  
16 **changes to the transition adjustments be handled?**

17 A. The Stipulation specifies that if a final Commission decision on any challenges to  
18 the Final Update results in changes to the transition adjustments approved in  
19 Schedules 294 and 295, the Company may reflect in the direct access balancing  
20 account any difference between the approved transition adjustments and the  
21 transition adjustments that would have been in effect consistent with the  
22 Commission's decision on the challenged items. Language in Schedules 294 and  
23 295 will be revised in the Company's compliance filing to reflect this change.

1   **Methodology Changes in the 2012 TAM**

2   **Q.     Does the Stipulation include terms related to the methodology the Company**  
3       **will use in the 2012 TAM?**

4   A.     Yes. Although the Parties specified that the stipulated \$11 million reduction to  
5       the Oregon-allocated baseline NPC does not imply the Parties' agreement on the  
6       merits of any adjustment or the Company's NPC study, Paragraph 8 of the  
7       Stipulation identifies methodological changes that the Company agrees to reflect  
8       in the 2012 TAM. The Company will provide Parties with the details of these  
9       changes by mid-January 2011 and will meet with Parties to discuss the changes if  
10      requested. Staff and intervenors reserve the right to review, challenge, and  
11      propose alternatives to these methodological changes.

12   **Q.     What are the methodological changes that will be incorporated in the 2012**  
13       **TAM?**

14   A.     The Company agreed to revise its daily screening methodology, use a four-year  
15       average for the costs of purchased power from the Black Hills combustion  
16       turbines, rely on the traditional analysis of four years of actual data to derive heat  
17       rate inputs without adjustments for scrubbers or other capital projects, model the  
18       purchased power from the Arizona Public Service under the supplemental  
19       contract for coal and other generation to be exercised only when economic, not  
20       include inter-hour wind integration charges for non-owned wind facilities, and  
21       include modeling of non-firm transmission links and costs and capacity using a  
22       four-year average.

1   **Q.     Will the Company include these methodological changes in TAM filings after**  
2       **the 2012 TAM?**

3   A.     Yes, unless the Company identifies a change in facts or circumstances.

4   **Other Revenue**

5   **Q.     Does the Stipulation include a provision relating to accounting for changes in**  
6       **Other Revenue in the TAM?**

7   A.     Yes. The Stipulation provides that in future stand-alone TAM filings, the  
8       Company will reflect forecast changes in Other Revenue for items that have a  
9       direct relation to NPC, for which a revenue baseline has been established in rates  
10      in Docket UE 217.

11   **Q.     Does the Stipulation establish revenue baselines for certain Other Revenue**  
12      **items?**

13   A.     Yes. Exhibit B contains the revenue baselines from Docket UE 217 for the storage  
14      and exchange agreements for Seattle City Light Stateline and the non-Company  
15      owned Foote Creek projects, revenues from the Bonneville Power Administration  
16      associated with the South Idaho Exchange, steam revenues for Little Mountain  
17      and royalty offset revenues for the Georgia Pacific Camas contract.

18   **FERC Filings**

19   **Q.     How does the Stipulation resolve the issue of wind integration services to**  
20      **non-owned facilities not being reflected in the Company's Open Access**  
21      **Transmission Tariff approved by FERC?**

22   A.     In the Company's next rate case filing with FERC, the Company agrees to file to  
23      modify the Company's Open Access Transmission Tariff to include charges for

1 wind integration services to non-owned wind facilities. The Company's next  
2 FERC rate case is scheduled to be filed in June 2011.

3 **Q. Does the Stipulation contain any other provisions relating to the Company's**  
4 **next FERC rate case filing?**

5 A. Yes. The Company has agreed to update line loss charges in its next FERC rate  
6 case.

7 **Q. Does this prevent parties from raising these issues in their testimony in next**  
8 **year's TAM?**

9 A. No. In addition, the Parties do not have to support PacifiCorp's FERC filing, and  
10 can propose alternative treatments of wind integration service to non-owned  
11 facilities and line loss charges in future TAMs and/or FERC filings.

12 **Docket UM 1355 – Investigation in Forced Outage Rates**

13 **Q. How do the Parties propose treating the Commission's decision in Docket**  
14 **UM 1355 in the Company's 2011 TAM?**

15 A. The Stipulation provides that if the Commission's decision in that proceeding is  
16 timely and issued prior to the Indicative Filing, the Company agrees to reflect the  
17 final Commission decision in the 2011 TAM. PacifiCorp will implement the final  
18 Commission decision in UM 1355, even if a party in UM 1355 seeks rehearing,  
19 reconsideration or appeal of the Commission decision. The Parties clarified that  
20 the provision relating to UM 1355 does not expressly or impliedly waive  
21 PacifiCorp's rights, including but not limited to the right to seek clarification or  
22 challenge the UM 1355 decision or to seek to have the impact of the decision  
23 made subject to refund or deferral.

1   **Docket UM 1465 – ICNU’s Application for Deferral Accounting for 2010 TAM**

2   **Q.     Please provide a short summary of the issues raised in Docket UM 1465.**

3   A.     In UM 1465, ICNU filed an Application for Deferred Accounting requesting that  
4           the Commission require PacifiCorp to defer certain power costs, benefits, and  
5           revenues associated with certain contracts associated with the 2010 TAM, UE  
6           207. ICNU objected to the Company’s treatment of the relevant contracts in the  
7           Final Update in that case.

8   **Q.     Does the Stipulation resolve Docket UM 1465?**

9   A.     Yes. ICNU agrees to dismiss and not refile its deferred accounting application in  
10          that docket. This withdrawal is based upon the Company’s ability under UP 260  
11          to sell Oregon-allocated renewable energy credits (RECs) ineligible under  
12          Oregon’s renewable portfolio standard that are generated in 2010 under the terms  
13          of the NV Energy contract and the LADWP contract, with net proceeds to be  
14          credited to the property sales balancing account. Although PacifiCorp  
15          temporarily suspended sales of Oregon-allocated RECs under these two contracts  
16          upon receipt of the Commission’s order in UE 210, the terms and conditions of  
17          the contracts allow PacifiCorp the flexibility to ensure that Oregon customers will  
18          receive a full allocation (using the System Generation or SG factor) of the  
19          revenues received from these contracts in 2010.

20   **Schedules 294 and 295 Transition Adjustment**

21   **Q.     What did the Parties agree in regards to the calculation of the transition**  
22          **adjustments in Schedules 294 and 295 for direct access?**

23   A.     PacifiCorp agrees to increase the Schedule 294 transition adjustment by

1       \$(0.50)/MWh for the 2011 TAM for Schedule 747 and 748 customers. This  
2       increase reflects the potential value associated with reselling Bonneville Power  
3       Administration (BPA) Point to Point (PTP) wheeling rights from Mid-C to the  
4       Company's Oregon Service territory that are freed-up as a result of customers  
5       choosing direct access.

6       **Q.     What else did the Stipulation provide with respect to BPA PTP wheeling**  
7       **rights?**

8       A.     PacifiCorp also agrees to meet with an Energy Service Supplier (ESS) upon  
9       request in advance of the November 2010 shopping window to discuss price,  
10      terms and potential quantities of BPA PTP wheeling rights to be purchased from  
11      PacifiCorp for delivery from all points of receipt considered to be Mid-C to the  
12      Company's Oregon service territory to serve direct access load. The Stipulation  
13      provides that PacifiCorp will evaluate this issue using the actual direct access  
14      customer data that results from the November 2010 shopping window, report its  
15      findings back to the parties, and use any knowledge gained to guide its filing of  
16      the 2012 TAM.

17      **Q.     Does the Stipulation require PacifiCorp to sell transmission rights to an**  
18      **ESS?**

19      A.     No. The Stipulation states that PacifiCorp is not obligated to sell any  
20      transmission rights to an ESS.

1   **Direct Access Billing Issues**

2   **Q.     Please explain the provisions in the Stipulation related to billing of potential**  
3       **direct access customers.**

4   A.     The Stipulation states that PacifiCorp will continue to respond as appropriate to  
5       individual bill inquiries by direct access customers. If a participating direct  
6       access customer requests additional information on an on-going basis, the  
7       Company will endeavor to provide such information as practicable, consistent  
8       with Schedule 300, Rule 11-2. Schedule 300, Rule 11-2 provides that the  
9       Company may charge the actual costs of work to be performed at a customer's  
10      request. The Stipulation clarifies that this provision does not prejudice the  
11      appropriateness of application of Schedule 300, Rule 11-2 in these circumstances.  
12      For example, there may be disagreement among the Parties about whether  
13      Schedule 300, Rule 11-2 should apply to additional information that may be  
14      provided to direct access customers.

15   **Q.     What other billing issues does the Stipulation address?**

16   A.     In addition to the provisions related to individual bill inquiries, the Stipulation  
17      provides that prior to the November 2010 shopping window, PacifiCorp will work  
18      with interested Parties to identify the billing information that PacifiCorp's  
19      Customer Service System billing system can provide on a routine basis to direct  
20      access customers sufficient to allow such customers to reconcile their bills to the  
21      PacifiCorp tariff. If the Parties cannot resolve this issue by the start of the 2011  
22      shopping window, the Parties agree to support establishing a collaborative process  
23      to address this issue.

**Future TAM Filing Schedule**

**Q. Please explain the provision in the Stipulation regarding the schedule for future TAM filings.**

A. The Parties agree to work together to develop a proposal by fall of 2010 to consider a change to PacifiCorp's TAM schedule from an annual filing with a rate effective date of January 1 to an annual filing with a rate effective date of July 1. The Parties agree to work in good faith to reach agreement in a timeframe that will avoid the Company filing on March 1, 2011 for the next TAM and general rate case. The proposal will consider mechanisms to mitigate financial impacts to PacifiCorp due to a potential six-month delay during the transition period.

**Commission Rejection or Modification of the Stipulation**

**Q. If the Commission rejects any material part of the Stipulation, are the Parties entitled to reconsider their participation in the Stipulation?**

A. Yes. The Stipulation provides that if the Commission rejects all or any material portion of this Stipulation or imposes additional material conditions in approving this Stipulation, any Party shall have the rights provided in OAR 860-014-0085, including the right to withdraw from the Stipulation, and shall be entitled to seek reconsideration or appeal of the Commission's Order.

**Reasonableness of the Stipulation**

**Q. Have the Parties evaluated the overall fairness of the Stipulation?**

A. Yes. Each Party has reviewed the calculation of the 2011 NPC revenue increase and the rates resulting from this increase. The Parties agree that the rates that would result from the issues resolved in this Stipulation would be fair, just, and



1 reasonable based on their respective case positions, the positions of other Parties,  
2 and the discovery produced in this proceeding by the Company. Because the July  
3 update has not been reviewed, the final updates have not been filed and the final  
4 TAM rates are unknown, the parties have not yet reached agreement that the final  
5 TAM rates will be fair, just and reasonable. The Parties also agree that the results  
6 of the other issues resolved in the Stipulation are fair and reasonable and should  
7 be adopted.

8 **Q. What do the Parties recommend regarding the Stipulation?**

9 A. The Parties recommend that the Commission adopt the Stipulation as the basis for  
10 resolving issues in this proceeding and include the terms and conditions of the  
11 Stipulation in its order in this case.

12 **Q. Does this conclude your Joint Testimony?**

13 A. Yes.

## CERTIFICATE OF SERVICE

I hereby certify that on this 26<sup>th</sup> of July, 2010, I caused to be served, via E-Mail and overnight delivery (to those parties who have not waived paper service), a true and correct copy of the foregoing document on the following named person(s) at his or her last-known address(es) indicated below.

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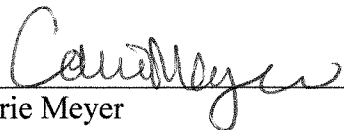
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