BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 227

In the Matter of	)
PACIFICORP, dba PACIFIC POWER	)
2012 Transition Adjustment Mechanism	)

OPENING TESTIMONY OF THE

CITIZENS' UTILITY BOARD OF OREGON

June 24, 2011

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In the Matter of PACIFICORP, dba PACIFIC POWER 2012 Transition Adjustment Mechanism	OPENING TESTIMONY OF THE CITIZENS' UTILITY BOARD OF OREGON

Our names are Bob Jenks and Gordon Feighner, and our qualifications are listed in CUB Exhibit 101.

I. Introduction

PacifiCorp's 2012 TAM filing projects a 4.5% increase for residential customers. CUB is concerned about the effect of this rate hike on customers' bills. If this filing is approved, PacifiCorp's residential rates will be 59% higher than before the MEHC merger.

CUB believes PacifiCorp's filing should be adjusted in several areas. First, PacifiCorp (also, "the Company") has not demonstrated that its wind integration study is a reasonable forecast of wind integration costs. CUB recommends that the Commission find that its wind integration costs must be repriced using the BPA wind integration rate.

Second, CUB believes that the Company's rates should be adjusted to pass through to customers an expected level of liquidated damages associated with forced outage rates. Thus, CUB recommends that the Commission find that PacifiCorp's forecasted net power costs should be reduced by $[redacted] (Oregon basis) to reflect the average amount of liquidated damages that the Company will likely see associated with forced outages.

And third, given that PacifiCorp's natural gas hedging strategy hedges too much of its gas volume, and hedges those volumes too early, CUB recommends that the Commission find that PacifiCorp's natural gas hedging strategy is imprudent and require the Company to remove all hedges that were made more than 3 years before gas delivery. The gas supply should then be priced at the forward price curve for gas in the November update.

II. PacifiCorp's Rates Are Becoming Unaffordable

A. MEHC was Supposed to Control Costs

One of CUB's overriding concerns regarding this docket is the speed at which PacifiCorp's rates are quickly becoming unaffordable. MidAmerican Energy Holdings Company (MEHC) made bold promises when it purchased PacifiCorp six years ago, claiming that it could invest huge sums of money into an expansion of rate base without causing rates to increase significantly. MEHC predicted that rates would increase by less than the 4% annual rate that was forecast under ScottishPower:

Mr. Jenks claims that MEHC hasn't analyzed the effect of its plans on customer rates and has generally not addressed the issue of rates. Mr. Jenks provides an excerpt of an exhibit that he claims

demonstrates this lack of attention to the impact on rates. How do you respond?

A. Prior to the filing of the Joint Application, MEHC performed a high-level estimate of changes to overall revenue requirements to ensure there would not be a negative impact on rates. This was the basis for the statement in my revised direct testimony at pages 28, line 23, "We do not expect that the commitments we are offering will cause an increase in the percentage discussed in PacifiCorp witness Johansen's testimony." In response to issues raised by Mr. Jenks and others in their testimony, MEHC has continued to refine that analysis, the results of which are included in Exhibit PPL/313.

Q. Please describe Exhibit PPL/313.

A. This exhibit demonstrates that the implementation of MEHC's commitments will result in an overall reduction in PacifiCorp's projected revenue requirement of approximately $201 million on a net present value basis, measured over the period of 2006-2015. These savings, which are MEHC's best current estimate, are presented both in annual form and as a net present value and are derived by comparison to the confidential PacifiCorp business plan ScottishPower provided to MEHC in due diligence.[1]

Both CUB witness Jenks and CADO-OECA witness Abrahamson express apprehension about the impact of MEHC's investment commitments on rates, implying an ominous lack of concern on MEHC's part regarding customer rate levels. Mr. Abrahamson at page 9, lines 12-14, also attributes PacifiCorp's planned average 4% annual rate increases to MEHC's investment commitments. Please explain.

We understand customers' concerns about incremental rate increases and prepared Exhibit PPL/313 to address and dispel these concerns. In this regard, it is important to clarify that the average annual 4% rate increase mentioned by Mr. Abrahamson is not the result of MEHC commitments but instead reflects PacifiCorp's preexisting need for annual rate increases averaging around 4% total company over ten years based, regardless of whether this transaction is approved. As witness Johansen testifies, these projected increases, which are based upon then-current market prices, are part of the plan by ScottishPower and PacifiCorp to enable PacifiCorp to meet its capital investments needs and earn its authorized return. The investments proposed by MEHC are not projected to increase the net revenue requirements of PacifiCorp;

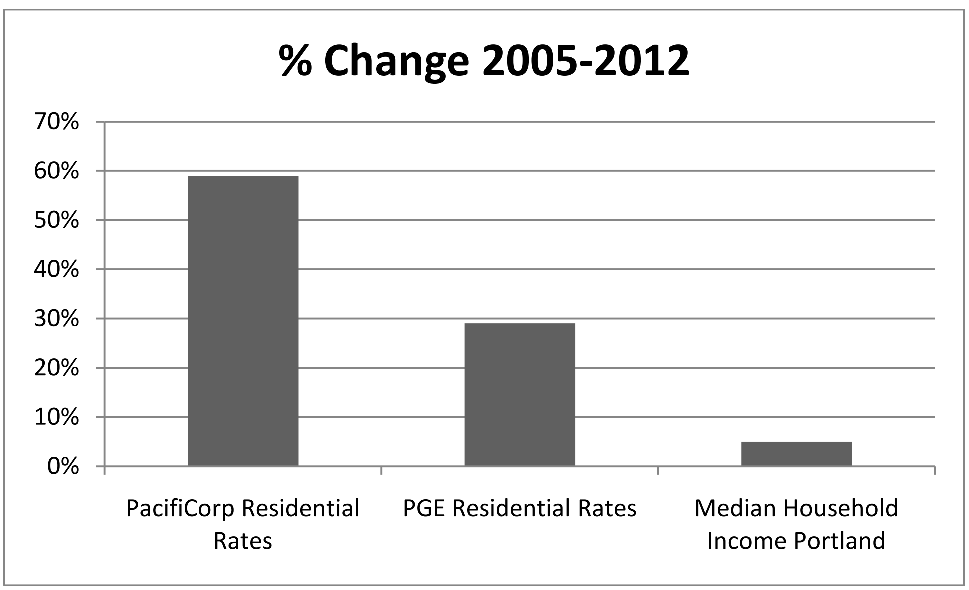
[1] UM 1209 / PPL / 312 / Gale / 2.

> rather, as indicated by Exhibit PPL/313, MEHC's investments are projected to reduce net revenue requirements over time.[2]

MEHC made these claims in 2005. At that time the average Oregon residential customer of PacifiCorp was paying 6.31 cents/kWh.[3] If the rate increase proposed in this docket is approved, rates will be more than 10 cents/kWh in January. This constitutes an increase of 59% since 2005.[4]

B. PacifiCorp's Rates Are Increasingly Unaffordable

The following chart compares the increase in residential rates PGE's residential rate increase and the increase in Portland's median household income.[5] This shows that PacifiCorp's rates are increasing much faster than PGE's and that income levels are not coming close to keeping up with either increase. This chart indicates that there is a very real and growing problem with the affordability of PacifiCorp's residential rates.



[2] UM 1209 / PPL / 312 / Gale / 6.
[3] 2009 Oregon Utility Statistics, OPUC, page 7.
[4] CUB Exhibit 102.
[5] Median Household Income data is from Portland Development Commission based on increases from 2005 to 2010 and assumes little or no increase from 2010 to 1/1/2012.

C. PacifiCorp Is Not Doing Enough to Control Costs

Obviously, massive capital investment is not a direct element of the TAM. But under MEHC's ownership, the TAM has always increased.[6] While the new investments in wind should reduce fuel costs and put downward pressure on net power costs, that investment has not led to lower net power costs. Instead, power costs have gone up with wind investment. Power costs have also gone up with increased economic activity and, conversely, have gone up with decreased economic activity. Power costs have gone up when natural gas prices have risen and have also gone up when natural gas prices have fallen. In short, power costs go up. . . period.

PacifiCorp will argue that its actual power costs are going up and that the costs in the TAM simply reflect this. CUB does not deny this. But CUB does raise the question of “why?”.

Begin Confidential Material

CUB has taken a close look at PacifiCorp’s net power costs and has come up with some theories related to them. First, it seems as though the focus within the Company is not on keeping these costs down. CUB was able to identify one official, [redacted], who had an explicit goal related to keeping net power costs down:

> [redacted][7]

End Confidential Material

Nevertheless, coal costs have increased significantly in this case:

> NPC are higher due to increases in the costs of third-party coal supply and transportation agreements, and cost increases at the Company’s

[6] The 2006 TAM (1/1/2006) did reduce rates by less than 1%, but this rate proceeding was conducted in 2005 under ScottishPower ownership.
[7] CUB CONFIDENTIAL Exhibit 103 (ICNU DR 1.6, Attachment 2).

> captive mines. Approximately 1.4 of the NPC increase in this case is attributable to coal costs.[8]

It is doubtful that Ms. Crane achieved her target for the delivered cost of coal. PacifiCorp provides its coal costs in $/ton, rather than $/mmBTU. However, if we use the average cost of coal in her testimony and assume that the average BTU content is 8400/lb, we find that Ms. Crane did not achieve her goal.

Beyond this one individual goal, it is not clear where minimizing net power costs fits into the Company's list of priorities. This may be a reflection that the priority for PacifiCorp is really on capital investment. It may also reflect the fact that mechanisms like the TAM protect the Company from increases in net power costs, so there simply is little reason for the Company to make a strong effort to control costs. Between financial hedges and physical contracts, PacifiCorp can lock in its fuel costs before the final TAM update. While the Company retains some operational risk associated with plant performance, it bears little risk associated with fuel and power prices. One indication of this is the level of hedging that is encouraged by PacifiCorp's management. Customers pay for the cost of hedges, which protect the Company from the variability of fuel prices. As we will show in this testimony, there is evidence that the Company is hedging natural gas purchases at an imprudent level.

III. CUB's Recommendations

CUB has reviewed PacifiCorp's filing and is compelled to make recommendations to the Commission on several issues, including wind integration costs, hedging strategies, and settlements of liquidated damages.

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[8] UE 227 / PPL / 100 / Duvall / 6.

A. Wind Integration Costs

CUB continues to be concerned about PacifiCorp's wind integration costs. PacifiCorp's wind integration studies cannot be verified. While PacifiCorp points to its wind integration study to forecast tens of millions of dollars in costs for wind integration, the Company claims that it cannot identify the actual costs once a test year has been completed. CUB notes here, as we did in last year's TAM proceeding (UE 216), that the best way to verify a forecasted cost is to compare it to the actual costs.

> Further refinement is needed for the methodology used by PacifiCorp to determine its systemwide wind integration costs on its own system. There will be issues with any forward-looking estimate of wind integration costs, as it is very difficult to separate the costs that are strictly dedicated to wind integration from those that are otherwise necessary to balance the general system load. The burden of proof is on PacifiCorp to show that all of the costs associated with wind integration are properly accounted for and are not duplicated elsewhere in the system. It may be that the only reliable and fair way to assess the Company's wind integration costs is by using a backward-looking methodology that calculates the actual costs at year end and uses this to forecast future rates. CUB encourages PacifiCorp to develop a more reliable forward-looking methodology or to consider using verified historic costs as the basis for the charge.[9]

PacifiCorp claims that in the case of wind integration, no actual costs can be identified. If this is indeed true, a forecast of costs associated with wind integration will not be provable. Indeed, the burden is on the Company to demonstrate the firm costs associated with wind integration if it wants to pass these costs on to customers.

i. Stakeholders Are Not Satisfied with PacifiCorp's New Study

The PUC rejected PacifiCorp's last wind integration study and advised the Company to, by "August 2, 2010, complete a wind integration study that has been vetted by stakeholders through a public participation process."

[9] UE 216 / CUB / 100 / Feighner / 3.

CUB's conversations with other stakeholders involved in PacifiCorp's recent wind integration study have indicated that a number of parties are not satisfied with the methodology and calculations used in the study. The Renewable Northwest Project (RNP), which was represented in the stakeholder group that participated in the collaborative design of the study, does not believe that its issues and concerns were given adequate consideration in the final study design.[10]

Testimony from intervenors in other states indicates similar dissatisfaction throughout PacifiCorp's service territory. In testimony submitted on behalf of intervenors in Utah and Wyoming, Mr. Randall Falkenberg states, regarding the study and its design process:

> No. The Company has not proven that its test year wind integration costs relate in any way to its actual wind integration costs. Rather, the Company has included approximately $41 million in wind integration costs in the test year based on the results of its 2010 Wind Integration Study. However, that study should be rejected in its entirety for three reasons. First, the study suffers from numerous design flaws. Second, while the Company implies the study design was the result of a "collaborative process," it didn't incorporate the advice of the various participating experts and other parties, resulting in substantial bias in the final results. This is discussed in depth in Exhibit OCS 4.3. Third, the study contains numerous implementation errors including use of unreliable data, incorrect regression models, math errors, and double counting of several wind farms.[11]

While PacifiCorp did have a "public process," CUB is unable to identify any parties that are satisfied that their concerns have been addressed in this process. This leaves the TAM proceeding on the familiar ground of having a disputed wind integration study that has not been acknowledged in the IRP.

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[10] Based on representations RNP staff have made to CUB staff.
[11] Utah 10-035-124 / OCS 4D Falkenberg / Page 10.

ii. PacifiCorp Should Use BPA's Wind Integration Cost Figures

CUB has previously argued that PacifiCorp should continue to use its older wind integration cost figures until the new wind integration study is vetted by stakeholders and approved by the Commission. As the new PacifiCorp wind integration study has not yet been approved, and is the subject of conflict, CUB now suggests that PacifiCorp either use the figures from the old wind integration study or adopt the firm wind integration costs used by BPA as a proxy for all of its wind integration costs, both internal and market-based.

The annual conflict over PacifiCorp's methodology in calculating wind integration costs is becoming tiresome for all parties involved. PacifiCorp has too many opportunities to manipulate a self-conducted study in its own favor as a way to justify higher rates. Furthermore, the forward-looking nature of the study makes it impossible to verify its cost assessments, a shortcoming that is acknowledged by the Company. The time has come to establish a wind integration rate that is not determined internally by PacifiCorp and has some independent basis. To this end, CUB recommends that the Commission require PacifiCorp to price its wind integration rate at the same level as BPA prices its wind integration rate, which is provisionally set for 2012 at $1.32/kW-month[12], or $5.83/MWh.

B. Liquidated Damages

For the period from 2007 to 2010 PacifiCorp has received a number of settlements for liquidated damages from subcontractors and other parties related to unanticipated forced outages at generation plants. These settlements for liquidated

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[12] "2012 BPA Initial Rate Proposal," page 12. November 2010. http://www.bpa.gov/corporate/ratecase/2012/docs/Transmission%20Rate%20Schedules.pdf.

damages are not, to CUB's knowledge, subtracted from the Company's calculation of forced outage rates (FOR) for the plants at which the outages occurred, even though the Company benefits financially from both the liquidated damages settlements and the increased outage rate at the plants in question.

BEGIN CONFIDENTIAL

PacifiCorp's Confidential attachment to its response to ICNU DR 1.4[13] includes a list of all settlements for liquidated damages received by PacifiCorp since 2007. The total of these settlements for liquidated damages is $[redacted], meaning that the Company's average annual liquidated damages settlement amount over the past four years has been $[redacted]. CUB recommends that the Commission require PacifiCorp to factor in an adjustment to forced outage rate calculations in future years that incorporates a four-year rolling average of the Company's settlements for liquidated damages. Using an Oregon basis of 25.62%, this would be an adjustment of $[redacted] for the current period.

END CONFIDENTIAL

C. Excessive Natural Gas Hedging

CUB is concerned by PacifiCorp's level of natural gas hedging, especially the amount of longer-term (greater than 36 months) hedges. CUB focused a great deal of resources on NW Natural's gas hedging recently in the UM 1520 docket, and has concerns about a utility hedging a significant portion of its gas supply through conventional hedges that are greater than 3 years (36 months). There are real questions about the liquidity of the market in a timeframe greater than 36 months, and the price

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[13] CUB CONFIDENTIAL Exhibit 104.

risk associated with 5-year hedges is significant. CUB was surprised to see that PacifiCorp's hedge volume target for the 36-48 month range is BEGIN CONFIDENTIAL [redacted]% to [redacted]% END CONFIDENTIAL of total needed gas volume.[14]

This is an unusual amount of a commodity for a utility to hedge so early. As a natural gas-only utility, NW Natural must manage the risks of the gas market. Because natural gas is its only commodity, it would be imprudent for NW Natural to not manage that price risk. Until NW Natural's recent deal with Encana, which is a physical purchase of a 30-year gas supply, NW Natural committed to financial hedges with terms of "up to three years."[15] While NW Natural would have been willing to enter into longer hedges, the gas utility could not find reliable counterparties with acceptable credit ratings.[16] The alternative to the 30-year supply that consultant KPMG was asked to analyze in that docket was a running series of 3-year hedges because this was seen as the prudent default strategy.[17] In addition, PacifiCorp does not have a power cost adjustment mechanism in Oregon that shares the difference between forecasted gas costs and actual gas costs. This means that much of the risk that is being hedged is shareholder risk. As hedging shifts the risk of commodity price fluctuations from shareholders to ratepayers, a commodity purchase strategy that is chiefly reliant upon hedging removes incentives for a utility to prudently manage commodity costs. Exhibit 10 of the Company's official Commercial and Trading Front Office Practices and

[14] CUB CONFIDENTIAL Exhibit 105.
[15] UM 1520 / NWN / 400 / Friedman / 2.
[16] UM 1520 / NWN / 200 / Cronise / 10.
[17] UM 1520 / CUB / 100 / Jenks / 51.

Procedures manual[18] lists explicit target ranges for the percentage of commodity hedging positions the Company should acquire. These guidelines are presented in the format of minimum and maximum ranges for each future 12-month period for four years (48 months total). The target for hedged gas volume in the year-ahead period is in the range of BEGIN CONFIDENTIAL [redacted]% to [redacted]% END CONFIDENTIAL of total required volume. NW Natural hedges approximately 75% of its total gas supply, which is significantly below PacifiCorp's targets. CUB believes that hedging up to 105% of gas volumes is not a prudent hedging strategy.

i. Order from UM 1282

In its Order No. 07-200 adopting the Stipulation filed by the participating Parties in UM 1282, the Oregon Commission indicated that Avista Corp. was engaging in a natural gas purchasing strategy that was imprudent because it was too reliant upon hedging. At the time Avista was hedging 91% of its natural gas load in Oregon. Avista agreed in the Stipulation to cap its hedging at 70% of its Oregon load, which the Commission agreed would provide an incentive for Avista to prudently manage its natural gas costs.

For the last two years where data is available, PacifiCorp hedged 64% of its total natural gas burn in 2008 and 80% in 2009.[19] As noted above, PacifiCorp's guidelines for hedging show that the Company has a target of a minimum of BEGIN CONFIDENTIAL [redacted]%, which would put its hedging at [redacted] END CONFIDENTIAL level as Avista was when Staff filed a complaint challenging the prudence of that company's hedging strategy. The Staff challenge ultimately led to an

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[18] CUB CONFIDENTIAL Exhibit 105.
[19] CUB CONFIDENTIAL Exhibit 106, page 6.

agreement for Avista to significantly reduce its hedging positions. CUB recommends that the Commission impose a limit to PacifiCorp's hedging volumes that is similar to the limit agreed upon by Avista in UM 1282.

ii. Utah OCS Testimony

Dr. Lori Schell submitted expert testimony[20] on behalf of the Utah OCS in Docket 10-035-124 regarding PacifiCorp's natural gas hedging strategy. Dr. Schell shows that the Company's hedging strategy has been the source of heavy financial losses in the recent test period. The long-term hedging component, consisting of hedges that are further out than 36 months, is responsible for BEGIN CONFIDENTIAL [redacted]—nearly [redacted]%.[21] Dr. Schell attributes the long-term hedging losses to the lack of market liquidity for hedges that are greater than 36 months ahead, as few parties are actively trading gas swaps that far into the future.[22] PacifiCorp's hedge volume target for the 36-48 month range is [redacted]% to [redacted]% of total needed gas volume.[23] END CONFIDENTIAL

iii. Portfolio Approach.

In theory, both parties to a hedge have knowledge of the market, and a hedge has a relatively even chance of being in the money or out of the money. Because of this equivalency, it is important for a utility to "hedge" its hedges by spreading out hedges over a period of time so that it is not overly dependent on a single transaction, or on the state of the hedging market at a particular time. There is always a danger that traders will begin to believe that their knowledge of the market is superior and that their insight

[20] CUB CONFIDENTIAL Exhibit 106.
[21] CUB CONFIDENTIAL Exhibit 106, page 6.
[22] CUB CONFIDENTIAL Exhibit 106, page 7.
[23] CUB CONFIDENTIAL Exhibit 105.

will allow them to "win" the hedge. There is also a danger that once a company establishes a goal, traders will fill it quickly in order to meet that objective quickly. To avoid these pitfalls, a portfolio approach should be used that layers hedges on top of each other over a period of time.

If one were to assume that PacifiCorp's counterparty risk is different than NW Natural's and that a five-year window of hedging is prudent, then a portfolio approach would layer on those hedges over that 5-year window. Assuming that hedging 105% of gas purchases is prudent, then the appropriate portfolio approach would be to layer in approximately 21% of the hedges each year for 5 years. However, because the price risk increases the further out a hedge is purchased (5 years in the future is riskier than 3 years), it would be prudent to purchase hedges on an inclining block portfolio (for example, 10% year 5, 15 % year 4, 20% year 3, 25% year 2 and 30% year 1). A strategy based on hedging up to 65% in the first two years contains too much risk.

iv. CUB's Recommendation.

PacifiCorp has failed to demonstrate that its strategy of heavily purchasing hedges at the earliest time possible, when the market is not very liquid and the price risk is the greatest, is prudent. Nor has the Company demonstrated the prudence of hedging up to 105% of expected total gas volumes. PacifiCorp's hedging strategy hedges too much natural gas volume, and, potentially even worse, hedges that natural gas volume too early, creating significant financial risk to customers. Given the volatility of the long-term hedging market and the substantial losses suffered by PacifiCorp and its customers associated with the Company's activity in this market, CUB recommends that the Commission reject as imprudent PacifiCorp's gas hedging strategy.

CUB believes that hedging should generally be limited to about 75% of gas supply, unless a utility can demonstrate that more is prudent under current market conditions. CUB also believes that most hedges should come from a hedging strategy that is executed during the 3 years before the gas is purchased. While a limited amount of hedging should be allowed in a 3 to 5 year window, a utility must demonstrate that the market is liquid at the time and that this early hedging is consistent with a prudent approach to hedging.

PacifiCorp has failed to demonstrate the prudence of its strategy. The Commission should find that the Company's strategy is imprudent—that it over-hedges and hedges too early. In order to protect customers from this flawed strategy, CUB recommends disallowing all hedges in the current TAM which were entered into more than 36 months ahead of the gas delivery. Instead, this gas supply should be re-priced at the forward price curve for gas at the time of the final update in November.

IV. Conclusion

The TAM was not established as a mechanism to remove the incentive for the Company to manage its power costs based on least cost/least risk principles; it was established in order to allow direct access. The very name of this proceeding—Transition Adjustment Mechanism—makes this clear. It was established in order to identify the transition adjustment payments and credits associated with direct access customers.

The rules for the TAM—methodological changes are not allowed in the TAM filing, only in general rate cases—probably prohibits CUB from proposing the elimination of the TAM until the next general rate case. But CUB can identify no better way to create an incentive for PacifiCorp to better manage its power costs than to eliminate the TAM.

In the meantime, CUB recommends that the Commission make the following adjustments to PacifiCorp's TAM filing.

1. *Re-price wind integration costs using BPA rate.*
2. *Reduce forecasted net power costs by $*[redacted] *(Oregon basis) to reflect the average amount of liquidated damages that the Company will likely see associated with forced outages.*
3. *Find PacifiCorp's natural gas hedging strategy to be imprudent and order the Company to remove all hedges that were made more than 3 years before gas delivery. This gas supply should then be priced at the forward price curve for gas in the November update.*

WITNESS QUALIFICATION STATEMENT

NAME:	Bob Jenks
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EDUCATION:	Bachelor of Science, Economics Willamette University, Salem, OR
EXPERIENCE:	Provided testimony or comments in a variety of OPUC dockets, including UE 88, UE 92, UM 903, UM 918, UE 102, UP 168, UT 125, UT 141, UE 115, UE 116, UE 137, UE 139, UE 161, UE 165, UE 167, UE 170, UE 172, UE 173, UE 207, UE 208, UE 210, UG 152, UM 995, UM 1050, UM 1071, UM 1147, UM 1121, UM 1206, UM 1209, and UM 1355. Participated in the development of a variety of Least Cost Plans and PUC Settlement Conferences. Provided testimony to Oregon Legislative Committees on consumer issues relating to energy and telecommunications. Lobbied the Oregon Congressional delegation on behalf of CUB and the National Association of State Utility Consumer Advocates. Between 1982 and 1991, worked for the Oregon State Public Interest Research Group, the Massachusetts Public Interest Research Group, and the Fund for Public Interest Research on a variety of public policy issues.
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Residential Rate Increase 2005-2012

customer charge	$9.00	
customer charge per kWh	0.009207	
total rate:		
Delivery Service	3.774	
Sch 200 power supply	2.872	
Sch 201 Net Variable Power	3.024	
Sch 203	0.034	
sch 102	0.118	
public purposes 3%	0.29466	
Klam JCB	0.033	
Klam C/IG	0.101	
297 EE	0.234	
BPA Res X	-0.473	
rate as of 1/1/12	10.02087	
rate in 2005	6.31	(from Oregon Utility Statistics)
difference	3.710867	
% increase	**59%**	

Note: All adjustments other than Schedule 201 come from: Note: All adjustments other than Schedule 201 come from:

http://www.pacificpower.net/content/dam/pacific_power/doc http://www.pacificpower.net/content/dam/pacific_power/doc/About_Us/Rates_Regulation/Oregon/Approved_Tariffs/Oregon_Price_Summary.pdf

Prices were allocated between the 1st and 2nd rate block based on UE 227/PPL/301/Ridenour/1

Sch 201 TAM rates were from UE 227/PPL/301/Ridenour/1 Sch 201 TAM rates were from UE 227/PPL/301/Ridenour/2

Customer charge was converted to cents/kWh based on UE 22 Customer charge was converted to cents/kWh based on UE 227/PPL/304/Ridenour/2

CUB EXHIBIT 103 IS CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER NO. 10-069

UE 227 - CUB WITNESS QUALIFICATION STATEMENT

CUB EXHIBIT 104 IS CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER NO. 10-069

CUB EXHIBIT 105 IS CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER NO. 10-069

UE 227 - CUB WITNESS QUALIFICATION STATEMENT

CUB EXHIBIT 106 IS CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER NO. 10-069

UE 227 - CUB WITNESS QUALIFICATION STATEMENT

UE 227 – CERTIFICATE OF SERVICE

I hereby certify that, on this 24th day of June, 2011, I served the foregoing **OPENING TESTIMONY FO THE CITIZENS' UTILITY BOARD OF OREGON** in docket UE 227 upon each party listed in the UE 227 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and five copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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