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May 16, 2014

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: UE 267 – In the Matter of PacifiCorp Transition Adjustment, Five-Year Cost-of-Service Opt-Out

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and five copies of PacifiCorp's List of Exhibits to be Entered into the Record, along with hearing Exhibit PAC/500. A copy of this filing was served on all parties to this proceeding as indicated on the attached Certificate of Service.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Katherine McDowell', with a long horizontal flourish extending to the right.

Katherine McDowell

cc: Service List

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 267

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Transition Adjustment, Five-Year Cost-of-
Service Opt-Out.

**PACIFICORP’S LIST OF EXHIBITS
TO BE ENTERED INTO THE RECORD**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits the following list of exhibits that the Company will move into the record in this proceeding, without objection from other parties. All of the exhibits are pre-filed, except Exhibit PAC/500, which is attached to this filing. In addition, the parties have agreed that the Public Utility Commission of Oregon may take official notice of documents filed in docket UM 1587 and docket UM 1050, as referenced in the parties’ briefs.

<u>Pre-filed Exhibits</u>	<u>Description</u>
Advice 13-004	PacifiCorp, dba Pacific Power, Schedule 296, Transition Adjustment, Five-Year Cost of Service Opt-Out, dated February 28, 2013
Exhibit PAC/100	Direct Testimony of Joelle R. Steward, dated June 14, 2013
Exhibit PAC/101	Exhibit Accompanying Direct Testimony of Joelle R. Steward (Proposed Schedule 296, Transition Adjustment, Five-Year Cost of Service Opt-Out)
Exhibit PAC/200	Direct Testimony of Gregory N. Duvall, dated June 14, 2013
Exhibit PAC/201	Exhibit Accompanying Direct Testimony of Gregory N. Duvall (Example Calculation of Schedule 296 Transition Adjustments and Customer Opt-Out Charge)

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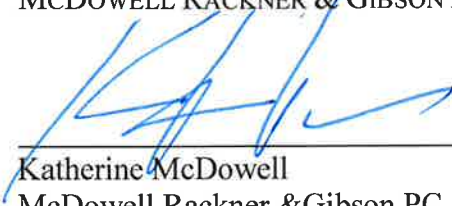
<u>Pre-filed Exhibits</u>	<u>Description</u>
Exhibit PAC/202	Exhibit Accompanying Direct Testimony of Gregory N. Duvall (Estimated Cost Shift for Five-Year Program)
Exhibit PAC/300	Reply Testimony of Joelle R. Steward, dated March 27, 2014
Exhibit PAC/301	Exhibit Accompanying Reply Testimony of Joelle R. Steward, corrected by errata filed May 13, 2014 (Stipulating Parties' Responses to PacifiCorp Data Requests 3 and 4)
Exhibit PAC/400	Reply Testimony of Gregory N. Duvall, dated March 27, 2014, corrected by errata filed May 13, 2014
Exhibit PAC/401	Exhibit Accompanying Reply Testimony of Gregory N. Duvall, corrected by errata filed May 13, 2014 (Updated Example Calculation of Schedule 296 Transition Adjustments and Consumer Opt-Out Charge)
Exhibit PAC/402	Exhibit Accompanying Reply Testimony of Gregory N. Duvall, corrected by errata filed May 13, 2014 (Estimated Cost Shift for Five-Year Program)
Exhibit PAC/403	Exhibit Accompanying Reply Testimony of Gregory N. Duvall (Stipulating Parties' Response to PacifiCorp Data Request 17)
Exhibit PAC/404	Exhibit Accompanying Reply Testimony of Gregory N. Duvall (Staff Exhibit 102, Docket UM 1050 (July 2, 2004))
Exhibit PAC/405	Exhibit Accompanying Reply Testimony of Gregory N. Duvall (Stipulating Parties' Response to PacifiCorp Data Request 20)

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<u>Exhibits</u>	<u>Description</u>
Exhibit PAC/500	PacifiCorp's Response to ICNU Data Requests 3.6, 3.11 and 3.14, dated April 15, 2014

DATED: May 16, 2014

McDOWELL RACKNER & GIBSON PC



Katherine McDowell
McDowell Rackner & Gibson PC

Sarah Wallace
PacifiCorp d/b/a Pacific Power

Attorneys for PacifiCorp

ICNU Data Request 3.6

The Company currently has a single long-term PTP contract servicing the load pocket Yew Avenue from BPA's Redmond substation in central Oregon, detailed as PTP contract 29 in Attachment NAES 2.8 provided in docket UE 245. If the entire load located in the Yew Avenue load pocket elected to be serviced under the five-year direct access opt-out program, does the Company agree that it possesses the right to:

- (1) reassign or sell the unused PTP rights,
- (2) redirect the unused PTP rights to another path, and / or
- (3) elect not to renew this PTP contract when it expired?

Response to ICNU Data Request 3.6

- (1) Disagree. Although the Company could reassign or sell the Bonneville Power Administration (BPA) point-to-point (PTP) rights for Yew Avenue, doing so would violate its obligation as provider of last resort for customers in PacifiCorp's West Balancing Authority Area (PACW).
- (2) Disagree. Although the Company could redirect the BPA PTP rights for Yew Avenue, doing so would violate its obligation as provider of last resort for customers in PACW.
- (3) Disagree. Although the Company could elect to not renew the BPA PTP contract for Yew Avenue, doing so would violate its obligation as provider of last resort for customers in PACW.

ICNU Data Request 3.11

Admit or deny that PacifiCorp can designate new loads and locations to serve with existing transmission rights.

Response to ICNU Data Request 3.11

Deny. PacifiCorp would need to apply to the Bonneville Power Administration (BPA) for new network transmission (NT) rights.

ICNU Data Request 3.14

Does the Company agree that if its BPA NT Network Load on the hour of Monthly Transmission Peak Load were to decline, then the amount paid for NT service and associated ancillary services would also decline? If not, please explain.

Response to ICNU Data Request 3.14

Agree, but note that Bonneville Power Administration's (BPA) "Network Load" definition includes the statement "A Network Customer may elect to designate less than its total load as Network Load but may not designate only part of the load at a discrete Point of Delivery." Therefore, reductions due to direct access opt-out occurring at a discrete Point of Delivery (POD) would not reduce the Company's billing from BPA for network transmission (NT) service that is based on the metered load at the discrete POD.

CERTIFICATE OF SERVICE

1 I hereby certify that I served a true and correct copy of the foregoing document in
2 Docket UE 267 on the following named person(s) on the date indicated below by email
3 addressed to said person(s) at his or her last-known address(es) indicated below:
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12 DATED: May 16, 2014.

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