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May 15, 2014

Attention: Filing Center  
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Re: *PACIFICORP, dba PACIFIC POWER, Transition Adjustment, Five-Year  
Cost of Service Opt-Out*  
PUC Docket No.: UE 267  
DOJ File No.: 860115-GB0282-13

Enclosed for filing is an original and five copies of an errata page for the Joint Testimony of Kevin C. Higgins, George R. Compton, Donald W. Schoenbeck, Steve W. Chriss, and Mary Lynch on behalf of the Stipulating Parties in Support of the Stipulation. A redline and clean copy of Stipulating Parties/100 page 20 are included. This errata page is consistent with the correction noted on page 12, footnote 2 of the Stipulating Parties' Pre-hearing Brief.

Sincerely,

Johanna M. Riemenschneider  
Assistant Attorney General  
Of Attorneys for Staff of the Public  
Utility Commission of Oregon  
Filed on Behalf of the Stipulating Parties

JMR:kt2/5305664  
Enclosures  
c: UE 267 Service List

Stipulating Parties Exhibit 100  
Witnesses: Kevin C. Higgins, George R. Compton, Donald W. Schoenbeck,  
Steve W. Chriss, Mary Lynch

BEFORE THE PUBLIC UTILITY COMMISSION  
OF THE STATE OF OREGON

In the Matter of PacifiCorp, dba            )  
Pacific Power                                 )     Docket No. UE 267  
Transition Adjustment, Five-Year         )  
Cost of Service Opt-Out                    )

ERRATA

Joint Testimony of  
Kevin C. Higgins, George R. Compton, Donald W. Schoenbeck,  
Steve W. Chriss, and Mary Lynch

on behalf of

Staff of the Public Utility Commission of Oregon, Noble Americas Energy  
Solutions LLC, Industrial Customers of Northwest Utilities, Wal-Mart  
Stores, Inc., Constellation NewEnergy, Inc., Shell Energy North America  
(US) L.P., Safeway Inc., The Kroger Co., Vitesse LLC, and the Northwest  
and Intermountain Power Producers Coalition

May 15, 2014

1 A. There are several reasons for doing so. First, the five-year opt out program is a  
2 long-term (and potentially permanent) opt-out program, and therefore the merits  
3 of including a transmission credit are increased. PacifiCorp has opposed a  
4 transmission credit in its annual opt-out programs where customers return to cost  
5 of service rates after one or three years of direct access. PacifiCorp has reasoned  
6 that because direct access customers may return to cost of service rates, the  
7 company must continue to plan for these customers, and therefore retain the  
8 transmission rights to serve these customers. However, with the five-year  
9 permanent opt-out, customers will provide four years' notice before returning to  
10 cost of service rates, and PacifiCorp does not need to retain and continue holding  
11 idle transmission rights formerly used to serve those direct access customers.

12 Second, the Commission has adopted a PGE-type model for the five-year  
13 opt-out program. As noted above, PGE's transmission adjustment includes a  
14 BPA transmission credit for its five-year opt-out program. If PacifiCorp is not  
15 required to include a similar credit, there will be a material and arbitrary  
16 difference between the two programs that will unduly disadvantage customers  
17 located in the PacifiCorp territory. In addition, only 0.1 aMW representing one  
18 small account of the accounts held by a PGE customer that had opted out under the  
19 five-year opt-out has returned to cost of service rates. Thus, while it is possible  
20 that customers may return to PacifiCorp's cost of service rates, it is unlikely and  
21 this supports providing a BPA credit.

22 Third, recognition of a BPA transmission credit removes a structural  
23 impediment to the development of direct access in PacifiCorp's territory, because

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21 unlikely and this supports providing a BPA credit.

22 Third, recognition of a BPA transmission credit removes a structural  
23 impediment to the development of direct access in PacifiCorp's territory, because



1 **CERTIFICATE OF SERVICE**

2 I certify that on May 15, 2014, I served the foregoing Errata Page upon the parties in this  
3 proceeding by electronic mail only as all parties waive paper service.

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