

**DUNBAR
LAW LLC**

July 24, 2020

By Email

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: *In the Matter of PacifiCorp Request for a General Rate Revision* – Docket No. UE 374 –
Tesla Rebuttal Testimony

Dear Filing Center and Counsel:

Attached is the rebuttal testimony of William Ehrlich, submitted by Tesla, Inc. Given the pending settlement involving issues raised by Tesla, Tesla is not submitting more substantive rebuttal testimony at this time. However, should the terms and conditions of the pending settlement not be finalized in the form of a written stipulation agreement that fully preserves the agreed-to points regarding those issues, Tesla reserves all rights, including the right to actively participate in the later phases of this proceeding.

Sincerely,

s/ John J. Dunbar

John J. Dunbar
jdunbar@dunbarlawllc.com

cc: Kevin Auerbacher
Franchesca Wahl
William Ehrlich
Counsel of Record (served through PUC Filing Center)

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PUC No: UE 374
TESLA/200
Ehrlich/1

**REBUTTAL TESTIMONY OF WILLIAM EHRLICH ON BEHALF OF TESLA, INC IN
THE MATTER OF PACIFCORP, dba PACIFIC POWER, REQUEST FOR A GENERAL
RATE REVISION.**

William Ehrlich
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July 24, 2020

TABLE OF CONTENTS

1 **I. INTRODUCTION** 3

2 **II. AGREEMENT IN PRINCIPLE** 3

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE FOR THE RECORD YOUR NAME, POSITION, BUSINESS**
3 **ADDRESS, AND ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS**
4 **PROCEEDING.**

5 **A.** My name is William Ehrlich. I am Senior Policy Advisor for EV Charging Policy and
6 Rates at Tesla, Inc. ("Tesla"). My business address is 3500 Deer Creek Rd, Palo Alto,
7 CA 94304. I am testifying on behalf of Tesla, as I did in my opening testimony, which
8 also described my experience and qualifications. TESLA 100/103.

9 **II. AGREEMENT IN PRINCIPLE**

10 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

11 **A.** Since the submission of my opening testimony on June 4, 2020, Tesla along with other
12 parties including Staff and the Company (PacifiCorp) have reached an agreement in
13 principle on the issues covered by the rate spread and rate design proposal, and therefore,
14 no substantive testimony on these issues will be offered at this time.

15 **Q. WHAT ARE THE ISSUES COVERED BY THE RATE SPREAD AND RATE**
16 **DESIGN PROPOSAL?**

17 **A.** The pertinent issues to Tesla covered by the rate spread and rate design proposal are
18 related to Schedule 45 eligibility and Schedule 29 applicability language, time-of-use
19 period definitions, and customer cap. This concludes my testimony at this time.