## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 374

In the Matter of

UPDATED SIERRA CLUB'S PRE-FILED AND CROSS-EXAMINATION

PACIFICORP d/b/a PACIFIC POWER,

**EXHIBITS** 

Request for a General Rate Revision

## Sierra Club Pre-Filed Exhibits in UE 374

Witness	Exhibit No.	Description
Jeremy Fisher	Sierra Club/100	Highly Confidential Opening Testimony of
		Jeremy Fisher, PhD
	Sierra Club/101	Curriculum Vitae of Jeremy Fisher, PhD
	Sierra Club/102	Public Discovery Responses
	Sierra Club/103	Confidential Direct Testimony of Rick Link in
		20000-418-EA-12 (Wyo.P.S.C.) (provided as an
		attachment to PacifiCorp Response to Sierra Club
		Data Request 1.1)
	Sierra Club/104	Redacted Rebuttal Testimony of Rick Link in
		20000-418-EA-12 (Wyo.P.S.C.)
	Sierra Club/105	WY DEQ Bart Appeal Settlement Agreement
		(November 2010)
	Sierra Club/106	PacifiCorp Emission Reduction Plan (Nov. 2,
		2010)
	Sierra Club/107	PacifiCorp Comments on WY Regional Haze Plan
		(Aug. 26, 2013) (excerpt)
	Sierra Club/108	Confidential Rebuttal Testimony of Dana Ralston
		in UE-152253 (Wash. U.T.C) (provided as an
		attachment to PacifiCorp Response to Sierra Club
		Data Request 1.8(c))
	Sierra Club/109	Redacted Supplemental Rebuttal Testimony of
		Cindy A. Crane in UE-152253 (Wash. U.T.C)
	Sierra Club/110	PacifiCorp Response to Sierra Club Data Request
		4.9 in Docket No. 13-035-184 (Utah P.S.C.)
	Sierra Club/111	Hearing Transcript of Ms. Cindy Crane in Docket
		No. 20000-418-EA-12
		(Wyo.P.S.C)
	Sierra Club/112	"Attach Sierra Club 3.27" in Docket No. LC 70

Witness	Exhibit No.	Description
	Sierra Club/113	Andrew Graham, Life beneath the earth in Wyo's
		only underground coal mine
	Sierra Club/114	Supplemental Testimony of Jeremy Twitchell in
		Docket No. UE-152253 (Wash.U.T.C.)
	Sierra Club/115	Confidential Attachment 1.5-2 to PacifiCorp
		Response to Sierra Club Data Request
	Sierra Club/116	PacifiCorp, 2012 Natural Gas Request for
		Proposals Workshop (Oct. 29, 2013)
	Sierra Club/117	PacifiCorp Response to Sierra Club Data Request
		4.10 in Docket No. 13-035-184 (Utah P.S.C.)
	Sierra Club/118	PacifiCorp Dec. 5, 2013 Memorandum (provided
		as a confidential attachment to PacifiCorp
		Response to Sierra Club Data Request 1.4)
	Sierra Club/119	Highly Confidential Exhibit B Re: Bridger EPC Contract
	Sierra Club/120	Direct Testimony of Susan Arigoni in Docket No.
		11A-917E (Colo. P.U.C.)
	Sierra Club/121	Confidential Technical Workshop: Review of
		Existing Analysis on Craig and Hayden
		Environmental Investments (provided as a
		confidential attachment to PacifiCorp Response to
		Sierra Club 2.6)
	Sierra Club/122	Confidential Attachment to PacifiCorp Response
		to Sierra Club Data Request 2.6-2 (Hayden PVRR)
	Sierra Club/123	Confidential Hayden SCR Recommendation
		Memo (provided as a confidential attachment to
		PacifiCorp Response to Sierra Club Data Request
		2.4)
	Sierra Club/124	Confidential Attachment to PacifiCorp Response
		to Sierra Club Data Request 2.4 (Xcel Energy
		Projects)
	Sierra Club/125	Direct Testimony of James Hill in Docket No.
		10M-245E (Colo. P.U.C.)
David Posner	Sierra Club/200	Opening Testimony of David Posner
	Sierra Club/201	Curriculum Vitae of David Posner
	Sierra Club/202	Morgan Stanley, The second wave of clean
		energy, (December 10, 2019)
	Sierra Club/203	American Electric Power, 2019 AEP Fact Book
		(2019)
	Sierra Club/204	U.S. Securities and Exchange Commission, Alliant
		Energy Form
		10-K for the fiscal year ended December 31, 2019
Ezra Hausman	Sierra Club/300	Opening Testimony of Ezra Hausman, PhD
	Sierra Club/301	Resume of Ezra D. Hausman, Ph.D.

Exhibit No.	Description
Sierra Club/302	Oregon Governor Kate Brown's Executive Order No. 20-04
Sierra Club/303	Oregon Governor Kate Brown's Executive Order No. 17-20
Sierra Club/304	Oregon Global Warming Commission's 2018 Biennial Report to the Legislature for the 2019 Legislative Session
Sierra Club/305	Selected Public Data Responses
Sierra Club/400	Confidential Rebuttal Testimony of Jeremy Fisher, PhD
Sierra Club/401	Exhibit DR-2C to the Direct Testimony of Dana Ralston in UE-152253 (Wash. U.T.C.) (provided as a confidential attachment to Sierra Club Data Request 1.8)
Sierra Club/402	Exhibit DR-3C to the Direct Testimony of Dana Ralston in UE-152253 (Wash. U.T.C.) (provided as a confidential attachment to Sierra Club Data Request 1.8)
Sierra Club/403	Selected Sierra Club Public Data Responses
Sierra Club/404	Confidential Attachment "Bridger Summary Analysis.xlsx." Summary tab to PacifiCorp Response to Sierra Club Data Request 9.1
Sierra Club/405	Confidential Rebuttal Testimony of Rick Link in 20000-418-EA-12 (Wyo. P.S.C.)
Sierra Club/406	2013 PacifiCorp IRP Confidential Vol. III
Sierra Club/407	Redacted Direct Testimony of Jeremy Fisher in 20000-418-EA-12 (Wyo. P.S.C.)
Sierra Club/408	Redacted Rebuttal Testimony of Chad Teply in 20000-418-EA-12 (Wyo. P.S.C.) (excerpt)
Sierra Club/409	PacifiCorp Response to Wyoming Industrial Energy Consumers Data Request 1.83 in 20000- 418-EA-12 (Wyo. P.S.C.)
Sierra Club/410	Confidential Letter from PacifiCorp Energy's William K. Lawson to Wyoming DEQ's David Finley (Jan. 29, 2009) (provided as a confidential attachment to PacifiCorp Response to Sierra Club Data Request 9.6)
Sierra Club/411	Exhibit Sierra Club/114, 2003 PacifiCorp Control Report in UE 246
Sierra Club/412	Exhibit Sierra Club/115, Air Quality Reference Case Investments 2005 in UE 246
Sierra Club/413	Cal. P.U.C Advice Letter 507-E (July 21, 2014)
Sierra Club/414	Docket No. UE-191024 et al. Proposed Settlement Stipulation (Wash. U.T.C)
	Sierra Club/303 Sierra Club/304 Sierra Club/304 Sierra Club/305 Sierra Club/400 Sierra Club/401 Sierra Club/402 Sierra Club/404 Sierra Club/405 Sierra Club/406 Sierra Club/407 Sierra Club/408 Sierra Club/409 Sierra Club/409 Sierra Club/410

Witness	Exhibit No.	Description
Ezra Hasuman	Sierra Club/500	Rebuttal Testimony of Ezra Hausman, PhD
Jeremy Fisher	Sierra Club/600	Confidential Supplemental Rebuttal Testimony of
		Jeremy Fisher, PhD
	Sierra Club/601	PacifiCorp Response to Sierra Club Data Request
		8.2 – 1st Revised
	Sierra Club/602	Confidential attachment to PacifiCorp Response to
		Sierra Club 8.2, 1st Revised (excerpt)

## **Cross-Examination Exhibits**

Exhibit No.	Description	
Sierra Club/700	WA UTC Exhibit CAT-21C, April 24, 2013 SCR Memorandum	
	(provided as a confidential attachment to PacifiCorp Response to	
	Sierra Club Data Request 4.1)	
Sierra Club/701	PacifiCorp Response to Sierra Club Data Request 11.1	
Sierra Club/702	PacifiCorp Response to Sierra Club Data Request 11.2	
Sierra Club/703	Confidential PacifiCorp Response to Sierra Club Data Request 11.3	
Sierra Club/704	PacifiCorp Response to Sierra Club Data Request 11.4	
Sierra Club/705	PacifiCorp Response to Sierra Club Data Request 11.5	
Sierra Club/706	Confidential PacifiCorp Response to Sierra Club Data Request 11.6	
Sierra Club/707	Confidential PacifiCorp Response to Sierra Club Data Request 11.7	
Sierra Club/708	Confidential Attachment to Sierra Club 9.1, "BCC Production-	
	Operating Cost Schedules (4-unit Coal Operation).xlsx", tab "OPEX"	
Sierra Club/709	Confidential Attachment to Sierra Club 9.1, "BRIDGER (2015	
	IRP).xlsx"	
Sierra Club/710	Confidential Attachment to Sierra Club 9.1, "Bridger Summary	
	Analysis.xlsx"	
Sierra Club/711	Confidential Attachment to Sierra Club 1.8, "BRIDGER.xlsx"	
Sierra Club/712	Confidential Attachment to Sierra Club 12.1-1, "BRIDGER.xlsx"	
Sierra Club/713	Confidential Ralston Workpaper "CONF Exhibit_PAC_2603_CONF and WPs.xlsx "	
Sierra Club/714	Confidential Link Workpaper "Link Figures 11, 12, 14.xlsx"	
Sierra Club/715	Attachment to PacifiCorp Response to Sierra Club Data Request 1.6	
Sierra Club/716	PacifiCorp Response to Sierra Club Data Request 12.5	
Sierra Club/717	Confidential PacifiCorp Response to Sierra Club Data Request 7.1	
Sierra Club/718	Confidential Attachment to Sierra Club 7.1-1	
Sierra Club/719	PacifiCorp Response to Sierra Club Data Request 7.2	
Sierra Club/720	Confidential Attachment to Sierra Club 7.2-2:	
	"PIRA_REDACTED_Nominal\$_10.10.13 PROPRIETARY	
	CONF.xlsx"	

Exhibit No.	Description	
Sierra Club/721	Confidential Attachments to PacifiCorp Response to Sierra Club 8.3 -	
	1st supp.	
Sierra Club/722	PacifiCorp Response to Sierra Club Data Request 12.2	
Sierra Club/723	Attachment to Sierra Club 12.2 (Gateway West)	
Sierra Club/724	Attachment to Sierra Club 12.2 (Aeolus West)	
Sierra Club/725	Confidential Attachment to Sierra Club 1.5(b)	
	"nags_ltv_price_outlook_fall_2013_Redacted_WM_PROPRIETARY	
	CONF.xls"	
Sierra Club/726	Confidential Attachment to Sierra Club 7.2-1 "PIRA_nominal\$_2013	
	09 04 PROPRIETARY CONF.xlsx"	
Sierra Club/727	Confidential Attachment to Sierra Club 7.2-2	
	"WM_nags_ltv_price_outlook_fall_2013_REDATCTED_Nominal\$	
	PROPRIETARY CONF.xls"	
Sierra Club/728	PacifiCorp Response to Sierra Club 12.3	
Sierra Club/729	PacifiCorp Response to Sierra Club 12.4	
Sierra Club/730	Confidential Attachments to Sierra Club 12.4	
Sierra Club/731	Confidential PacifiCorp Response to Sierra Club 13.1	
Sierra Club/732	Confidential Attachment to Sierra Club 12.1-1 "BRIDGER.xlsx"	
Sierra Club/733	Confidential Attachment to Sierra Club 1.8 "BRIDGER.xlsx"	
Sierra Club/734	PacifiCorp Response to Sierra Club 12.1	