1	<b>BEFORE THE PUBLIC UTILITY COMMISSION</b>				
2	OF OREGON				
3	UE 390				
4					
5	In the Matter of				
6	PACIFICORP, dba PACIFIC POWER, 2022 Transition Adjustment Mechanism		STAFF'S CROSS- EXAMINATION EXHIBITS		
7					
8					
9	Pursuant to Administrative Law Judge Rowe's June 14, 2021 Ruling, Staff submits the				
10	following cross-examination exhibits in Docket UE 390, not previously filed in this case:				
11					
12	Cross-Examination Exhibit		Description		
13	Staff/1700	PacifiCorp's response to Staff DR 181			
14	Staff has conferred with PacifiCorp, which has indicated that it will stipulate to the admission of				
15	Staff/1700 into the record without the need for cross-examination.				
			DATED this 23 <sup>rd</sup> day of August, 2021.		
16		gust, 2021.			
16 17		gust, 2021.	Respectfully submitted,		
		gust, 2021.	ELLEN F. ROSENBLUM		
17		gust, 2021.	ELLEN F. ROSENBLUM Attorney General		
17 18		gust, 2021.	ELLEN F. ROSENBLUM Attorney General /s/ Sommer Moser		
17 18 19		gust, 2021.	ELLEN F. ROSENBLUM Attorney General /s/ Sommer Moser Sommer Moser, OSB # 105260 Assistant Attorney General		
17 18 19 20		gust, 2021.	ELLEN F. ROSENBLUM Attorney General /s/ Sommer Moser Sommer Moser, OSB # 105260 Assistant Attorney General Of Attorneys for Staff of the Public Utility Commission of Oregon		
17 18 19 20 21		gust, 2021.	ELLEN F. ROSENBLUM Attorney General /s/ Sommer Moser Sommer Moser, OSB # 105260 Assistant Attorney General Of Attorneys for Staff of the Public Utility		
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>		gust, 2021.	ELLEN F. ROSENBLUM Attorney General /s/ Sommer Moser Sommer Moser, OSB # 105260 Assistant Attorney General Of Attorneys for Staff of the Public Utility Commission of Oregon		
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>		gust, 2021.	ELLEN F. ROSENBLUM Attorney General /s/ Sommer Moser Sommer Moser, OSB # 105260 Assistant Attorney General Of Attorneys for Staff of the Public Utility Commission of Oregon		

## Page 1- UE 390 – STAFF's CROSS-EXAMINATION EXHIBITS

CASE: UE 390

## PUBLIC UTILITY COMMISSION OF OREGON

**STAFF CROSS-EXHIBIT 1700** 

August 23, 2021

UE 390 / PacifiCorp August 23, 2021 OPUC Data Request 181

## **OPUC Data Request 181**

Please indicate whether the Company's proposed changes to market caps are intended to be used when the Company implements its AURORA model.

## **Response to OPUC Data Request 181**

PacifiCorp objects to this request as outside the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. The AURORA model has not been used in this proceeding. Without waiving the foregoing objection, PacifiCorp responds as follows:

Yes. Like the Generation and Regulation Initiative Decision Tool (GRID), AURORA requires a constraint on market activity in order to reflect realistic liquidity limitations. To date, PacifiCorp has found that the market cap methodology proposed by the Company in docket UE 390, the "average of averages" methodology, is the most reasonable way to calculate those inputs in a manner that produces the most accurate net power costs (NPC) forecast possible. PacifiCorp has utilized the average of averages market cap methodology in AURORA NPC forecasts recently filed in other states and the results indicate that the Company's proposed methodology more appropriately reflects market liquidity constraints. However, the Company does not intend to foreclose the possibility that further refinements or alternative methodologies might be explored prior to submitting an NPC study in the 2023 transition adjustment mechanism.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.