

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 UE 390

4 In the Matter of
5 PACIFICORP, dba PACIFIC POWER,
6 2022 Transition Adjustment Mechanism
7

STAFF'S CROSS-
EXAMINATION EXHIBITS

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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:

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Cross-Examination Exhibit	Description
Staff/1700	PacifiCorp's response to Staff DR 181

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13
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.

16 DATED this 23rd day of August, 2021.

17 Respectfully submitted,

18 ELLEN F. ROSENBLUM
19 Attorney General

20 */s/ Sommer Moser*

21 _____
22 Sommer Moser, OSB # 105260
23 Assistant Attorney General
24 Of Attorneys for Staff of the Public Utility
25 Commission of Oregon
26 Attorney for Commission Staff

**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.