

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

In the Matter of)	
PacifiCorp, dba Pacific Power,)	Docket No. UE 400
2023 Transition Adjustment)	
Mechanism)	

Opening Testimony and Exhibits of Kevin C. Higgins

on behalf of

Calpine Energy Solutions, LLC

May 25, 2022

1 **OPENING TESTIMONY OF KEVIN C. HIGGINS**

2

3 **Introduction**

4 **Q. Please state your name and business address.**

5 A. My name is Kevin C. Higgins. My business address is 111 East Broadway, Suite
6 1200, Salt Lake City, Utah, 84111.

7 **Q. By whom are you employed and in what capacity?**

8 A. I am a Principal in the firm of Energy Strategies, LLC. Energy Strategies is a
9 private consulting firm specializing in economic and policy analysis applicable to
10 energy production, transportation, and consumption.

11 **Q. On whose behalf are you testifying in this phase of the proceeding?**

12 A. My testimony is being sponsored by Calpine Energy Solutions, LLC (“Calpine
13 Solutions”). Calpine Solutions is a retail energy supplier that serves commercial
14 and industrial end-use customers in 18 states, the District of Columbia, and Baja
15 California, Mexico. Calpine Solutions serves more than 15,000 retail customer
16 sites nationwide, with an aggregate load in excess of 4,500 MW. Calpine
17 Solutions’ retail customers are located in the service territories of more than 55
18 utilities. In Oregon, Calpine Solutions is an Electricity Service Supplier (“ESS”)
19 serving customers in the service territories of PacifiCorp and Portland General
20 Electric (“PGE”).

21 **Q. Please describe your professional experience and qualifications.**

22 A. My academic background is in economics, and I have completed all coursework
23 and field examinations toward a Ph.D. in Economics at the University of Utah. In

1 addition, I have served on the adjunct faculties of both the University of Utah and
2 Westminster College, where I taught undergraduate and graduate courses in
3 economics. I joined Energy Strategies in 1995, where I assist private and public
4 sector clients in the areas of energy-related economic and policy analysis,
5 including evaluation of electric and gas utility rate matters.

6 Prior to joining Energy Strategies, I held policy positions in state and local
7 government. From 1983 to 1990, I was economist, then assistant director, for the
8 Utah Energy Office, where I helped develop and implement state energy policy.
9 From 1991 to 1994, I was chief of staff to the chairman of the Salt Lake County
10 Commission, where I was responsible for development and implementation of a
11 broad spectrum of public policy at the local government level.

12 **Q. Have you ever testified before this Commission?**

13 A. Yes. I have testified in 33 prior proceedings in Oregon, including twelve previous
14 PacifiCorp Transition Adjustment Mechanism (“TAM”) proceedings, UE 390
15 (2022 TAM), UE 375 (2021 TAM), UE 339 (2019 TAM), UE 323 (2018 TAM),
16 UE 307 (2017 TAM), UE 296 (2016 TAM), UE 264 (2014 TAM), UE 245 (2013
17 TAM), UE 227 (2012 TAM), UE 216 (2011 TAM), UE 207 (2010 TAM), and UE
18 199 (2009 TAM). I have also participated in seven PacifiCorp general rate cases,
19 UE 374 (2020); UE 263 (2013), UE 246 (2012), UE 210 (2009), UE 179 (2006),
20 UE 170 (2005), and UE 147 (2003), as well as the PacifiCorp Five-Year Opt-Out
21 case, UE 267 (2013).

22 In addition, I have testified in seven previous PGE general rate cases, UE
23 394 (2021), UE 335 (2018), UE 283 (2014), UE 262 (2013), UE 215 (2010), UE

1 197 (2008), and UE 180 (2006). In addition, I testified in the PGE New Load
2 Direct Access Case, UE 358 (2019); the PGE Opt-Out case, UE 236 (2012); and
3 the PGE restructuring proceeding, UE 115 (2001).

4 I also testified in the Investigation into PacifiCorp's Non-Standard
5 Avoided Cost Pricing, UM 1802 (2017); the 2017 Inter-Jurisdictional Allocation
6 proceeding, UM 1050 (2016); and Phase II of the Investigation into Qualifying
7 Facility Contracting and Pricing, UM 1610 (2015).

8 **Q. Have you testified before utility regulatory commissions in other states?**

9 A. Yes. I have testified in approximately 240 proceedings on the subjects of
10 utility rates and regulatory policy before state utility regulators in Alaska,
11 Arizona, Arkansas, Florida, Georgia, Idaho, Illinois, Indiana, Kansas, Kentucky,
12 Michigan, Minnesota, Missouri, Montana, Nevada, New Mexico, New York,
13 North Carolina, Ohio, Oklahoma, Pennsylvania, South Carolina, Texas, Utah,
14 Virginia, Washington, West Virginia, and Wyoming. I have also prepared
15 affidavits that have been filed with the Federal Energy Regulatory Commission.

16

17 **Overview and Conclusions**

18 **Q. What is the purpose of your testimony in this proceeding?**

19 A. My testimony will focus on issues pertaining to direct access service, in
20 particular, the calculation of the Consumer Opt-Out Charge used in PacifiCorp's
21 five-year opt-out program. However, it is not possible for me to address this
22 subject sufficiently in this opening testimony because PacifiCorp's sample
23 calculation of the Consumer Opt-Out charge, along with supporting workpapers,

1 will not be provided until May 30, 2022 – five days after my opening testimony
2 must be filed.

3 **Q. Do you have any recommendations for the Commission at this time?**

4 A. Yes. I recommend that going forward PacifiCorp be required to adhere to the
5 schedule for filing the Schedule 296 sample calculation as approved in UE 374;
6 that is, the Schedule 296 sample calculation with supporting workpapers should
7 be provided within 30 days after the filing of the TAM. Such a requirement is
8 necessary to provide parties reasonable time to review the accompanying
9 workpapers prior to the filing of their opening testimony.

10 **Q. These informational limitations notwithstanding, are you offering any
11 testimony regarding the Consumer Opt-Out charge at this time?**

12 A. Yes, I offer some observations regarding the final calculation of the Consumer
13 Opt-Out charge in UE 390, the 2022 TAM. In particular, I note that although the
14 2022 TAM sample calculation of the Consumer Opt-Out charge produced a
15 negative value or credit (when corrected to conform to the Commission's order in
16 that case) the final Consumer Opt-Out charge was not negative. The change in
17 result is attributable in large part to a significant drop in the Company's forward
18 price curve for the years 2027-2031 as between the forward price curve used in
19 the sample calculation and the one used in the final Schedule 296 calculation.
20 However, my examination of the Company's forward price curve filed in *this* case
21 shows that the 2027-2031 forward price drop that impacted the final Schedule 296
22 calculation for 2022 was no longer present in the Company's forward price curve

1 two months later. This leads me to conclude that the 2027-2031 forward prices
2 used in setting the 2022 Consumer Opt-Out charge were anomalous.

3

4 **The Need for Timely Provision of Workpapers**

5 **Q. Please explain your concerns regarding the schedule for the provision of**
6 **workpapers in this case.**

7 A. PacifiCorp's filing in this case is following a schedule that is problematic for
8 parties wishing to review the Company's Schedule 296 transition adjustment
9 calculation, which includes the Consumer Opt-Out charge. In the Company's
10 2020 general rate case, UE 374, PacifiCorp agreed to a modification of the TAM
11 guidelines requiring the Company to provide a sample Schedule 296 transition
12 adjustment calculation within 30 days of its TAM filing. The Commission
13 approved this requirement in Order No. 20-473.¹ PacifiCorp complied with this
14 requirement in UE 390 (2022 TAM). Indeed, it was through the filing of the
15 sample calculation that I discovered the Company had introduced a constraint into
16 the calculation that prevented the Consumer Opt-Out charge from going below
17 zero – a matter that was litigated in that case.

18 However, in that same docket, PacifiCorp requested, in surrebuttal
19 testimony, that it be permitted to delay the filing of the Schedule 296 sample
20 calculation in *this* docket until May 30, 2022, approximately 90 days after filing
21 its direct case, if the Company was required to make its TAM filing on March 1,

¹ *In the Matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision*, Docket No. UE 374, Order No. 20-473, at 129, 131 (Dec. 18, 2020).

1 2022.² The Commission granted PacifiCorp’s request in Order No. 21-379.³
2 Subsequently, the procedural schedule in this case established May 25, 2022 as
3 the date for the filing of parties’ opening testimony. This means that PacifiCorp
4 is not required to file its sample Schedule 296 workpapers until five days *after*
5 parties’ opening testimony is due. This timing is obviously problematic for
6 conducting a review of PacifiCorp’s Schedule 296 transition adjustment
7 calculation.

8 **Q. Did Calpine Solutions request that PacifiCorp provide the sample calculation**
9 **through discovery?**

10 A. Yes. When Calpine Solutions requested that PacifiCorp provide the sample
11 calculation in discovery, the Company simply referred to the May 30, 2022 date
12 set in Order No. 21-379.⁴ This situation is particularly ironic, since prior to the
13 2022 TAM, Calpine Solutions routinely requested PacifiCorp through discovery
14 to perform this very calculation – and the Company would provide timely
15 responses. The agreement approved in UE 374 to incorporate the sample
16 calculation requirement in the TAM guidelines was intended to avoid the
17 repetitive step of seeking this information through discovery. Frustratingly, in
18 this case, Calpine Solutions is unable to acquire this information in time for the
19 filing of its opening testimony *either* through the TAM guidelines *or* discovery.
20 Consequently, it is necessary for me to reserve the right to address the Company’s

² *In Re PacifiCorp, dba Pacific Power, 2022 Transition Adjustment Mechanism*, Docket No. UE 390, PAC/1000, Staples/56-57.

³ *In Re PacifiCorp, dba Pacific Power, 2022 Transition Adjustment Mechanism*, Docket No. UE 390, Order No. 21-379, at 43 (Nov. 1, 2021).

⁴ See PacifiCorp Response to Calpine Solutions Data Request 3.1, which is presented in Exhibit Calpine Solutions/101.

1 Schedule 296 sample transition adjustment calculation in a later round of
2 testimony.

3 **Q. Do you have a recommendation for the Commission regarding the timely**
4 **provision of the Schedule 296 sample calculation?**

5 A. Yes. I recommend that going forward PacifiCorp be required to adhere to the
6 schedule for filing the Schedule 296 sample calculation as approved in UE 374;
7 that is, the sample calculation with supporting workpapers should be provided
8 within 30 days after the filing of the TAM. Such a requirement is necessary to
9 provide parties reasonable time to review the accompanying workpapers prior to
10 the filing of their opening testimony.

11

12 **Calculation of the Five-Year Transition Adjustment (Schedule 296) and Consumer**
13 **Opt-Out Charge**

14 **Q. By way of background, what direct access products are available to**
15 **PacifiCorp customers?**

16 A. PacifiCorp offers one-year, three-year, and five-year direct access programs to
17 existing customers. Qualifying new customers may also participate in the
18 Company's New Load Direct Access ("NLDA") program.

19 Prior to the 2016 shopping year, customers in the PacifiCorp territory
20 could only choose between the one-year and three-year programs, pursuant to
21 which the direct access customer pays its Electric Service Supplier ("ESS") for
22 generation supply and continues to pay PacifiCorp for Schedule 200 generation
23 costs, subject to a transition adjustment, as well as delivery costs and applicable

1 riders. At the conclusion of the one-year or three-year term the customer is
2 required to return to cost-of-service or elect a new direct access option.

3 PacifiCorp's five-year opt-out program was initiated for service
4 commencing on January 1, 2016, after the Company was ordered to adopt such a
5 program in Order No. 12-500. In that order, the Commission required PacifiCorp
6 to file a tariff for a five-year opt-out program that would allow a qualified
7 customer to go to direct access and pay transition charges for the next five years,
8 and then to be no longer subject to transition adjustments. After the conclusion of
9 payments of five years of transition adjustments under the program, the customer
10 would only pay PacifiCorp for distribution delivery service and applicable riders.

11 In contrast to the one-year and three-year programs, the five-year opt-out
12 program allows customers to migrate to 100% market prices for generation
13 services (purchased from an ESS) without any remaining obligations to
14 compensate PacifiCorp for generation resources it has acquired for bundled
15 customers.

16 **Q. What is your understanding of the purpose of the transition adjustment?**

17 A. The purpose of the transition adjustment is to provide the appropriate credit or
18 charge for customers who choose direct access service. The transition adjustment
19 is applied either through Schedule 294, Schedule 295, or Schedule 296. Schedule
20 294 is applied to customers who choose a one-year direct access option, Schedule
21 295 is applied to customers who choose a three-year direct access option, and
22 Schedule 296 is applied to customers who select the five-year opt-out that was
23 authorized in UE-267.

1 PacifiCorp’s transition adjustment calculation is a form of Ongoing
2 Valuation as prescribed in OAR 860-038-0140. According to OAR 860-038-
3 0005(41):

4 Ongoing Valuation means the process of determining transition costs or benefits
5 for a generation asset by comparing the value of the asset output at projected
6 market prices for a defined period to an estimate of the revenue requirement of the
7 asset for the same time period.

8 The logical premise behind Ongoing Valuation is to credit or charge direct
9 access customers the difference between market prices and cost-of-service rates.

10 The design logic in this approach places customers in an economically “break
11 even” position with respect to the choice of direct access service; that is, if market
12 prices are below cost-of-service rates at the time the transition adjustment is
13 calculated, the direct access customer is charged the difference via the transition
14 adjustment. Conversely, if market prices are *above* cost-of-service rates, the
15 direct access customer is *credited* the difference via the transition adjustment.

16 The corollary to this design logic is that it holds non-participating
17 customers harmless, as the utility, which buys and sells billions of kilowatt-hours
18 over the course of a year, should be able to dispose of the energy freed up by
19 direct access through market transactions. In the case of PacifiCorp, the transition
20 adjustment analysis consists of evaluating the impact of 25 MW of direct access
21 load on a 10,000 MW system in the calculation of Schedules 294 and 295, and 50
22 MW of direct access load in the calculation of Schedule 296.

23 **Q. How is PacifiCorp’s transition adjustment mechanism for Schedule 296**
24 **calculated?**

1 A. Schedule 296 consists of two major parts: (1) a five-year transition adjustment
2 component that structurally is nearly identical to the calculation of the Schedule
3 294 and 295 transition adjustments, and (2) a Consumer Opt-Out component,
4 which brings forward into Years 1 through 5 the projected Schedule 200 costs for
5 Years 6 through 10, net of projected net power costs savings attributed to the
6 departed opt-out load.

7 In addition to the Schedule 296 charge, the customer must also pay
8 PacifiCorp the base Schedule 200 charge for five years, which may be updated in
9 each rate case during that period.

10 From the effective date of the opt-out election forward, the customer also
11 pays charges for the generation and delivery that the customer will use to serve its
12 load, which includes payments to an ESS for the generation and to PacifiCorp for
13 delivery service under an applicable delivery service tariff.

14 **Q. In prior TAM dockets in recent years, there have been disagreements**
15 **between PacifiCorp and Calpine Solutions regarding the cost escalation rate**
16 **for Schedule 200 that is used in the calculation of the Consumer Opt-Out**
17 **Charge. These disagreements were ultimately resolved through stipulations**
18 **approved by the Commission. Is the 2023 TAM filed by the Company**
19 **consistent with the approved stipulations?**

20 A. The explanation by PacifiCorp witness Michael G. Wilding of how PacifiCorp
21 performs this calculation in the 2023 TAM is consistent with the approved
22 stipulations,⁵ but as I explained above, I am not in a position to verify

⁵ PAC/100, Wilding/57-58.

1 PacifiCorp's calculation of the Consumer Opt-Out charge at this time because the
2 Company has not yet filed its sample Schedule 296 transition adjustment
3 calculation nor the workpapers supporting that calculation.

4 **Q. You noted previously that, in its 2022 TAM filing, the Company introduced a**
5 **constraint in its Schedule 296 calculation that prevented the Consumer Opt-**
6 **Out charge from going below zero. How was that matter resolved?**

7 A. Calpine Solutions challenged the constraint that PacifiCorp introduced into the
8 calculation of the Consumer Opt-Out charge that prevented it from producing a
9 negative value. In Order No. 21-379, the Commission upheld Calpine Solutions'
10 challenge until the matter is fully addressed in UM 2024, finding that that there is
11 no clear prohibition on the opt-out charge becoming a credit.⁶

12 **Q. Have you been able to validate whether PacifiCorp's calculation of the**
13 **Consumer Opt-Out charge is consistent with Order No. 21-379?**

14 A. No. Because the Company's Schedule 296 workpapers are not yet available, I am
15 not in a position to verify whether the Company's treatment of the Consumer Opt-
16 Out charge is consistent with the Commission's requirement that the calculation
17 not be constrained to prevent the Consumer Opt-Out charge from becoming
18 negative (until the issue is fully resolved in UM 2024). Nor am I able to assess
19 whether the Company introduced any other unilateral changes into the calculation
20 as it did in UE 390.

⁶ *In Re PacifiCorp, dba Pacific Power, 2022 Transition Adjustment Mechanism*, Docket No. UE 390, Order No. 21-379, at 42 (Nov. 1, 2021).

1 **Q. When the final Schedule 296 transition adjustment was calculated in**
2 **November 2021 for the 2022 TAM, did it produce negative values for the**
3 **Consumer Opt-Out charge as it did when the sample Schedule 296**
4 **calculation was corrected to remove the constraint?**

5 A. No. Although PacifiCorp's *sample* calculation of the Schedule 296 transition
6 adjustment resulted in a negative Consumer Opt-Out Charge when the constraint
7 was removed, the *final* Schedule 296 Consumer Opt-Out charge was not negative
8 because the Company's projection of the value of freed-up energy in Years 6-10
9 (2027-2031) of the final calculation was significantly lower than the projections
10 used in the sample calculation. In calculating the Consumer Opt-Out charge, the
11 projected value of freed-up energy is important because it represents the net
12 power cost savings to the system that are attributable to the departed load.

13 The sample calculation in the 2022 TAM was made using forward price
14 curves dated December 31, 2020, whereas the final calculation was made using
15 forward price curves dated November 8, 2021. A highly-aggregated summary of
16 the Company's forward price curves on these two dates for Mid-Columbia is
17 presented in CONF Exhibit Calpine Solutions/102.

18 **Q. Do PacifiCorp's workpapers in this case include updated forward price**
19 **curves?**

20 Yes. In the current case, PacifiCorp has provided its forward price curves dated
21 December 31, 2021.⁷ Of note, the forward prices for 2027-2031 (corresponding

⁷ A highly-aggregated summary of PacifiCorp's December 31, 2021 forward price curves for Mid-Columbia is also presented in CONF Exhibit Calpine Solutions/102.

1 to Years 6-10 in the 2022 TAM) for Heavy Load Hours are not dissimilar to the
2 December 31, 2020 forward prices presented in UE-390 one year before. As it
3 stands now, if the Company's final projection of the value of freed-up energy in
4 Years 6-10 is similar to its current projection in this case, the Schedule 296
5 Consumer Opt-Out charge could be negative or close to it. But the final Schedule
6 296 charges will be heavily dependent on the Company's forward price curves in
7 November 2022.

8 **Q. Do you have any other observations regarding the Company's forward price**
9 **curves for 2027-2031?**

10 A. Yes. The increase in the December 31, 2021 forward prices for 2027-2031 filed
11 in this case compared to the November 8, 2021 forward prices that were used in
12 setting the final 2022 TAM Schedule 296 Consumer Opt-Out charge is striking.
13 Compared to the December 31, 2020 and December 31, 2021 forward price
14 curves, the November 8, 2021 forward prices used in setting the final 2022
15 Consumer Opt-Out charge are much lower for the years 2027-2031 than either of
16 these two forward price curves that preceded and followed it. This leads me to
17 conclude that the 2027-2031 forward prices used in setting the 2022 Consumer
18 Opt-Out charge were an aberration.

19 **Q. Does this conclude your opening testimony?**

20 A. Yes, it does.

Docket No. UE 400

EXHIBIT

Calpine Solutions 101

**PacifiCorp Response to Calpine Solutions's
Data Request 3.1**

Calpine Data Request 3.1

Please provide sample calculations and supporting work papers for Schedule 296 (transition adjustments and opt-out charge) that would be applicable to customers served on the following rate schedules as proposed by PacifiCorp in this proceeding:

- (a) Schedule 30-Secondary
- (b) Schedule 30-Primary
- (c) Schedule 48-Secondary
- (d) Schedule 48-Primary
- (e) Schedule 48-Transmission

Response to Calpine Data Request 3.1

In accordance with Public Utility Commission of Oregon (OPUC) Order No. 21-379, Section IV (Next Steps), Sub-Section A (2023 TAM Filing Date) in Docket UE-390:

“The parties agree that PacifiCorp will file the 2023 TAM on March 1, 2022. This date allows PacifiCorp to implement the December 31 forward price curve in its NPC forecast. As requested by PacifiCorp, we agree that PacifiCorp can forego an April 1, 2022 update and that PacifiCorp may provide its Schedule 296 calculation on May 30, 2022”.

Therefore, pursuant to OPUC Order No. 21-379, the requested information will be provided with the Company’s responses to TAM Support Set 4 (Fixed – May 30), scheduled to be filed with the Public Utility Commission of Oregon (OPUC) on May 30, 2022.

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EXHIBIT

Calpine Solutions 102

Comparison of PacifiCorp Mid-C Forward Price Curve Annual Average Prices
 for the 10-Year Period 2022-2031

		Annual Average \$/MWh ¹		
		12/31/2020	11/8/2021	12/31/2021
		Mid C	Mid C	Mid C
		HLH ²	HLH ³	HLH ⁴
		(a)	(b)	(c)
Line No.		Mid-Columbia	Mid-Columbia	Mid-Columbia
		HLH	HLH	HLH
1	2022			
2	2023			
3	2024			
4	2025			
5	2026			
6	2027			
7	2028			
8	2029			
9	2030			
10	2031			

		Annual Average \$/MWh ¹		
		12/31/2020	11/8/2021	12/31/2021
		Mid C	Mid C	Mid C
		LLH ²	LLH ³	LLH ⁴
		(a)	(b)	(c)
Line No.		Mid-Columbia	Mid-Columbia	Mid-Columbia
		LLH	LLH	LLH
11	2022			
12	2023			
13	2024			
14	2025			
15	2026			
16	2027			
17	2028			
18	2029			
19	2030			
20	2031			

Note:

1. The annual average forward price presented here is a simple average of the monthly forward prices. HLH and LLH refer to High Load Hours and Low Load Hours, respectively.

Data Sources:

2. PacifiCorp Response to Calpine Data Request No. 4.1, Confidential Attachment 4.1-2 (NovInd 10yr OR Direct Access x50MW CONF.xlsx).
3. 2022 TAM Compliance Filing (UE-390) work paper (S01_OR TAM22w NovInd_Market Price Index (211108) CONF.xlsx) provided in PacifiCorp Response to Calpine Data Request No. 5.1.
4. Confidential 5-BD Work Papers (GNw_Market Price Index (2112) CONF.xlsx).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 25, 2022, I electronically filed public portions of Calpine Energy Solutions, LLC's Opening Testimony with the Public Utility Commission of Oregon's Filing Center and filed and served the confidential exhibit(s) via e-mail of encrypted and password protected ZIP folders on the following parties qualified to receive such materials under General Protective Order No. 16-128:

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Dated: May 25, 2022

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