

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PCN 8

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Petition for Certificate of Public
Convenience and Necessity.

ORDER

DISPOSITION: STIPULATION ADOPTED; CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY GRANTED

I. INTRODUCTION

In this order, we grant PacifiCorp, dba Pacific Power's, petition for a certificate of public convenience and necessity (CPCN) for its proposed Lone Pine to Whetstone transmission line project (LPW project). In doing so, we adopt a stipulation resolving all issues presented in this docket between PacifiCorp and Staff of the Public Utility Commission of Oregon (Staff), make requisite land use compatibility findings, and conclude that the petition complies with the requirements of ORS 758.015 and relevant Commission rules.

II. BACKGROUND AND PROCEDURAL HISTORY

On December 18, 2024, PacifiCorp filed a notice of its intent to file a petition for a CPCN for its LPW project. On March 11, 2025, PacifiCorp filed its petition for a CPCN along with supporting testimony and exhibits. Commission Staff participated in these proceedings as a party.¹

On May 7, 2025, the Commission's Chief Administrative Law Judge sent a letter to all individuals and entities included in the list of potentially affected landowners included in PacifiCorp's petition notifying them of the Commission's CPCN process and public comment opportunities. The Commission held a public comment hearing in Medford, Oregon on July 9, 2025, and a virtual public comment hearing on July 22, 2025. At both events, all Commissioners were present to hear oral comments from interested members

¹ John Webb and Lynn Ogden intervened in this docket but withdrew as parties on October 22, 2025.

of the public. The Commission also solicited written comments from the public on PacifiCorp's petition.

On July 2, 2025, PacifiCorp filed a motion to waive certain rules and seeking clarification of the scope of these proceedings. On August 11, 2025, we issued Order No. 25-302 denying PacifiCorp's motion, noting we "grant[ed] the parties leave to raise these issues later in this docket's procedural schedule and w[ould] address them in the final order as appropriate."² In that order, we explained:

The company's briefing on its motion raises important and unanswered questions for us and does not lead us to agree with the company that the identified CPCN rules will be "obsolete and * * * irrelevant" in January 2026. We have further questions about unaltered portions of ORS 758.015, such as the unchanged requirement that a utility provide certain information and what the Commission is to do with that information in its review in light of the forthcoming changes to the statute. We also note the company is silent on Staff's point regarding the intersection of HB 3681 and other statutory requirements such as ORS 182.545.³

The parties filed multiple rounds of testimony in this docket. A hearing was scheduled for December 2 and 3, 2025, but was canceled after PacifiCorp and Staff announced they had agreed to mutually waive cross-examination of witnesses. On December 3, 2025, the Administrative Law Judge (ALJ) suspended the remaining procedural schedule at the parties' request to allow PacifiCorp and Staff time to attempt reach a settlement on the remaining contested issues in this docket. On December 8, 2025, PacifiCorp and Staff filed a joint stipulation resolving all issues in this docket and recommending that the Commission grant PacifiCorp its requested CPCN. On December 18, 2025, PacifiCorp and Staff filed a brief in support of the stipulation.

III. PACIFICORP'S PETITION

PacifiCorp seeks a CPCN from us as part of its efforts to construct an approximately 11.5 mile-long, overhead, 230 kilovolt (kV) transmission line between the existing Lone Pine and Whetstone substations.⁴ The transmission line would be constructed near

² Order No. 25-302 at 1 (Aug. 11, 2025).

³ *Id.* at 8.

⁴ PacifiCorp Petition for Certificate of Public Convenience and Necessity (CPCN) at 1 (Mar. 11, 2025).

Medford, in Jackson County, Oregon, and is known as the Lone Pine to Whetstone transmission project (LPW).⁵

PacifiCorp's petition states that "LPW is needed to mitigate transmission facility overloads and associated voltage criteria violations for five unique contingencies in the near-term horizon prior to the planned Sams Valley project * * * and for two additional P6 contingencies in the long-term horizon after the planned Sams Valley project."⁶ The petition asserts that "LPW will reinforce the 230 kV supply to the Lone Pine and Whetstone substations, improving reliability for customers in southern Oregon."⁷ The petition included a land use compatibility statement (LUCS) from Jackson County.⁸ The company seeks to complete the LPW project with an in-service date of October 15, 2027.⁹

The company's petition included descriptions, data, maps, and other information it states was required to comply with our CPCN-related rules to enable us and the public to assess PacifiCorp's proposal.

IV. STIPULATION

PacifiCorp and Staff's (Stipulating Parties) December 8, 2025 stipulation recommends that the Commission approve it as presented, stating that the "Stipulating Parties agree that PacifiCorp has demonstrated that the [LPW] Project complies with ORS 758.015 and the Commission's rules for granting a CPCN."¹⁰ The stipulation "recommend[s] that the Commission grant PacifiCorp's Petition for CPCN for LPW."¹¹

The stipulation explains that the Stipulating Parties "agree that ORS 758.015, as amended by HB 3681, applies to the Commission's final order in this proceeding" because the law went into effect before we issued this order.¹² The stipulation notes the parties' continued disagreement over the necessity of a waiver of Commission rules because HB 3681 removed certain provisions from ORS 758.015 that existed at the time PacifiCorp filed its petition, the stipulation explains that "the Stipulating Parties agree that PacifiCorp provided sufficient evidence for Staff to make findings in support of the agreement in

⁵ PacifiCorp Petition for Certificate of Public Convenience and Necessity (CPCN) at 1.

⁶ *Id.* at 2; PAC/100, Bremmer/13 (describing a P6 contingency as equivalent to an N-1-1 contingency scenario where "two transmission system elements [are] out of service at the same time, but due to independent causes").

⁷ *Id.* at 2.

⁸ *Id.* at 6; PAC/114; Bremer/1-2.

⁹ *Id.* at 6.

¹⁰ Stipulation at 4 (December 2, 2025).

¹¹ *Id.*

¹² *Id.*

Paragraph 13 of this Stipulation.”¹³

The stipulation contains an agreement between the Stipulating Parties “that the CPCN review criteria under ORS 758.015(2)(a) are satisfied because PacifiCorp demonstrated that the [LPW] Project is needed to reinforce capacity between the Lone Pine and Whetstone substations to accommodate load growth and allow greater interconnection of new resources and to provide reliable service[.]”¹⁴

The Stipulating Parties agree that the Commission may rely on the LUCS provided to PacifiCorp by Jackson County, Oregon related to the LPW project in making land use compatibility findings under OAR 860-025-0040(1)-(2).

The stipulation explains that the “Stipulating Parties agree that PacifiCorp has demonstrated that it will construct, operate, and maintain the [LPW] Project in a safe manner * * * as required by OAR 860-024-0010, and that * * * it will also conduct its business in compliance with all applicable federal, state, and local laws, regulations, and ordinances.”¹⁵

The Stipulating Parties agree that the company “demonstrated that [it] considered a range of valid tradeoffs that led to the route selection, including but not limited to permitting constraints, terrain issues, and environmental and wildlife implications.”¹⁶ The stipulation also reflects Stipulating Parties’ agreement “that the route for the [LPW] Project is reasonable and aligned with statutory factors for issuing the CPCN.”¹⁷

The stipulation reflects the Stipulating Parties’ agreement that “PacifiCorp’s environmental justice analysis is sufficient for purposes of this proceeding and for the Commission, as a natural resource agency, to consider the effect of its decision on environmental justice issues and discuss and consider such issues in accordance with ORS 182.545(1).”¹⁸

No objections to the stipulation were filed.

V. APPLICABLE LAW

When an Oregon electric utility “proposes to construct an overhead transmission line which will necessitate a condemnation of land or an interest therein,” it must seek a

¹³ Stipulation at 4.

¹⁴ PacifiCorp Petition for Certificate of Public Convenience and Necessity (CPCN) at 5.

¹⁵ *Id.* at 9.

¹⁶ Stipulation at 6.

¹⁷ *Id.*

¹⁸ *Id.*

CPCN from the Commission.¹⁹ The petition for a CPCN must provide “a detailed description and the purpose of the proposed transmission line, the estimated cost, the route to be followed, the availability of alternate routes, a description of other transmission lines connecting the same areas, and such other information in such form as the commission may reasonably require in determining the public convenience and necessity.”²⁰

We must make our “own investigation to determine whether the proposed transmission line meets a need for increased transmission capacity and reliability in the electric grid and shall enter an order accordingly.”²¹ The standard applicable to PacifiCorp’s petition is the result of HB 3681, which was signed into law in June 2025 and became effective on January 1, 2026. The Commission’s rules governing CPCN petitions were based on statutory language existing at the time they were published on September 4, 2023.

The Commission must “adopt findings which assure the proposed transmission project complies with the Statewide Planning Goals and is compatible with the acknowledged comprehensive plan(s) and land use regulations of each local government where the project is to be located.”²² Such findings may be based “on a Land Use Compatibility Statement (‘LUCS’) issued by an authorized representative from an affected city or county[.]”²³

As an Oregon natural resource agency, the Commission must also consider effects on environmental justice issues.²⁴

If granted, the order approving a petition for a CPCN is “conclusive evidence that the transmission line for which the land is required is a public use and necessary for public convenience” in any related condemnation proceedings.²⁵

VI. DISCUSSION

Under OAR 860-001-0350, the Commission may adopt, reject, or propose to modify a stipulation. If the Commission proposes to modify a stipulation, the Commission must explain the decision and provide the parties with sufficient opportunity on the record to present evidence and argument to support the stipulation. We review settlements on a

¹⁹ ORS 758.015(1).

²⁰ ORS 758.015(1).

²¹ *Id.*

²² OAR 860-025-0040(1).

²³ OAR 860-025-0040(3).

²⁴ ORS 182.545(1).

²⁵ ORS 758.015(2)(c).

holistic basis to determine whether they serve the public interest and meet applicable statutory criteria.

A party may challenge a settlement by presenting evidence that the overall settlement results in something that is not compatible with a just and reasonable outcome. Where a party opposes a settlement, we will review the issues pursued by that party and consider whether the information and argument submitted by the party suggests that the settlement is not in the public interest or otherwise is not in accordance with the law.

Here, we have reviewed the stipulation, joint supporting brief, attestation, and testimony submitted by PacifiCorp and Staff. We adopt the stipulation as a reasonable resolution of the issues raised by the parties. We find that the terms of the stipulation are supported by sufficient evidence, appropriately resolve issues in these proceedings, and comply with applicable law. We determine that the stipulation contributes to an overall settlement in the public interest. Accordingly, we adopt the stipulation in its entirety.

In doing so, we find that the LPW project and PacifiCorp's petition for a CPCN is consistent with ORS 758.015 and relevant Commission rules. The record demonstrates that the LPW project will meet a transmission capacity and reliability need. The record further demonstrates that the company plans to construct, operate, and maintain the LPW project in a manner meeting applicable safety standards and requirements.

We accept the LUCS issued by Jackson County, Oregon.²⁶ The LUCS confirms that the LPW project "will be compatible with the jurisdiction's acknowledged comprehensive plan if [PacifiCorp] obtains" a "Type 3 Conditional Use Permit (CUP)" and that "the acknowledged comprehensive plan's general provisions will not be substantially affected by issuance of a certificate if [that permit is] obtained."²⁷ Based on the submitted LUCS, the LPW project complies with the Statewide Planning Goals and is compatible with Jackson County's acknowledged comprehensive plan. Should the LUCS be revoked or modified as contemplated by OAR 860-025-0040(5), we direct PacifiCorp to promptly notify us of that development.

In granting PacifiCorp's petition for a CPCN, we have considered the effects of granting it on environmental justice issues, as required by ORS 182.545, including the company's environmental justice analysis discussed in its testimony and the joint brief supporting the stipulation.²⁸

²⁶ PAC/114, Bremmer 1-2.

²⁷ *Id.*

²⁸ PAC/100, Bremmer/61-62.

Finally, although we adopt the stipulation and grant a CPCN to PacifiCorp for the LPW project, we note our intent to further discuss the requirements for CPCN petitions and our review of them in light of recent amendments to ORS 758.015 by initiating a rulemaking to amend our CPCN-related rules in the near future.

VII. ORDER

IT IS ORDERED that:

1. The stipulation between PacifiCorp, dba Pacific Power, and Staff of the Public Utility Commission of Oregon, filed December 8, 2025, attached as Appendix A, is adopted;
2. PacifiCorp is granted a Certificate of Public Convenience and Necessity to construct the Lone Pine to Whetstone Project as described in its petition;
3. PacifiCorp is directed to promptly notify the Public Utility Commission of Oregon of any revocation or modification of the Land Use Compatibility Statement relied upon by this order; and
3. PacifiCorp's Certificate of Public Convenience and Necessity will expire in accordance with OAR 860-025-0035(3).

Made, entered, and effective February 3, 2026.



Letha Tawney
Chair



Les Perkins
Commissioner



Karin Power
Commissioner

A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480 through 183.484.

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STIPULATION

On March 11, 2025, PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company) filed with the Public Utility Commission of Oregon (Commission) its Petition for a Certificate of Public Convenience and Necessity (CPCN) for the Lone Pine to Whetstone transmission line project (LPW or Project), an approximately 11.5-mile-long, overhead, 230 kilovolt (kV) transmission line between the existing Lone Pine substation north, and west to the existing Whetstone substation near Medford in central Jackson County (the County). This Stipulation resolves all issues among PacifiCorp and Staff (Stipulating Parties) to recommend that the Commission grant a CPCN for the Project.

PARTIES

1. The parties to this Stipulation are PacifiCorp and Staff of the Public Utility Commission of Oregon (Staff).
2. Lynn Ogden and John Webb filed a petition to intervene in this docket on July 30, 2025, which was granted by Administrative Law Judge (ALJ) John Mellgren on August 5, 2025. On October 22, 2025, Ms. Ogden and Mr. Webb withdrew as intervenors.

BACKGROUND

3. On March 11, 2025, PacifiCorp filed its Petition for CPCN for LPW in accordance with the filing requirements under OAR 860-025-0030.¹ On April 22, 2025, ALJ Mellgren issued a ruling establishing the procedural schedule for PCN 8.²

4. Before any significant activity occurred in this docket, the Oregon Legislature passed House Bill (HB) 3681 which amended the CPCN review criteria under ORS 758.015(2). On June 26, 2025, ALJ Mellgren issued a ruling requesting parties to file brief letters outlining their respective views whether there would be, and to what extent there may be, impacts on the procedural schedule and to indicate if a conference should be scheduled to discuss the impacts of HB 3681.³

5. In response, PacifiCorp submitted a Motion for a Partial Waiver and Clarification of Scope regarding OARs 860-025-0030, 860-025-0035, and 860-025-0040, and that the Commission clarify the scope of review for the Company's Petition for CPCN pursuant to HB 3681 (Motion).⁴

6. Staff opposed PacifiCorp's Motion and recommended that parties address waivers of the CPCN rules in closing briefs and the Commission decide on PacifiCorp's Motion in the final order.⁵

7. On August 11, 2025, the Commission issued Order No. 25-302 finding that PacifiCorp's Motion was premature and that the Company's request that the Commission

¹ PacifiCorp's Petition of Public Convenience and Necessity (Mar. 11, 2025). Prior to filing its petition, on March 11, 2025, PacifiCorp provided a Notice of Intent which was copied to all landowners, informing them of the Company's plan to file the Petition and the need for the line. *See* PacifiCorp's Notice of Intent to File a Petition for Certificate of Public Convenience and Necessity (Dec. 18, 2024).

² Ruling – Disposition: Procedural Schedule Established (Apr. 22, 2025).

³ Ruling – Disposition: Deadline Established (June 26, 2025).

⁴ PacifiCorp's Request for Partial Waiver and Clarification of Scope (July 2, 2025).

⁵ Staff's Response to PacifiCorp's Motion at 1-2 (July 17, 2025).

1 “waive certain rules and clarify others now could preclude Staff and any intervenors from
 2 effectively participating in our proceedings or raising arguments related to the new standard.”⁶
 3 Accordingly, the Commission concluded that it would entertain arguments regarding the
 4 applicability of its CPCN rules in briefing and at oral argument in this docket and would
 5 address them in the final order.⁷

6 8. The Commission held Public Comment Hearings on July 9, 2025, and July 22,
 7 2025, to afford an opportunity for PacifiCorp’s customers, intervenors, and members of the
 8 public to offer comments to the Commission and ALJ regarding their concerns about the line.

9 9. Over the course of this proceeding, PacifiCorp responded to 76 data requests
 10 from Staff including 29 standard data requests. This proceeding also included five rounds of
 11 written testimony. PacifiCorp witness Kristopher Bremer filed Direct Testimony in support of
 12 the Company’s Petition for CPCN on March 11, 2025. Staff and Ms. Ogden and Mr. Webb
 13 filed Opening Testimony on August 11, 2025. PacifiCorp filed the Reply Testimony of Mr.
 14 Bremer on September 18, 2025. Staff filed its Rebuttal Testimony on October 23, 2025.
 15 PacifiCorp filed the Surrebuttal Testimony of Mr. Bremer on November 10, 2025.

16 10. The parties agreed to a mutual waiver of cross-examination.⁸ The ALJ issued a
 17 notice of cancelation of the cross-examination hearing on November 24, 2025.⁹

18 11. The Stipulating Parties convened a settlement conference on November 25,
 19 2025, and engaged in negotiations intended to result in an agreement in principle resolving all
 20 issues in docket PCN 8. With Staff’s support, PacifiCorp moved on December 2, 2025, to

⁶ Order No. 25-302 at 8 (Aug. 11, 2025).

⁷ *Id.*

⁸ PacifiCorp’s Motion to Modify the Procedural Schedule at 1-2 (Nov. 18, 2025). Staff supported PacifiCorp’s Motion. *Id.* at 2.

⁹ Notice of Cancellation of the December 2, and December 3, 2025 Hearing (Nov. 24, 2025).

suspend the procedural schedule to allow for more time for Parties to reach a final agreement.¹⁰ ALJ Mellgren issued a ruling suspending the procedural schedule on December 3, 2025.¹¹ PacifiCorp moved to admit Parties' Stipulation and PacifiCorp's Attestation of Adam Lint on December 8, 2025.

12. The settlement establishes that Stipulating Parties are in agreement that the Commission should grant PacifiCorp's Petition for CPCN for LPW. The terms of the settlement are captured in this Stipulation.

AGREEMENT

13. Recommendation for CPCN: The Stipulating Parties agree to submit this Stipulation to the Commission and request that the Commission approve the Stipulation as presented. The Stipulating Parties agree that PacifiCorp has demonstrated that the Project complies with ORS 758.015 and the Commission's rules for granting a CPCN. Therefore, Stipulating Parties recommend that the Commission grant PacifiCorp's Petition for CPCN for LPW.

14. Application of HB 3681: The Stipulating Parties agree that ORS 758.015, as amended by HB 3681, applies to the Commission's final order in this proceeding since the law becomes effective on January 1, 2026—before the Commission's target final order deadline of February 13, 2026. Although the Stipulating Parties disagree on the necessity of a waiver of the Commission's rules implementing the criteria removed by HB 3681, the Stipulating Parties agree that PacifiCorp provided sufficient evidence for Staff to make findings in support of the agreement in Paragraph 13 of this Stipulation.

¹⁰ PacifiCorp's Motion to Suspend Procedural Schedule at 1 (Dec. 2, 2025).

¹¹ Ruling: Motion Granted; Procedural Schedule Suspended; Deadline Established (Dec. 3, 2025).

1 15. Need for Reliability and Capacity in the Electric Grid: The Stipulating Parties
2 agree that the CPCN review criteria under ORS 758.015(2)(a) are satisfied because PacifiCorp
3 demonstrated that the Project is needed to reinforce capacity between the Lone Pine and
4 Whetstone substations to accommodate load growth and allow greater interconnection of new
5 resources and to provide reliable service to PacifiCorp's customers in southern Oregon.

6 16. Land Use Compatibility: The Stipulating Parties agree that the Commission
7 may rely on a land use compatibility statement (LUCS) under OAR 860-025-0040(3) and
8 ORS 758.015(2)(a). The Stipulating Parties also agree that the LUCS from Jackson County is
9 sufficient under OAR 860-025-0040(3)(c) insofar as it states that the proposed transmission
10 project will be compatible with Jackson County's acknowledged comprehensive plan,
11 provided that the Company secures the permit identified therein. As such, the Stipulating
12 Parties agree that the Commission may rely on the LUCS to make land use compatibility
13 findings under OAR 860-025-0040(1) and (2), while recognizing that such findings do not
14 constitute a final land use decision. Furthermore, the Stipulating Parties acknowledge that if
15 the LUCS upon which the Commission based its land use compatibility findings is revoked or
16 modified to include a finding that the transmission line is incompatible with the County's
17 comprehensive plan or implementing regulations after the Commission has issued a CPCN,
18 that the Commission may amend or withdraw the CPCN final order pursuant to OAR 860-
19 025-0040(5).

20 17. Safety: The Stipulating Parties agree that PacifiCorp has demonstrated that it
21 will construct, operate, and maintain the Project in a safe manner in accordance with the 2023
22 Edition of the National Electrical Safety Code (NESC) as required by OAR 860-024-0010,
23 and that PacifiCorp assures that in addition to complying with the NESC, it will also conduct

APPENDIX A

its business in compliance with all applicable federal, state, and local laws, regulations, and ordinances.

18. Attestation: In support of the Stipulating Parties' agreement in Paragraph 17 of this Stipulation, PacifiCorp provides the Attestation of Adam Lint as Attachment A to this Stipulation regarding the required clearances around 230 kV lines, including reference to NESC and any other relevant standards used for the basis for that determination, and any relevant exceptions and mitigations.

19. Route Selection: The Stipulating Parties agree that PacifiCorp has demonstrated that the Company considered a range of valid tradeoffs that led to the route selection, including but not limited to permitting constraints, terrain issues, and environmental and wildlife implications. The Stipulating Parties further agree that the route for the Project is reasonable and aligned with statutory factors for issuing the CPCN.

20. Environmental Justice: The Stipulating Parties agree that PacifiCorp's environmental justice analysis is sufficient for purposes of this proceeding and for the Commission, as a natural resource agency, to consider the effect of its decision on environmental justice issues and discuss and consider such issues in accordance with ORS 182.545(1).

21. If this Stipulation is challenged, the Stipulating Parties agree that they will continue to support the Commission's adoption of the terms of this Stipulation. The Stipulating Parties agree to cooperate in any hearing and put on such a case as they deem appropriate to respond fully to the issues presented, which may include raising issues that are incorporated in the settlements embodied in this Stipulation.

APPENDIX A

1 22. The Stipulating Parties have negotiated this Stipulation as an integrated
2 document. If the Commission rejects all or any material part of this Stipulation or adds any
3 material condition to any final order that is not consistent with this Stipulation, each
4 Stipulating Party reserves its right, pursuant to OAR 860-001-0350(9), to present argument in
5 support of the Stipulation or to withdraw from the Stipulation. The Stipulating Parties agree
6 that in the event the Commission rejects all or any material part of this Stipulation or adds any
7 material condition to any final order that is not consistent with this Stipulation, the Stipulating
8 Parties will meet in good faith within 5 business days and discuss next steps. A Stipulating
9 Party may withdraw from the Stipulation after this meeting by providing written notice to the
10 Commission and the other Stipulating Party. The Stipulating Parties shall be entitled to seek
11 rehearing or reconsideration pursuant to OAR 860-001-0720 in any manner that is consistent
12 with the agreement embodied in this Stipulation.

13 23. By entering into this Stipulation, no Stipulating Party shall be deemed to have
14 approved, admitted, or consented to the facts, principles, methods, or theories employed by
15 any other Stipulating Party in arriving at the terms of this Stipulation, other than those
16 specifically identified in the body of this Stipulation. No Stipulating Party shall be deemed to
17 have agreed that any provision of this Stipulation is appropriate for resolving issues in any
18 other proceeding, except as specifically identified in this Stipulation.

19 24. This Stipulation is not enforceable by any Stipulating Party unless and until
20 adopted by the Commission in a final order. Each signatory to this Stipulation acknowledges
21 that they are signing this Stipulation in good faith and that they intend to abide by the terms of
22 this Stipulation unless and until the Commission rejects or adopts only in part the Stipulation.


APPENDIX A

1 The Stipulating Parties agree that the Commission has exclusive jurisdiction to enforce or
2 modify the Stipulation.
3 25. This Stipulation may be executed in counterparts and each signed counterpart
4 shall constitute an original document.

STAFF

By: /s/ Marli Klass
Marli Klass, OSB No. 223244
Assistant Attorney General
Of Attorneys for PUC
Date: December 8, 2025

PACIFICORP

By: 
Date: December 8, 2025

APPENDIX A

8 of 8