

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 374**

In the Matter of	)	RESPONSE OF THE ALLIANCE OF
	)	WESTERN ENERGY CONSUMERS TO
PACIFICORP, dba PACIFIC POWER,	)	OREGON PUBLIC UTILITY
	)	COMMISSION BENCH REQUEST
Request for a General Rate Revision.	)	
_____	)	

Pursuant to the Administrative Law Judge’s November 18, 2020 Bench Request, the Alliance of Western Energy Consumers (“AWEC”) files this Response. The Bench Request asks:

Refer to PAC/4100, Ralston/20 (“The requirement to maintain the mine for 21 additional months and install a de-watering pipeline extending approximately six miles in length significantly increased mine closure costs.”) Please provide a breakdown of the mine closure cost increases, separately identifying the costs associated with the increase in the length of the de-watering pipe and the costs of 21 months of additional mine maintenance.

**RESPONSE**

A breakdown of the sources of the overrun in Deer Creek Mine closure costs was provided in Exhibit AWEC/504, included with the Rebuttal Testimony of Dr. Lance D. Kaufman. As Dr. Kaufman testified at AWEC/500, Kaufman 23:3-4, “[n]early all of the costs between 2016, the original closure date, and 2018, the actual closure date, were labor costs or payments to ... East Mountain Energy.” AWEC does not have sufficient information to identify whether any of these costs could be considered to be “associated with the increase in the length

of the de-watering pipe” or how these costs could be broken out between the cost of the de-watering pipe and the cost of additional mine maintenance.

Dated this 25th day of November, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, OR 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

[tcp@dvclaw.com](mailto:tcp@dvclaw.com)

Of Attorneys for the

Alliance of Western Energy Consumers