

October 21, 2005

***Via Electronic Filing and U.S. Mail***

Oregon Public Utility Commission  
Attention: Filing Center  
PO Box 2148  
Salem OR 97308-2148

Re: In the Matter of NORTHWEST INDEPENDENT POWER PRODUCERS COALITION  
Petition for an Investigation Regarding Competitive Bidding  
OPUC Docket No. UM 1182

Dear Filing Center:

Enclosed for filing in the above-captioned docket are Portland General Electric's Reply Comments. This document is being filed by electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

/s/ J. RICHARD GEORGE FOR  
V. DENISE SAUNDERS

VDS:am

Enclosure

cc: UM 1182 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1182**

In the Matter of )  
NORTHWEST INDEPENDENT )  
POWER PRODUCERS )  
COALITION )  
Petition for an Investigation )  
Regarding Competitive Bidding )

REPLY COMMENTS OF  
PORTLAND GENERAL  
ELECTRIC COMPANY

**Introduction**

Portland General Electric Company (“PGE”) submits these Reply Comments in accordance with the procedural schedule previously adopted in this proceeding. Our comments are organized to correspond to the numbered sections of Public Utility Commission of Oregon Staff’s (“Staff”) Straw Proposal and the issues raised by other parties in their Opening Comments with regard to those sections.

**1. RFP After IRP**

**A. Disclosure Of Transmission Arrangements for a Self-Build Option Should Be Limited to Generation Interconnection or Transmission Service Requests and Should Not Extend to Confidential Commercial Strategy**

Several parties support Staff’s proposal that the utility should identify in its Integrated Resource Plan (“IRP”) Action Plan the transmission arrangements for any utility–owned site that it plans to consider. PGE has no objection to identifying any requests for interconnection or transmission service that it has submitted in connection with a utility–owned site identified in its IRP Action Plan. Such requests and any studies related to the requests are posted on the applicable transmission provider’s Open Access Same-Time Information System (“OASIS”).

However, PGE believes that, to the extent it has not made any transmission or interconnection requests, it should not be required to disclose its strategy with regard to when and where it might submit such requests. Such information is confidential commercial information, which is subject to protection from discovery by rule 36(c) (7) of the Oregon Rules of Civil Procedure.

Furthermore, the public disclosure of such information could potentially harm PGE and its customers by providing other parties and potential bidders with the opportunity to purchase and tie up transmission that PGE is considering for a self-build resource. Potential bidders may have an incentive to pursue such a strategy if the transmission capacity is considered scarce and of high value, or to disadvantage the utility self-build option, thereby making a competing resource more attractive. Accordingly, PGE maintains that it should be treated equitably with other potential bidders and only be required to disclose transmission arrangements for a Benchmark Resource to the same extent that other bidders are required to do so. Typically bids indicate only whether firm delivery of power from a resource to PGE's load is guaranteed, not how the delivery will be accomplished. Any transmission uncertainties, whether for RFP bids or for a Benchmark Resource, should be treated equally in the scoring and evaluation criteria. We therefore propose that the last sentence of the first provision in Staff's Straw Proposal be revised to read as follows:

“If the utility plans to consider a utility-owned site it should identify any generation interconnection or transmission service requests that it has made in connection with the site and indicate the status of such requests.”

## 2. RFP Requirement

### A. A Ten-Year and 100 Average Megawatt Threshold For Defining a Major Resource Strikes a Reasonable Balance Between Ensuring a Robust Decision Making Process and Enabling a Utility to Efficiently Acquire the Best Resources for its Customers

PGE continues to believe that threshold measures for a Major Resource should be ten years<sup>1</sup> and 100 MWa. Staff's proposal is for five years and 50 MW, and some other parties also recommend lower thresholds. As we stated in our Opening Comments, PGE believes that setting low threshold measures for a Major Resource "may preclude the possibility of capturing some high-value resources on behalf of customers." PGE's Opening Comments at 2-3. PGE advocates a 100 MWa threshold, rather than Staff's 50 MW, to facilitate timely acquisition of wind resources or other low capacity factor resources for customers. In the case of wind, a 50 MW threshold translates into only 15 to 20 MWa, effectively precluding wind resources from qualifying for an exception to the RFP requirements under Section 4 of Staff's Proposal.

Staff proposes a five-year measure based on the risk management policies of Oregon investor-owned utilities, under which "transactions with delivery terms greater than 48 months generally require prior approval by senior management." Staff's Opening Comments at 2. The fact that transactions in the five- to ten-year range may require senior management approval is not a good reason to hamper a utility's ability to act promptly to acquire attractively priced opportunities in this tenure range. The process for obtaining approval from senior management

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1 The duration threshold that the Commission adopts should be calculated based on the actual duration of the delivery of the energy not on the time period of the contract. In other words, it should **not** be calculated based on the period from when the contract was entered into until when the contract is terminated. Rather it should be based on the actual time period over which the energy will be delivered.

is considerably less burdensome and time-intensive than a RFP process. The Commission must ensure that the burdens and restrictions imposed on the utility, Commission Staff and bidders in an RFP process are commensurate with the duration of the resource being acquired. PGE submits that it does not make sense to spend a year or more evaluating transactions in the five- to ten-year range. Setting the threshold at the ten-year level strikes a more reasonable balance between ensuring a robust decision making process and enabling a utility to efficiently acquire the best resources for its customers.

**B. Staff’s Straw Proposal Provides Flexibility for Both Single-Source and All-Source RFPs**

Idaho Power notes that its “current practice does not include conducting all-source RFPs. Instead, the Company seeks competitive bids on a resource-by-resource basis ....” Idaho Power Company’s Opening Comments at 2. PGE opposes limiting RFPs to “single source.” We support Staff’s Straw Proposal provisions which, in effect, allow for different types of RFPs – “single-source,” “all-source,” or other. Staff’s flexible approach will allow for RFPs which are appropriate for the circumstances, whatever those circumstances might be.

**6. Utility Ownership Options**

**A. Allowing Bidding on a Utility’s Site Raises a Host of Complex Fairness, Procedural And Implementation Issues, and Does Not Further the Goals of IRP or RFP**

PGE urges the Commission to reject the proposal by some parties that bidders in an RFP with a Benchmark Resource may submit bids to construct at the utility’s site. See Northwest Independent Power Producers Coalition (“NIPPC”) Opening Comments at 12-13; Opening Comments of Citizens’ Utility Board, Renewable Northwest Project, and NW Energy Coalition

(“CUB, et al.”), Attachment, Section 6; Industrial Customers of Northwest Utilities’ (“ICNU”) Opening Comments at 9. Neither ICNU nor CUB, et al., offer any reason for this addition. NIPPC states that such a requirement is “probably” consistent with existing practice. NIPPC Opening Comments at 12. However, NIPPC identifies no examples of such existing practices. NIPPC also states that the proposed requirement would recognize the value that a competitive third party could bring to the utility’s site. *Id.* NIPPC does not, however, explain how that competitive value would materialize.

Indeed, all of the parties ignore the fact that to truly foster competition, such an option should be made equally available to all RFP participants including the utility by allowing a utility, as well as other bidders, to bid to develop other bidders’ sites. While such parity is essential to assure fairness, it presents difficult implementation issues. For example, all bidders would have to make their sites publicly available to all other bidders. An additional round of bidding would then be needed to allow the utility and bidders to bid on each other’s sites. Complex scoring and evaluation criteria would need to be developed to evaluate these types of bids. Additional complications would arise if a given site has multiple owners or facilities that are shared with third parties or existing utility-owned resources. In short, allowing for the submission of bids to develop other entity’s sites, whether another utility’s or an Independent Power Producer’s (“IPP”), raises complex fairness, procedural and implementation issues.

It is not necessary to open the process to these complex issues, because whoever develops a particular site will need to use contractors and suppliers to do the actual development. Based on PGE’s experience, the primary difference between having an IPP or a utility develop any given

site is an issue of who can negotiate better deals with engineering and construction contractors and turbine suppliers. This is an element that would be very difficult to evaluate with any degree of accuracy in an RFP because it involves issues other than cost. For example, default, liability and force majeure contract provisions negotiated by the parties can affect not only the final cost of a project, but also its timing, and, in some cases, the likelihood that the project will be completed at all.

It would be extremely difficult to evaluate all of these factors as part of an RFP. Moreover, the focus of an RFP should **not** be on who can negotiate a better deal with a contractor. Rather, the focus should be on which resources -- benchmark or bid based -- are the better fit in a portfolio that seeks to provide the best combination of expected costs and associated risks and uncertainties for the utility and its customers.

**B. The Use Of a Utility's Transmission System and Rights Is Governed by Federal Law**

CUB, et al., propose that a bidder be able to use the utility's transmission system and rights. Opening Comments of CUB, et al., Attachment, Section 6. Federal Energy Regulatory Commission rules govern the use of PGE's transmission system. Under those rules, PGE is required to provide transmission service on a non-discriminatory first-come, first served basis and does not have the authority to make special allowance for bidders (or for the utility's merchant function) in an RFP. Furthermore, to the extent that PGE's merchant arm has purchased transmission rights on PGE's or another entity's transmission system, any resale or assignment of those rights must be provided pursuant to PGE's FERC electric tariff. The OPUC should not

impose any requirements in this process that affect the use of or rights on PGE's transmission system, as doing so may be incongruent with FERC open access rules.

## **7. Independent Evaluator**

### **A. PGE Supports PacifiCorp's Approach for Ensuring an Independent and Experienced Independent Evaluator**

Both Idaho Power and PacifiCorp argue against overly prescriptive criteria for the selection of an Independent Observer. Idaho Power's Opening Comments at 4; PacifiCorp's Opening Comments at 7-8. PGE agrees with these parties that the qualified pool of competent and independent Independent Evaluators ("IEs") may be too small to categorically exclude IEs with recent experience in Western Markets. We also agree that in addition to independence, knowledge and experience are important qualifications for an IE. PGE supports PacifiCorp's proposed approach for ensuring an independent and experienced IE. *See* PacifiCorp's Opening Comments at 7-8.

## **8. Bid Scoring and Evaluation Criteria**

### **A. PGE Supports Staff's Approach to Environmental Scoring**

Staff advocates a flexible environmental scoring approach that can change over time. *See* Staff's Opening Comments at 5-6. Staff cites to the Commission's statement in Order No. 91-1383 that "[i]f actual experience suggests different numbers or a different approach, the Commission will again address the issue" to support such an approach. Staff specifically recommends that "the Commission adopt environmental scoring based on IRP analysis as the standard approach." Staff's Opening Comments at 6. PGE supports Staff's position. It provides

the flexibility needed to adapt to changing circumstances and it ties environmental scoring to the IRP analysis process, which incorporates input from parties to the relevant docket.

**B. The Commission Does Not Need an Arbitrary and Prescriptive Requirement for Ensuring That the Selection of Bids Is Consistent With the IRP**

PGE disagrees with the proposal of CUB, et al., for how to proceed if bids or other updated information are significantly different from the original IRP inputs. *See* Opening Comments of CUB, et al., at 3-4. CUB, et al., state that if the average bids in the initial short list for each resource are more than 20% above or below those modeled in the original IRP, the utility would then re-run the modeling used in the IRP and provide sufficient time and opportunity to the public to seek and analyze data. *Id.* at 4. CUB, et al., acknowledge that this will require a more lengthy process than contemplated in the Staff's proposal as it will require data requests, including requests to run sensitivities. *Id.*

PGE agrees that a utility should take into account any changes in the market that produce unexpected RFP results. However, PGE objects to setting an arbitrary percentage which would trigger what is essentially a redo of the IRP. Staff's proposal requires that the portfolio modeling and decision criteria used to select the final short-list of bids be consistent with the modeling and decision criteria used to develop the utility's IRP action plan. This provides the utility with the flexibility to respond to favorable changes in the market so long as they are consistent with the modeling and decision criteria used in the IRP. If the RFP produces unexpectedly high or low results, the utility may in fact choose to redo its IRP. The fact is that at the end of the day, the burden is on the utility to produce a short-list of RFP resources that the Commission will be comfortable acknowledging. The utility has incentive enough to ensure that its proposed

resources are consistent with its IRP. The Commission does not need to impose arbitrary and prescriptive requirements for evaluating resources.

**C. An IE’s Access to Models Must be Consistent With Licensing and Other Contractual or Legal Requirements**

In its Opening Comments, Staff states that “[i]f the RFP requires an Independent Evaluator, then the IE must have full access to the utility’ production cost and risk models.” Staff’s Opening Comments at 6. This requirement is included in Section 8(c) of Staff’s Straw Proposal. Idaho Power commented that certain licensing obligations that Idaho Power has with its computer software vendors may prevent access of an independent evaluator to the Company’s production cost and risk models and other analytical tools. Idaho Power Opening Comments at 5. PGE has similar concerns. Accordingly PGE proposes that the last sentence of Section 8b of Staff’s Straw Proposal be revised to read as follows: “If an IE is used, then the IE will have full access to the utility’s production cost and risk models, subject to any licensing or other contractual or legal restrictions governing access to such models.”

**D. Debt Imputation**

Staff recommends that debt imputation “should be reserved for the selection of the final bids from the initial short-list of bids.” Staff’s Opening Comments at 6, Attachment B at 2. However, leverage affects the cost of capital or it does not. Either it should be a factor for evaluating resources that will result in the best combination of expected costs and associated risks and uncertainties or it should not. Staff does not support *why* consideration of the impact of leverage on the cost of capital should be reserved for selection of final bids from the short-list.

PGE believes that debt imputation or leverage should be considered in the evaluation of bids (and Benchmark resources, if relevant) prior to selection of a short list. Otherwise the process could result in an “incorrect” short list. For example, a first bid that would result in debt imputation might appear to be \$1 per MWh cheaper than a second bid that would not. However, if consideration of debt imputation would increase the cost of the first bid by \$2 per MWh, then Staff’s proposal might include the first bid on the short list, but not the second, even though the first bid is really \$1 per MWh more expensive. This would then preclude final resource actions that result in the best combination of expected costs and associated risks and uncertainties for customers. Therefore the cost of debt imputation should be considered for all proposals that are being considered for short listing. Accordingly, PGE suggests that item (8)(c) be rewritten as “Debt imputation should be considered for all bids whose scores qualify them for short list consideration.”

In its Opening Comments, Staff advocates that “[t]he utility should be willing to obtain an advisory opinion from a ratings agency to substantiate its analysis and final decision, if requested by the Commission.” Staff’s Opening Comments at 6-7. PGE believes that it is unlikely that a ratings agency would be willing to provide an opinion regarding the leverage impact of a single resource action by the utility, as the ultimate credit quality and rating of the utility is based on a multiplicity of factors. Ratings agencies have presented and discussed their logic and methodology for evaluating the leverage and financial risk of utility contract resources in industry publications and other forums. However, it is also clear that the ratings agencies consider imputed debt to be one of many factors that influences the credit profile of the utility.

Accordingly, it seems unlikely that a ratings agency would be willing to issue an advisory opinion related to the utilities credit without performing a broader review of the company's financial results, operations and other external factors. If issued, an advisory opinion would likely be based on many factors – such as the utility's existing balance sheet and other possible resource acquisitions – not simply on the acquisition of one resource in isolation. Given that many factors contribute to ratings agencies' opinions, PGE suggests that when considering debt imputation, the Commission's focus should be on whether the analysis was applied evenhandedly, and not on the opinion of an outside agency.

**E. “Own vs. Rent” Evaluation Criteria Should be Defined at the RFP Development Stage and Should be Used In the Selection of the Short List**

CUB, et al., propose that a discussion of the “whole issue of comparing rented vs. owned resources, including debt imputation” take place in the IRP process. Opening Comments of CUB, et al., at 5. These parties go on to state that they “would then expect that treatment to be incorporated into the scoring and bid evaluation process.” *Id.* PGE agrees with these parties that a discussion of “owning vs. renting” should take place at the IRP stage. However, it should be made clear that defining the evaluation criteria for resource characteristics relevant to the “own vs. rent” question should not occur at the IRP stage, but rather at the RFP development stage. In addition, all elements of the “own vs. rent” issue should be considered in the Benchmark Resource and RFP bid scoring and evaluation procedures which will result in selection of a short list. In particular, evaluation of possible debt imputation characteristics should occur in the process of selecting the short list, rather than being restricted to the selection of final bids from the initial short list. *See* discussion on Debt Imputation, *infra*.

## **9. RFP Design**

### **A. The Commission should adopt purely descriptive terms to describe RFPs**

PacifiCorp contends that “the use of the terms ‘Standard RFP’ .... and ‘Non-Standard RFP’ .... may in fact inappropriately suggest a negative connotation to the marketplace regarding RFPs with utility ownership options.” PacifiCorp’s Opening Comments at 10. PGE agrees with PacifiCorp that more purely descriptive terms should be used, either the “RFP without Benchmark Resource” and “RFP with Benchmark Resource” suggested by PacifiCorp or something similar.

## **13. RFP Process/Analysis**

### **A. Any Proposal Adopted By the Commission Should Contain a Balanced Characterization of the Risks and Advantages of Benchmark Resources**

PGE proposes a more balanced characterization of the “unique risks and advantages” of Benchmark Resources described in Section 13(b)(ii) of Staff’s Straw Proposal. As currently written, this Section characterizes “unique risks and advantages” as “including the regulatory treatment of construction cost overruns, equipment failures and outages, costs of replacement capacity, energy and ancillary services, and other risks and advantages ...” This makes it appear that Benchmark Resources are generally riskier than other resources. However, Benchmark Resources also have a number of advantages that should be considered at the same time. These include the ability to upgrade or expand, possible construction cost savings, and the ability to extend the lives of these resources.

Accordingly, we propose that Section 13(b) (ii) read as follows:

The IE validates the utility’s Benchmark Score and may validate, sample, or independently score all bids, at the discretion of the IE and the Commission. In addition, the IE evaluates the unique risks

and advantages associated with the Benchmark Resource, including the regulatory treatment of construction cost variances (both underages and overages), costs related to equipment performance, and other risks and advantages of the Benchmark Resource to consumers.

## **16. RFP Acknowledgment**

### **A. An RFP Acknowledgement Process Facilitates the Prudent Acquisition of Resources But Does Not Prohibit the Commission From Disallowing Costs of Resources in Future Ratemaking Proceedings**

ICNU questions the possibility of a fair RFP process and therefore recommends that “the Commission proceed cautiously when deciding to limit its future discretion, and decline to insert itself into the competitive bidding process by acknowledging its results or ruling on the RFP’s fairness outside of a rate proceeding.” ICNU’s Opening Comments at 10. ICNU is concerned that by acknowledging an RFP, the Commission will unduly limit its ability to disallow the costs associated with resources acquired through an RFP process. *Id.* at 8. PGE believes that ICNU is misreading Staff’s proposal which limits Commission acknowledgement to the final RFP short-list. Under Staff’s Straw Proposal, the Commission does not have the authority to acknowledge any specific resource, and therefore would retain full discretion to either allow or disallow the costs of any particular resource in a future rate proceeding.

Further, Staff’s proposal states that “[a]cknowledgment shall have the same meaning as assigned to that term in OPUC Order 89-507.” Staff Proposal at Section 16. Order 89-507 makes it clear that while acknowledgment may be evidence in support of favorable rate-making treatment, it is not a *guarantee* of favorable treatment. *See, In the Matter of the Investigation into Least-Cost Planning for Resource Acquisitions by Energy Utilities in Oregon*, OPUC

Docket UM 180, Order No. 89-507 at 7 (Apr. 20, 1989)(emphasis added). Thus, in any subsequent rate proceeding, the Commission retains the discretion to disallow the costs of resources which are not prudent.

PGE agrees with Staff that “an RFP acknowledgement process will improve future prudence reviews and provide an additional layer of regulatory certainty to the utility.” Staff’s Opening Comments at 9. The acknowledgement process encourages all parties to air concerns about any proposed resource acquisition *before* the utility commits to the resource. It therefore plays an important role in facilitating the acquisition of resources that will result in the best combination of expected costs and associated risks and uncertainties for customers. PGE urges the Commission to adopt Staff’s proposal with regard to Commission acknowledgement of RFPs.

### **Conclusion**

PGE respectfully requests that the Commission adopt Staff’s Straw Proposal submitted as Attachment A to Staff’s Opening Comments with the changes proposed by PGE in our Opening and Reply Comments.

DATED this 21<sup>st</sup> day of October, 2005.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing REPLY COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY to be served by electronic and U.S. Mail upon each party on the attached official service list in this proceeding.

Dated at Portland, Oregon, this 21<sup>st</sup> day of October, 2005.

/s/ J. RICHARD GEORGE\_\_\_\_\_

J. Richard George

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