



September 8, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97301

**Re: Docket No. UE 374 - In the Matter of PACIFICORP, dba PACIFIC POWER,
Request for a General Rate Revision.**

Enclosed for filing in the above-caption docket please find the Supplemental Sierra Club Cross-Examination Exhibits (725-734). The Confidential versions of the Cross-Examination Exhibits will be served in accordance with OAR 860-001-0070(3) and the Commission's Covid-19 Response outlined in Order 20-088 on all eligible party representatives electronically via encrypted password protected ZIP folders

If you have any questions or require any additional information, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "AMB", is positioned above the typed name.

Ana Boyd
Research Analyst
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612
415-977-5649
ana.boyd@sierraclub.org

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

Request for a General Rate Revision

UE 374

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of September, 2020, I have served the foregoing Sierra Club Supplemental Cross-Examination Exhibits upon all party representatives on the official service list for this proceeding. The public version of these documents was served upon parties via email, and the confidential version of these documents was served pursuant to General Protective Order No. 20-040 upon all eligible party representatives electronically via encrypted password protected ZIP folders.

PACIFICORP

Etta Lockey (C)
Matthew McVee (C)
825 NE Multnomah St, Ste. 2000
Portland, OR 97232
etta.lockey@pacificorp.com
matthew.mcvee@pacificorp.com
oregondockets@pacificorp.com

STAFF

Marianne Gardner (C)
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088
marianne.gardner@state.or.us

Sommer Moser (C)
PUC Staff - Department Of Justice
1162 Court St. NE
Salem, OR 97301
sommer.moser@doj.state.or.us

AWEC

Brent Coleman (C) (HC)
Tyler C Pepple (C) (HC)
Davison Van Cleve, PC
1750 SW Harbor Way, Ste 450
Portland, OR 97201
blc@dvclaw.com
tcp@dvclaw.com

OREGON CITIZENS UTILITY BOARD

Robert Jenks (C) (HC)
Michael Goetz (C) (HC)
610 SW Broadway, Ste 400
Portland, OR 97205
bob@oregoncub.org
mike@oregoncub.org
dockets@oregoncub.org

KWUA & OFBF

Paul S Simmons (C) (HC)
Somach Simmons & Dunn, PC
500 Capitol Mall, Ste.1000
Sacramento, CA 95814
psimmons@somachlaw.com

Crystal Rivera (C) (HC)
Somach Simmons & Dunn
500 Capitol Mall Ste. 1000
Sacramento CA 95814
crivera@somachlaw.com

Lloyd Reed (C) (HC)
Reed Consulting
10025 Heatherwood Lane
Highlands Ranch CO 80126
lloyd.reed@lloydreedconsulting.com

CALPINE SOLUTIONS

Greg Bass
401 West A St., Ste. 500
San Diego, CA 92101
greg.bass@calpinesolutions.com

Gregory M. Adams (C)
Richardson Adams, PLLC
P.O. Box 7218
Boise, ID 83702
greg@richardsonadams.com

Kevin Higgins (C)
Energy Strategies LLC
215 State St, St 200
Salt Lake City, UT 84111-2322
khiggins@energystrat.com

TESLA INC

Bill Ehrlich (C) (HC)
3500 Deer Creek Rd
Palo Alto, CA 94304
wehrlich@tesla.com

Francesca Wahl (C) (HC)
6800 Dumbarton Circle
Fremont, CA 94555
fwahl@tesla.com

Kevin Auerbacher (C) (HC)
601 13th St NW, 9th Fl North
Washington, DC 20005
kauerbacher@tesla.com

John Dunbar (C) (HC)
Dunbar Law LLC
621 SW Morrison St., Ste. 1025
Portland, OR 97205
jdunbar@dunbarlawllc.com

VITESSE LLC

R. Bryce Dalley (C)
Facebook, Inc.
24005 Bertsinger Rd.
Ridgefield, WA 98642
rbd@fb.com

Liz Ferrell (C)
Facebook, Inc.
1 Hacker Way
Menlo Park, CA 94205
eferrell@fb.com

Irion A Sanger (C)
Sanger Law PC
1041 SE 58th Place
Portland, OR 97215
irion@sanger-law.com

CHARGEPOINT INC

Steve Elzinga (C)
Alexandra Leumer (C)
693 Chemeketa St NE
Salem, OR 97301
steve@shermlaw.com
alexandra.leumer@chargepoint.com

Scott Dunbar (C)
Keyes Fox & Wiedman LLP
1580 Lincoln St, Ste 880
Denver, CO 80203
sdunbar@kfwlaw.com

SBUA

Diane Henkels (C)
621 SW Morrison St, Ste 1025
Portland, OR 97205
diane@utilityadvocates.org

William Steele (C)
Bill Steele And Associates, LLP
PO Box 631151
Highlands Ranch, CO 80164
wa.steele@hotmail.com

WALMART

Steve W Chriss (C)
2001 SE 10th St
Bentonville, AR 72716-0550
stephen.chriss@wal-mart.com

Vicki M Baldwin (C)
Parsons Behle & Latimer
201 S Main St, Ste 1800
Salt Lake City, UT 84111
vbaldwin@parsonsbehle.com

FRED MEYER

Justin Bieber (C)
215 South State Street, Ste .200
Salt Lake City, UT 84111
jbieber@energystrat.com

Kurt J Boehm (C)
Jody Kyler Cohn (C)
Boehm Kurtz & Lowry
36 E Seventh Street, Ste. 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

Dated this 8th day of September, 2020 at Redwood City, CA.

/s/ Ana Boyd

Ana Boyd
Research Analyst
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612
ana.boyd@sierraclub.org

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 725

CONFIDENTIAL

Cross-Examination Exhibit

**This exhibit is confidential pursuant to Protective Order 20-040 and
is provided in Excel format.**

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 726

CONFIDENTIAL

Cross-Examination Exhibit

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**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 727

CONFIDENTIAL

Cross-Examination Exhibit

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Docket No. UE 374
Exhibit Sierra Club/728

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 728

Cross-Examination Exhibit

UE 374/PacifiCorp
August 31, 2020
Sierra Club Data Request 12.3

Sierra Club Data Request 12.3

Refer to PAC/3800 at Link/5:6-7:

- (a) Describe, in detail, how after September 2013 the Company continued to monitor natural gas prices.
- (b) Produce any and all records and data comprising this monitoring.

Response to Sierra Club Data Request 12.3

- (a) Please refer to the Company's response to Sierra Club Data Request 7.1, and specifically subpart (a). The Company monitors the fundamentals-based forecast on an ongoing basis relying on multi-client, off-the-shelf, expert forecasting services and published in nominal dollars using PacifiCorp inflation indices. With regard to the September 2013 forecast, monitoring looks at how the broker quotes changed from the previous quarterly market price forecast June 2013, and subsequently how the forecast changed looking at December 2013. Also considered are fundamental changes to the market related to supply and demand. News articles are also monitored for the industry. The Company reviews the electric and gas market prices daily as part of the operations of buying and selling electricity.
- (b) Please refer to the Company's response to Sierra Club Data Request 7.1, and more specifically subpart (b) which provided the available natural gas - forward market data consistent with broker quotes for September 2013 and December 2013.

Docket No. UE 374
Exhibit Sierra Club/729

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 729

Cross-Examination Exhibit

UE 374/PacifiCorp
August 31, 2020
Sierra Club Data Request 12.4

Sierra Club Data Request 12.4

Refer to PAC/3800 at Link/6:3:

- (a) Describe, in detail, how after September 2013 the Company was monitoring actual market forward prices.
- (b) Produce any and all records and data comprising this monitoring.

Response to Sierra Club Data Request 12.4

- (a) Please refer to the Company's response to Sierra Club Data Request 12.3 subpart (a).
- (b) Please refer to Confidential Attachment Sierra Club 12.4.

Confidential information is designated as Protected Information under the protective order in this proceeding and may only be disclosed to qualified persons as defined in that order.

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 730

CONFIDENTIAL

Cross-Examination Exhibit

**This exhibit is confidential pursuant to Protective Order 20-040 and
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**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 731

CONFIDENTIAL

Cross-Examination Exhibit

**This exhibit is confidential pursuant to Protective Order 20-040 and
is provided under separate cover.**

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 732

CONFIDENTIAL

Cross-Examination Exhibit

**This exhibit is confidential pursuant to Protective Order 20-040 and
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**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 733

CONFIDENTIAL

Cross-Examination Exhibit

**This exhibit is confidential pursuant to Protective Order 20-040 and
is provided in Excel format.**

Docket No. UE 374
Exhibit Sierra Club/734

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 734

Cross-Examination Exhibit

UE 374/PacifiCorp
August 31, 2020
Sierra Club Data Request 12.1

Sierra Club Data Request 12.1

Refer to Ralston work paper “CONF Exhibit_PAC_2603_CONF and WPs.xlsx”, tab “October 2013 Mine Plan,” lines 60 and 61 (“External Coal”) and (“Delivered / Coal Inventory Changes”):

- (a) Identify the source of the information used here, including date produced or provided to the Company, and context.
- (b) Provide the source of the information used here, in its full unredacted form.

Response to Sierra Club Data Request 12.1

- (a) The source documents for million British thermal units (MMBtus) in the “October 2013 Mine Plan” tab are as follows:
 - Row 60 – See Confidential Attachment Sierra Club 12.1-1, external MMBtus
 - Row 62 – See Confidential Attachment Sierra Club 12.1-2, Jim Bridger plant total MMBtus consumed

Line 60 represents third-party MMBtus received at the Jim Bridger Plant in the October 2013 Business Plan. Row 62 represents total Jim Bridger plant MMBtus consumed in the January 2013 Long-Term Plan. Line 61 is derived by subtracting MMBtus received from Bridger Coal and external sources from the total Jim Bridger plant consumed requirement. Line 61 aligns MMBtus in the January 2013 Long-Term Plan and the October 2013 Business Plan to ensure that a comparable and accurate analysis could be performed.

In reference to the workpaper cited above, a coal inventory adjustment is required in both the January 2013 and October 2013 analyses.

The date produced was fall of 2013.

- (b) Refer to response 12.1 (a).

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