



**SOMACH SIMMONS & DUNN**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW

500 CAPITOL MALL, SUITE 1000, SACRAMENTO, CA 95814  
OFFICE: 916-446-7979 FAX: 916-446-8199  
SOMACHLAW.COM

July 24, 2020

***Via Electronic Filing***

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

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

Dear Filing Center:

Please find enclosed a letter to the Public Utility Commission of Oregon on behalf of the Klamath Water Users Association (KWUA) and the Oregon Farm Bureau (OFB) regarding KWUA/OFB's decision not to submit Rebuttal Testimony in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

Paul Simmons  
Counsel for Intervenors KWUA and OFB  
[psimmons@somachlaw.com](mailto:psimmons@somachlaw.com)  
OSB 971386

Enc.



500 CAPITOL MALL, SUITE 1000, SACRAMENTO, CA 95814  
OFFICE: 916-446-7979 FAX: 916-446-8199  
SOMACHLAW.COM

July 24, 2020

***Via Electronic Filing***

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

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

Dear Public Utility Commission of Oregon:

On June 4, 2020, intervenor Klamath Water Users Association (KWUA) sponsored and submitted to the Commission the reply testimony of Mr. Lloyd C. Reed in the above-captioned proceeding. Following the submittal of this testimony, the Oregon Farm Bureau (OFB) intervened in the proceeding and is participating jointly with KWUA, and also sponsors Mr. Reed's testimony

Until recently, KWUA and OFB intended to submit rebuttal testimony in this proceeding in order to address certain rate spread and rate design issues as they relate to PacifiCorp's Schedule 41 irrigation/drainage tariff. However, KWUA/OFB have been participating in settlement discussions with other parties to the proceeding and it is currently our understanding that the parties – including PacifiCorp and Commission Staff – have developed a settlement in principle regarding certain rate spread/rate design issues of concern to KWUA and OFB.

Therefore, given these developments, KWUA and OFB will not be submitting rebuttal testimony in this proceeding. However, should the terms and conditions of the rate spread/rate design settlement in principle not be finalized in the form of a written stipulation agreement that fully preserves the agreed-to points regarding the Schedule 41 irrigation/drainage tariff, KWUA and OFB reserve the right to actively participate in the later phases of this proceeding. More generally, KWUA and OFB reserve all rights not explicitly foregone by non-submittal of rebuttal testimony.

Sincerely,

Paul Simmons  
Counsel for Intervenors KWUA and OFB  
[psimmons@somachlaw.com](mailto:psimmons@somachlaw.com)  
OSB 971386