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Portland, OR 97201

September 16, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
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 the Motion to Admit Pre-filed Testimony and Exhibits of the Alliance of Western Energy Consumers in the above-referenced docket.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

| <u>Exhibit</u> | <u>Description</u> |
|--------------------------|--|
| AWEC/202 | Rate of Return |
| AWEC/203 | Valuation Metrics |
| Confidential AWEC/204 | Capital Structure |
| AWEC/205 | Proxy Group |
| AWEC/206 | Consensus Analysts' Growth Rates |
| AWEC/207 | Constant Growth DCF Model (Consensus Analysts' Growth Rates) |
| AWEC/208 | Payout Ratios |
| AWEC/209 | Sustainable Growth Rates |
| AWEC/210 | Constant Growth DCF Model (Sustainable Growth Rate) |
| AWEC/211 | Electricity Sales are Linked to U.S. Economic Growth |
| AWEC/212 | Multi-Stage Growth DCF Model |
| AWEC/213 | Common Stock Market/Book Ratio |

| <u>Exhibit</u> | <u>Description</u> |
|--------------------------|--|
| AWEC/214 | Equity Risk Premium – Treasury Bond |
| AWEC/215 | Equity Risk Premium – Utility Bond |
| AWEC/216 | Bond Yield Spreads |
| AWEC/217 | Treasury and Utility Bond Spreads |
| AWEC/218 | Value Line Beta |
| AWEC/219 | CAPM Return |
| AWEC/220 | Standard & Poor’s Credit Metrics |
| AWEC/221 | Bulkley’s Revised Constant Growth DCF |
| AWEC/222 | Bulkley’s Revised Multi-Stage Growth DCF Model |
| AWEC/223 | Accuracy of Interest Rate Forecasts |
| Confidential AWEC/300 | Confidential Opening Testimony of Lance D. Kaufman (Revised on 8/31/2020) |
| AWEC/301 | Curriculum Vitae of Lance D. Kaufman |

| <u>Exhibit</u> | <u>Description</u> |
|--------------------------|---|
| AWEC/302 | PacifiCorp Responses to Data Requests |
| AWEC/303 | Summary of Cost of Service Study Adjustments |
| AWEC/304 | Cost of Service Study With All Adjustments |
| Confidential AWEC/305 | Kiewit Decommissioning Study Adjustments |
| Confidential AWEC/306 | Jim Bridger and Hunter Pollution Control Analysis |
| AWEC/307 | AMI Rollout Retired Meter Net Plant Amounts |
| AWEC/400 | Rebuttal and Cross-Answering Testimony of Lance D. Kaufman on Coal Decommissioning Costs and Independent Evaluator Report |
| Confidential AWEC/500 | Confidential Rebuttal Testimony of Lance D. Kaufman |
| Confidential AWEC/501 | Confidential PacifiCorp Responses to Data Requests |
| AWEC/502 | Excerpt of AWEC Opening Testimony in UM 1662 |
| Confidential AWEC/503 | Revised AWEC Adjustments to Kiewit Decommissioning Report |
| AWEC/504 | AWEC Summary of PacifiCorp Response to AWEC DR 100 |

| <u>Exhibit</u> | <u>Description</u> |
|--------------------------|--|
| AWEC/600 | Rebuttal Testimony of Michael P. Gorman |
| AWEC/601 | Gorman Recommended Rate of Return (Page 1); Gorman Proposed Capital Structure (Page 2) |
| AWEC/602 | Standard & Poor's Credit Metrics |
| AWEC/603 | Major Rate Case Decisions (Pages 1-2); Treasury and Utility Bond Yields (Page 3) |
| Confidential AWEC/700 | Confidential PacifiCorp Response to AWEC Data Request No. 57, plus Attachments |
| AWEC/701 | PacifiCorp Response to AWEC Data Request No. 123 |
| AWEC/702 | PacifiCorp Response to AWEC Data Request No. 157 |
| AWEC/703 | PacifiCorp Response to AWEC Data Request No. 158 |
| AWEC/704 | PacifiCorp Response to AWEC Data Request No. 159 |
| Confidential AWEC/705 | Confidential PacifiCorp Response to AWEC Data Request No. 160, plus Attachments AWEC 160-1, AWEC 160-2, AWEC 160-4, and AWEC 160-5 |
| Confidential AWEC/706 | Confidential OPUC Response to AWEC Data Request No. 1 |
| Confidential AWEC/707 | Confidential OPUC Response to AWEC Data Request No. 2 |

| <u>Exhibit</u> | <u>Description</u> |
|----------------|---|
| AWEC/708 | New York Times Article Regarding Interest Rates (Aug. 27, 2020) |

The Declarations of Michael P. Gorman and Lance D. Kaufman attesting to the truth and accuracy of their testimony and exhibit filings are attached.

Dated this 16th day of September, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

| | | |
|--------------------------------------|---|------------------|
| In the Matter of |) | |
| |) | DECLARATION OF |
| PACIFICORP dba PACIFIC POWER, |) | LANCE D. KAUFMAN |
| |) | |
| Request for a General Rate Revision. |) | |
| _____ |) | |

I, LANCE D. KAUFMAN, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Lance D. Kaufman. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers (“AWEC”) in this matter.

2. On behalf of AWEC, I sponsored pre-filed testimony and exhibits in this proceeding (AWEC/300-307, AWEC/400, and AWEC/500-504). In addition, I am adopting the pre-filed testimony and exhibits of Bradley G. Mullins filed on behalf of AWEC in this proceeding (AWEC/100-103).

3. To the best of my knowledge, the above-mentioned pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 16 day of September, 2020.



LANCE D. KAUFMAN

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

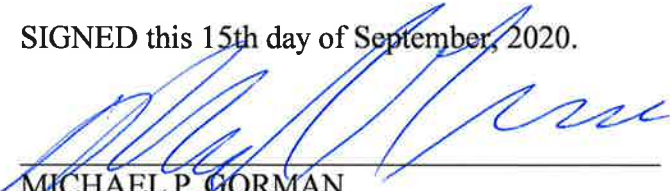
UE 374

| | | |
|--------------------------------------|---|-------------------|
| In the Matter of |) | |
| |) | |
| PACIFICORP dba PACIFIC POWER, |) | DECLARATION OF |
| |) | MICHAEL P. GORMAN |
| Request for a General Rate Revision. |) | |
| _____ |) | |

I, MICHAEL P. GORMAN, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Michael P. Gorman. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers (“AWEC”) in this matter.
2. On behalf of AWEC, I sponsored pre-filed testimony and exhibits in this proceeding (AWEC/200-223 and AWEC/600-603).
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 15th day of September, 2020.



MICHAEL P. GORMAN