



August 4, 2020

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Public Utility Commission of Oregon
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**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 Motion for Leave to Supplement Dr. Jeremy Fisher's Rebuttal Testimony and the Supplemental Rebuttal Testimony of Dr. Jeremy Fisher (600-602). The Confidential version of the supplemental rebuttal testimony 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".

Ana Boyd
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**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 4th day of August, 2020, I have served the foregoing Motion for Leave to Supplement Dr. Jeremy Fisher's Rebuttal Testimony and the Supplemental Rebuttal Testimony of Jeremy Fisher upon all party representatives on the official service list for this proceeding. The public version of this document was served upon parties via email, and the confidential portions of this document were served pursuant to Protective Order No. 20-040 upon all eligible party representatives electronically via encrypted password protected ZIP folders.

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Dated this 4th day of August, 2020 at Redwood City, CA.

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

In the Matter of
PACIFICORP d/b/a PACIFIC POWER,
Request for a General Rate Revision

MOTION FOR LEAVE TO
SUPPLEMENT DR. JEREMY FISHER'S
REBUTTAL TESTIMONY

I. Introduction

Sierra Club submits this motion for leave to supplement the testimony of Dr. Jeremy Fisher (600) in the above-referenced proceeding. Good cause exists because, due to no fault of its own, Sierra Club did not receive important information on which the supplemental testimony is based until July 27th, 2020, four days after Sierra Club filed its rebuttal testimony.

II. Good Cause Exists to Grant Sierra Club's Motion to File Supplemental Testimony

On June 30, 2020 Sierra Club submitted data request 8.2 seeking Mr. Link's work papers in support of a PVRR sensitivity analysis for potential transmission needs under various Bridger coal plant operational scenarios in addition to a series of questions on the same topic. In its response, provided July 8, 2020, the Company both failed to provide correct work papers, the subject of request 8.2(m), and an inaccurate response to a confirm/deny question in 8.2(d). On July 23, Sierra Club understood that the provided work papers were incorrect, and requested that PacifiCorp provide the correct work papers, pursuant to the request. Sierra Club timely filed its rebuttal testimony on July 24, 2020, relying in part on PacifiCorp's response provided in 8.2(d).

On July 27, PacifiCorp provided the correct work papers, from which it was readily apparent that the Company's response to 8.2(d) was inaccurate.

As an overarching matter, it is important that all testimony reflect accurate information. But as it stands, an aspect of Dr. Fisher's rebuttal testimony is based on a faulty Company response to a data request. Specific to this case, in Dr. Fisher's July 24 rebuttal testimony, he addressed a statement made by Mr. Link in which Mr. Link sought to explain that in 2013, PacifiCorp had assessed a sensitivity where new transmission projects were avoided in conjunction with SCR retrofit or gas repower decision at Jim Bridger 3 & 4. Relevant to that question, Sierra Club requested the work papers associated with that specific assessment, and issued a series of inquiries on the nature of the assessment. The Company provided incorrect work papers, and provided an incorrect response to one of the inquiries on the assessment, formulated as a request for confirmation or denial. In that inquiry, marked 8.2(d), Sierra Club sought to understand whether the removed transmission in Mr. Link's scenario included multiple lines, or just a single sub-segment relevant to Jim Bridger. The Company's response to 8.2(d) indicated that the Company had only examined the removal of a sub-segment of transmission.

Dr. Fisher's rebuttal on this issue relied on the Company's response to 8.2(d), and did not have the benefit of the correct work papers. In reviewing the corrected work papers provided July 27th, Dr. Fisher learned that the response to 8.2(d) was incorrect, and in fact the sensitivity had removed all new transmission projects, not just the sub-segment implied by 8.2(d). Dr. Fisher quickly drafted supplemental testimony accurately reflecting his expert opinion on the new information. Therefore, based on the new information, Sierra Club requests leave to file Dr. Fisher's short supplemental testimony limited to the issues described above.

III. Conclusion

For the foregoing reasons, Sierra Club respectfully requests leave to supplement the testimony of Dr. Fisher in the docket.

Dated: August 4, 2020

Respectfully submitted,

/s/ Gloria D. Smith

Gloria D. Smith (*pro hac vice*)

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Docket No. UE 374
Exhibit Sierra Club/600
Witness: Jeremy Fisher

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF OREGON**

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Request for a General Rate Revision.

UE 374

**Supplemental Rebuttal Testimony of
Jeremy Fisher, PhD**

**On Behalf of
Sierra Club**

Public Version

August 4, 2020

LIST OF TABLES AND FIGURES

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LIST OF EXHIBITS

Sierra Club/601	PacifiCorp Response to Sierra Club Data Request 8.2 – 1st Revised.
Sierra Club/602	Confidential attachment to PacifiCorp Response to Sierra Club 8.2, 1st Revised (excerpt)

1 **Q Are you the same Jeremy I. Fisher who provided opening and rebuttal**
2 **testimony in this docket on behalf of Sierra Club?**

3 **A** Yes, I am.

4 **Q Why do you need to supplement your rebuttal testimony?**

5 **A** In my July 24 rebuttal testimony, I addressed a statement made by Mr. Rick Link
6 in which he sought to explain that in 2013—prior to the implementation of the
7 SCR projects—PacifiCorp had assessed the opportunity to avoid new proposed
8 transmission if the SCR projects at Jim Bridger 3 & 4 were not built and the
9 plants retired instead. My rebuttal on this issue was based on the Company’s
10 discovery responses. However, the Company provided incorrect workpapers¹
11 associated with that assessment, only providing the correct workpapers after
12 Sierra Club filed my rebuttal, on July 27, 2020.²

13 The late-arriving workpapers demonstrated that a key discovery response from the
14 Company was incorrect, and that Mr. Link’s claim that the Company assessed
15 avoided transmission associated with the retirement of Jim Bridger in this specific
16 scenario was also incorrect. It is important that the record be clear on the nature of
17 the assessment at the time, rather than the mischaracterization implied by Mr.
18 Link’s testimony.

¹ In the initial version of the PacifiCorp Response to Sierra Club Data Request 8.2, PacifiCorp provided workpapers for a Bridger retirement assessment as discussed by Mr. Link in ERRATA PAC/2300 at Link/16:2 and presented in Table V3.12 of the 2013 IRP, Confidential Volume III. These papers were irrelevant to the transmission sensitivity study that was the subject of Sierra Club’s data request.

² PacifiCorp Response to Sierra Club Data Request 8.2 – 1st Revised (attached as Exhibit Sierra Club/601).

1 **Q Which Company sensitivity assessment are you referring to?**

2 **A** In June 25 reply testimony, Mr. Link referred to a concern raised by Staff in this
3 case, and originally raised by Sierra Club in the Wyoming³ and Utah⁴ pre-
4 approval cases prior to the construction of the SCRs at Jim Bridger 3 & 4, as well
5 as before this Commission in consideration of the 2013 IRP by both Staff⁵ and
6 Sierra Club.⁶ At that time, Sierra Club had argued that the Company failed to
7 assess if avoiding certain elements of the proposed Energy Gateway transmission
8 projects would be a benefit to a scenario in which Jim Bridger 3 & 4 were retired,
9 rather than retrofit with SCRs. Mr. Link addressed this specific concern, stating
10 “Sierra Club also raised this issue in the Utah and Wyoming pre-approval cases,
11 where it argued that Energy Gateway transmission costs should be considered a
12 benefit to early retirement outcomes.”⁷ Importantly, Mr. Link indicated that the
13 Company understood and responded to Sierra Club’s specific concern—that the
14 *retirement* of two Jim Bridger units would allow the Company to avoid *specific*
15 transmission expenditures, and thus specifically be a benefit to the case in which
16 Jim Bridger is retired, rather than retrofit with SCRs—and that case *only*.

³ *In The Matter of the Application of Rocky Mountain Power for Approval of a Certificate of Public Convenience and Necessity to Construct Selective Catalytic Reduction Systems on Jim Bridger Units 3 and 4 Located Near Point of Rocks, Wyoming* Docket No.20000-418-EA-12. (Wyo. Pub. Serv. Comm’n Aug. 2012).

⁴ *In The Matter of: the Voluntary Request of Rocky Mountain Power for Approval of Resource Decision to Construct Selective Catalytic Reduction Systems on Jim Bridger Units 3 and 4*, Docket No. 12-035-92. (Utah Pub. Serv. Comm’n Aug.2012).

⁵ *See In the Matter of PacifiCorp, dba Pacific Power, 2013 Integrated Resource Plan*, Docket No. LC 57, Staff’s Final Comments, at 2, Appendix A at 38 (referring to an October 28, 2013 set of requests to PacifiCorp on the design of a coal fleet assessment “includ[ing] transmission implications of each alternative”).

⁶ *See In the Matter of PacifiCorp, dba Pacific Power, 2013 Integrated Resource Plan*, Docket No. LC 57, Sierra Club Final Comments, at 5-6 (Ore. P.U.C. Jan. 10, 2014).

⁷ PAC/2300 at Link/16:8-11.

1 Mr. Link went on to explain that

2 In response to Sierra Club's concern, the Company conducted a
3 sensitivity study that removed the Energy Gateway transmission
4 investments and Wyoming wind resources that were able to
5 interconnect because of Energy Gateway from both the SCR and
6 gas conversion alternative model runs. The sensitivity resulted in a
7 PVRR(d) of \$230 million favorable to the SCR.”⁸

8 For the purposes of this supplemental testimony, I'll refer to Mr. Link's purported
9 sensitivity as the “transmission sensitivity.”

10 **Q Was Mr. Link's transmission sensitivity study responsive to Sierra Club's**
11 **concern, as Mr. Link stated?**

12 **A** No. Not at all. In my July 24 rebuttal testimony, I testified that because the
13 Company removed the Energy Gateway transmission investments from *both* the
14 SCR and gas conversion alternative model runs, this meant that the transmission
15 sensitivity could not have assessed avoidable transmission associated with only
16 the case that the SCRs were not installed. Indeed, the fact that Mr. Link's
17 sensitivity assessed the gas conversion alternative rather than an early retirement
18 alternative makes it clear that the sensitivity was not directed at actually
19 answering Sierra Club's concern.

20 **Q What did you learn from the Company's late-provided workpapers?**

21 **A** Based on my long history with this project and the Company's various
22 assessments, I had initially understood that the Company's transmission
23 sensitivity was a far more blunt instrument than implied by Mr. Link, removing
24 far more transmission than just the segment than might be avoided by the early

⁸ PAC/2300 at Link/16:12-17.

1 retirement of two Jim Bridger units. To verify this initial understanding, Sierra
2 Club issued discovery seeking to verify that the transmission sensitivity excluded
3 more Energy Gateway segments than just the segment between the Jim Bridger
4 substation (a proposed station called “Anticline”) and the next major substation to
5 the west in Idaho, called Populus.⁹ The Company denied the discovery request
6 (without explanation),¹⁰ implying that Mr. Link’s scenario was highly surgical,
7 just excising the short segment of new transmission that would otherwise carry
8 generation both from Jim Bridger coal plant and the new proposed wind projects
9 in Wyoming.

10 However, the July 27 workpapers revealed two important findings. First, the
11 transmission sensitivity did not look at the benefit of avoided transmission to the
12 Jim Bridger 3 & 4 retirement scenario at all, in contrast to Mr. Link’s implication.
13 Second, the transmission sensitivity was not specific to Bridger-related
14 transmission; rather it simply excluded all future transmission projects throughout
15 the PacifiCorp system. As such, it was not responsive to Sierra Club’s concerns
16 regarding Jim Bridger and was misrepresented by Mr. Link in testimony.

17 **Q How do the July 27 workpapers uniquely demonstrate that the Company did**
18 **not look at a benefit of avoided transmission to the Jim Bridger 3 & 4**
19 **retirement, as implied by Mr. Link?**

20 **A** While Mr. Link implies that the Company assessed avoided transmission as a
21 benefit to a Jim Bridger 3 & 4 retirement scenario, the Company did not make

⁹ Sierra Club/403, Sierra Club Data Request 8.2(d) (included in PacifiCorp Response to Sierra Club Data Request 8.2).

¹⁰ Sierra Club/403, PacifiCorp Response to Sierra Club Data Request 8.2(d).

1 clear in testimony which types of scenarios were being compared. The
2 workpapers for the transmission sensitivity compare two scenarios—one with and
3 one without SCRs—to derive a “PVRR(d)” value of the SCRs.¹¹ One of the two
4 scenarios assesses the cost of the system with Jim Bridger 3 & 4 retrofit with
5 SCRs, while in the other scenario Jim Bridger 3 & 4 are converted to gas; the
6 same scenarios the Company presents in its “base case.” Rather than looking at
7 avoidable transmission as a potential benefit of not maintaining the Jim Bridger
8 coal plant, the scenarios are *both* run without additional transmission. And
9 because PacifiCorp does not assess a scenario in which Jim Bridger 3 & 4 are
10 retired and incremental transmission avoided, there is no assessment of the benefit
11 of avoided transmission to a retirement scenario.

12 **Q How do the July 27 workpapers demonstrate that the transmission sensitivity**
13 **did not assess only avoidable Bridger-related transmission?**

14 **A** The July 27 workpapers show that both scenarios—i.e. the case in which Bridger
15 is retrofit, and the case in which it is converted to gas—removed nearly every
16 future transmission project,¹² not just the projects directly related to Jim Bridger.
17 Both Sierra Club and Staff identified that PacifiCorp failed to assess avoidable
18 transmission as a benefit of Jim Bridger 3 & 4 retirement. The workpapers show

¹¹ Confidential attachment to PacifiCorp Response to Sierra Club 8.2, 1st Revised “Exhibit 5R and Sensitivities_PVRR, CONF.xlsx,” tab “Sensitivity - PVRR Tables.” The gas conversion of Jim Bridger 3 & 4 is called “gas fueled operation” (the referenced tab is attached as Exhibit Sierra Club/602).

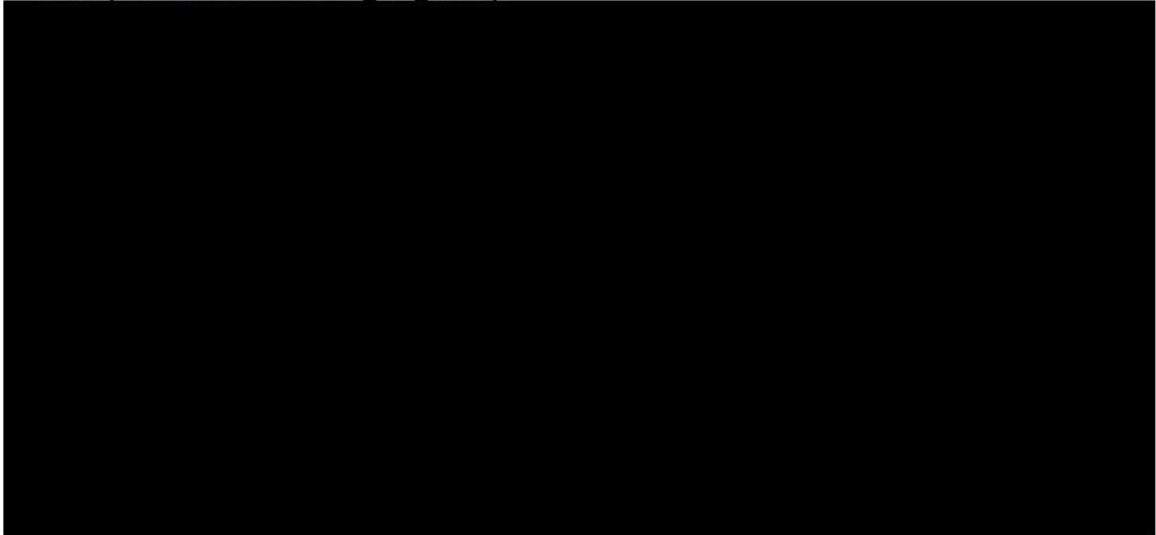
¹² *Id.* Transmission scenario in the alternative scenario is called “EG1,” referential to a transmission buildout scenario discussed in the 2013 Integrated Resource Plan which builds only the Mona-Oquirrh-Terminal in central Utah, and Sigurd-Red Butte segment in southern Utah. See PacifiCorp, *2013 Integrated Resource Plan*, Volume II, at 153, Table K.1 (Apr. 30, 2013), available at <https://edocs.puc.state.or.us/efdocs/HAA/lc57%28lc-57%202013%20irp%20%284-30-13%29.pdf%29haa94014.pdf>.

1 that this critique remains accurate: the Company never assessed the value of
2 avoiding new transmission specifically due to the retirement of Jim Bridger 3 & 4.

3 **Q Which new transmission segments or projects were assumed in PacifiCorp’s**
4 **“base case” underlying the Company’s valuation of the Bridger SCRs?**

5 **A** In its core modeling seeking to support the Bridger SCRs, the Company assumed
6 thirteen new transmission segments, built between 2011 and 2022, at a total cost
7 of more than [REDACTED] (see Confidential Table 1, below).

8 **Confidential Table 1. New transmission projects assumed in SCR base**
9 **case (avoidable cases highlighted)¹³**



10

11 **Q Of those transmission projects, which ones should have been considered**
12 **avoidable under the case that two units at Jim Bridger were retired?**

13 **A** The two projects that could have been considered avoidable are the [REDACTED] and
14 [REDACTED] segments connecting Jim Bridger to points west, in this case originating at
15 “BridgerEast” and terminating at “PathCSouth,” at a capital cost of [REDACTED]

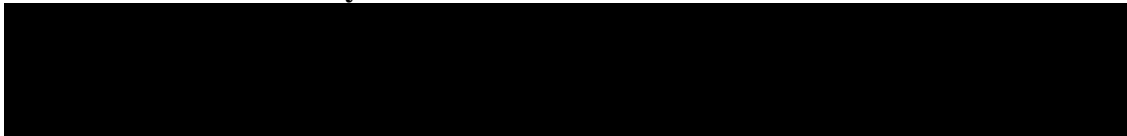
¹³ Confidential Jim Bridger 3 & 4 workpapers supporting the Direct Testimony of Rick Link on Behalf of PacifiCorp, SO Inputs and Outputs for Base Gas, Base CO2 (Coal Outputs) “TieBuild-C_M1209_16_OPC.out”.

1 [REDACTED], respectively. These two projects are highlighted in Confidential
2 Table 1, above. At least one of these projects should have been considered
3 avoidable in a Bridger 3 & 4 retirement scenario.

4 **Q How did the transmission buildout differ in Mr. Link’s sensitivity,
5 purportedly run to address Sierra Club’s concern?**

6 **A** Mr. Link’s transmission sensitivity removed *every* transmission segment except a
7 near-term transmission project in southern Utah, Sigurd to Red Butte (from
8 “UtahNorth” to “UtahSouth” in Confidential Table 2, below).

9 **Confidential Table 2. New transmission projects assumed in Link
10 transmission sensitivity¹⁴**



11

12 Because the model removed all other transmission segments, it was also unable to
13 build new lower cost renewables in Wyoming. Therefore this was not a surgical
14 removal of a redundant proposed transmission segment under a specific scenario,
15 but a completely different worldview, and not at all responsive to our own or
16 Staff’s concern.

¹⁴ Confidential “Attach Sierra Club 8.2 1st REVISED CONF” at “TieBuild-C_M1209_16_OPC_EG1.out”
to PacifiCorp Response to Sierra Club Data Request 8.2 – 1st Revised.

1 **Q Mr. Link concluded his discussion of the transmission sensitivity by quoting**
2 **the Utah Commission’s decision in the pre-approval docket before the**
3 **construction of the SCRs. Do you have a response, given what is shown in his**
4 **July 27 workpapers?**

5 **A** Yes. Mr. Link quoted the Utah Commission as follows, and I quote because the
6 words here are critical, as known by Mr. Link:

7 [The] Company’s sensitivity case which retires Bridger Units 3
8 and 4 and cancels certain Energy Gateway transmission
9 investment, and consequential wind resource investment, shows
10 this alternative would be higher cost than the [SCRs].¹⁵

11 It concerns me that Mr. Link would elect to quote the Utah Commission here
12 when he knows that the Utah Commission did not understand his sensitivity. Mr.
13 Link clearly did not run a “sensitivity case which retire[d] Bridger Units 3 and 4
14 *and* cancel[ed] certain Energy Gateway transmission investment.” He also did not
15 run a sensitivity that cancels “certain” Energy Gateway transmission investment;
16 he ran a set of scenarios that canceled *all* of the future Energy Gateway
17 transmission investments.

18 **Q Please summarize why this new information is important**

19 **A** Mr. Link represented that he responded to Staff and Sierra Club’s concern
20 regarding avoided transmission opportunities should Jim Bridger 3 & 4 have been
21 retired. However, a careful read of his July 27 response and the accompanying
22 workpapers shows that his purported sensitivity was not at all responsive to Staff
23 and Sierra Club’s concern. Rather than admitting that the Company had not

¹⁵ PAC/2300 at Link/16:18-21 (emphasis added).

1 reviewed incremental avoidable transmission with the retirement of Jim Bridger,
2 or running a *post hoc* assessment, Mr. Link elected to misrepresent his sensitivity
3 and its purpose, and tout a misunderstanding by the Utah Commission in this
4 matter.

5 **Q Does this conclude your supplemental rebuttal testimony?**

6 **A** Yes.

Docket No. UE 374
Exhibit Sierra Club/601
Witness: Jeremy Fisher

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 601

Exhibit Accompanying the Supplemental Rebuttal Testimony of
Jeremy Fisher

PacifiCorp Response to Sierra Club Data Request 8.2 – 1st Revised

UE 374/PacifiCorp
July 27, 2020
Sierra Club Data Request 8.2 – 1st Revised

Sierra Club Data Request 8.2

Refer to PAC/2300 Link/16:7-18 with respect to the scenarios examining avoided transmission in Energy Gateway.

- (a) Mr. Link states that, with respect to the “Utah and Wyoming pre-approval cases,” and “...in response to Sierra Club’s concern...” Refer to the rebuttal testimony of Mr. Link before the Wyoming Public Service Commission in Docket 20000-418-EA-12, filed March 4, 2013, page 40:4-9, stating “Sierra Club has taken the position that if Jim Bridger 3 and 4 were retired and replaced with a resource located closer to load centers that the need for Energy Gateway transmission investments would be alleviated. Consequently, Sierra Club testifies that deferral of Energy Gateway costs should be considered as a benefit to an early retirement outcome and that this benefit was not captured in the Company’s analysis. Explain how the analytical result, shown at PAC/2300 Link/16:12-17 addresses this specific concern.
- (b) Confirm or deny: The Company did not present this specific analysis in the 2013 IRP or 2013 IRP Update. If denied, provide a citation to where the analysis was discussed or results indicated.
- (c) Confirm or deny: The avoided Energy Gateway scenario was applied to the base case, which included the Jim Bridger SCR retrofits.
- (d) Confirm or deny: The avoided Energy Gateway scenario excluded more Energy Gateway segments than just Anticline to Populus.
- (e) Confirm or deny: PacifiCorp did not assess a scenario in which Jim Bridger 3 & 4 units were retired in 2015/2016 and the Energy Gateway segment from Anticline to Populus (only) was also avoided. If denied, explain.
- (f) Confirm or deny: PacifiCorp did not assess a scenario in which Jim Bridger 3 & 4 units were retired in 2015/2016 and the Energy Gateway project was resized relative to the base case to carry the same amount of Wyoming wind as the base case. If denied, explain.
- (g) Confirm or deny: PacifiCorp did not assess a scenario in which Jim Bridger 3 & 4 units were repowered to gas in 2015/2016 and the Energy Gateway segment from Anticline to Populus (only) was also avoided. If denied, explain.
- (h) Confirm or deny: PacifiCorp did not assess a scenario in which Jim Bridger 3 & 4 units were repowered to gas in 2015/2016 and the Energy Gateway project was resized relative to the base case to carry the same amount of

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

UE 374/PacifiCorp
July 27, 2020
Sierra Club Data Request 8.2 – 1st Revised

Wyoming wind as the base case. If denied, explain.

- (i) Confirm or deny: PacifiCorp did not assess a scenario in which Jim Bridger 3 & 4 units were retired in 2020/2021 and the Energy Gateway segment from Anticline to Populus (only) was also avoided. If denied, explain.
- (j) Confirm or deny: PacifiCorp did not assess a scenario in which Jim Bridger 3 & 4 units were retired in 2020/2021 2016 and the Energy Gateway project was resized relative to the base case to carry the same amount of Wyoming wind as the base case. If denied, explain.
- (k) Confirm or deny: PacifiCorp did not assess a scenario in which Jim Bridger 3 & 4 units were repowered to gas in 2020/2021 and the Energy Gateway segment from Anticline to Populus (only) was also avoided. If denied, explain.
- (l) Confirm or deny: PacifiCorp did not assess a scenario in which Jim Bridger 3 & 4 units were repowered to gas in 2020/2021 and the Energy Gateway project was resized relative to the base case to carry the same amount of Wyoming wind as the base case. If denied, explain.
- (m) Provide the work papers underlying the valuation in PAC/2300 Link/16:12-17 including both scenarios examined to arrive at the difference. Include input and output files from System Optimizer, and any spreadsheets or worksheets used by the Company to process or assess the model outputs from System Optimizer.

1st Revised Response to Sierra Club Data Request 8.2

PacifiCorp's July 8, 2020 response to Sierra Club 8.2, subpart (m), included incorrect work papers. Please refer to the following for a revised response for subpart (m). All other components of the Company's prior response to Sierra Club Data Request 8.2 remain unchanged and valid.

(m) Please refer to Confidential Attachment Sierra Club 8.2 1st Revised.

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.

Docket No. UE 374
Exhibit Sierra Club/602
Witness: Jeremy Fisher

**PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

SIERRA CLUB EXHIBIT 602

CONFIDENTIAL

Exhibit Accompanying the Supplemental Rebuttal Testimony of

Jeremy Fisher

Confidential attachment to PacifiCorp Response to Sierra Club 8.2, 1st
Revised (excerpt)

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