

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER THE PUBLIC UTILITY )	
COMMISSION OF OREGON )	CASE NO. UM 1610
Investigation Into Qualifying Facility )	PHASE II
Contracting and Pricing )	
)	MOTION TO ADMIT TESTIMONY
)	AND EXHIBITS OF THE RENEWABLE
)	ENERGY COALITION, COMMUNITY
)	RENEWABLE ENERGY
)	ASSOCIATION, ONEENERGY, AND
)	OBSIDIAN RENEWABLE, LLC

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The Renewable Energy Coalition, Community Renewable Energy Association, OneEnergy, and Obsidian Renewables, LLC (collectively the “Joint QF Parties”) hereby respectfully move to admit the Joint QF Parties’ Phase II testimony and exhibits. By this motion, the Joint QF Parties move to admit into the record the following testimony and exhibits:

Exhibit: Joint QF Parties/100  
Description: Opening Testimony of Kevin C. Higgins  
Filed: May 22, 2015

Exhibit: Redacted and Confidential Joint QF Parties/101  
Description: Illustrative Capacity Payment Calculation  
Filed: May 22, 2015

Exhibit: Joint QF Parties/200  
Description: Reply Testimony of Kevin C. Higgins  
Filed: August 7, 2015

Exhibit: Joint QF Parties/300  
Description: Commission Staff Response to CREA Data Requests 1.1-1.5  
Filed: September 11, 2015

The attached Affidavit of Kevin C. Higgins attests to the veracity of Joint QF Parties/100, Redacted and Confidential Joint QF Parties/101, and Joint QF Parties/200. The remaining exhibit, Joint QF Parties/300, is attached hereto and consists of Commission Staff’s responses to

data requests regarding the testimony of its witness, Ms. Brittany Andrus. Counsel for Commission Staff communicated that Staff stipulates to admission of Joint QF Parties/300 without cross examination of Ms. Andrus to lay a foundation, and the exhibit is therefore admissible pursuant to OAR 860-001-0540(4).

RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of September 2015.

RICHARDSON ADAMS, PLLC

*/s/ Gregory M. Adams*

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On Behalf of the Joint QF Parties

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER THE PUBLIC UTILITY )	
COMMISSION OF OREGON )	CASE NO. UM 1610
Investigation Into Qualifying Facility )	
Contracting and Pricing )	AFFIDAVIT OF KEVIN C. HIGGINS
_____ )	REGARDING TESTIMONY AND
	EXHIBITS

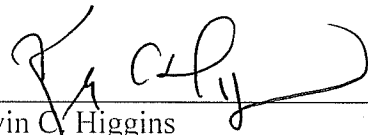
STATE OF UTAH )  
 ) ss.  
County of Salt Lake )

I, Kevin C. Higgins, being first duly sworn on oath, depose and say:

1. My name is Kevin C. Higgins.
2. I am the same Kevin C. Higgins that previously filed the following testimony and exhibits on behalf of the Renewable Energy Coalition, Community Renewable Energy Association, OneEnergy, and Obsidian Renewables, LLC (collectively the “Joint QF Parties”) in Phase II of this proceeding: Redacted and Confidential Joint QF Parties/100-101; Joint QF Parties/200.
3. My pre-filed testimony and exhibits are true and accurate based on my information and belief. If I were to answer those questions today, my responses would be the same.

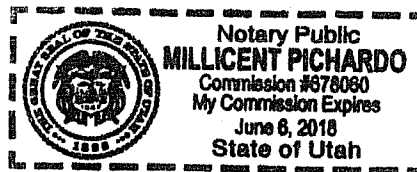
I declare under penalty of perjury under the laws of the state of Utah that the foregoing is true and correct based on my information and belief.

I signed this the 10th day of September 2015.

  
\_\_\_\_\_  
Kevin C. Higgins

SUBSCRIBED AND SWORN to before me this 10 day of September 2015.

Millicent Pichardo  
\_\_\_\_\_  
Notary Public for the State of Utah  
Residing at 1524 S. 700E SLC UT 84105  
My Commission expires June 6, 2018



September 4, 2015

TO: Gregory M. Adams  
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Brian Skeahan  
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FROM: Brittany Andrus  
Energy Resources & Planning Division

**OREGON PUBLIC UTILITY COMMISSION**  
**Docket No. UM 1610**  
**CREA'S First Set of Data Requests to OPUC Staff**  
**Dated August 14, 2015**

**DATA REQUESTS**

1.1 *Reference Staff/700, Andrus/11:2-4, stating in regards to Mr. Kevin Higgins' proposal to provide a sufficiency period capacity adder calculated from the cost of PacifiCorp's proposed coal plant upgrades that "Staff does not think the Commission has authority to include an adder to avoided costs that is not based on real costs the utility will avoid."*

a. *In reply testimony, when asked whether environmental upgrades are "real costs," Mr. Higgins responded: "Yes. PacifiCorp's prudent investments in environmental upgrades have been and will likely continue to be included in rate base to enable the Company to earn a return on and of these investments." Joint QF Parties/200, Higgins/6:1-2. Does Ms. Andrus agree with Mr. Higgins' statement?*

Response: Yes.

b. *If Ms. Andrus does not agree with Mr. Higgins' statement quoted in subpart a., please explain why.*

Response: Not applicable; please see answer to 1.1.a. above.

1.2 *Reference Staff/700, Andrus/11:2-4, stating in regards to Mr. Kevin Higgins' proposal to provide a sufficiency period capacity adder calculated from the cost of PacifiCorp's proposed coal plant upgrades that "Staff does not think the Commission has authority to include an adder to avoided costs that is not based on real costs the utility will avoid."*

Response: For Staff's answer to questions a. through d. below, please see the answer to question 1.1.a. above in addition to the answers below.

a. *Please identify which of PacifiCorp's proposed environmental upgrades listed in Joint QF Parties/100, Higgins/15, and included in Mr. Higgins' proposed capacity adder, would not impose "real costs" to PacifiCorp if completed by PacifiCorp.*

Response: Not applicable.

b. *For any projects that are identified in subpart a., please explain how the project could be completed without imposing real costs on PacifiCorp.*

Response: Not applicable.

c. *For any projects that are identified in subpart a., please explain how these proposed upgrades are any less certain to occur than construction of the next proxy renewable and non-renewable resources identified in PacifiCorp's IRP and utilized in the current deficiency period avoided cost rates.*

Response: Not applicable.

d. *If Ms. Andrus agrees that some or all of the proposed upgrades referenced in subpart a. are at least as likely to impose real costs on PacifiCorp as the next proxy renewable and non-renewable resources identified in PacifiCorp's IRP and utilized in the current deficiency period avoided cost rates, please state so.*

Response: Staff agrees.

1.3. Reference PacifiCorp's 2015 integrated resource plan at pages 10-13.

- a. Does Ms. Andrus agree that the short-term firm market purchases, labeled as front office transactions, are "real costs" to PacifiCorp if completed by PacifiCorp

Response: Yes.

- b. Does Ms. Andrus agree that the coal resource additions are "real costs" to PacifiCorp if completed by PacifiCorp.

Response: Yes.

1.4. Reference PacifiCorp's 2015 integrated resource plan at page 196, Table 8.7  
"Preferred Portfolio."

- a. Does Ms. Andrus agree that the 423 MW combined cycle combustion turbine scheduled for 2028 is a "real cost" to PacifiCorp if completed by PacifiCorp?

Response: Yes.



1.5. Reference PacifiCorp's 2015 integrated resource plan at Vol. II, pp. 298-299.

a. Does Ms. Andrus agree that the environmental upgrades are "real costs" to PacifiCorp if completed by PacifiCorp?

Response: Yes.