August 11, 2017

**VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY**

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

**RE: UM 1810—Stipulation and Joint Testimony**

PacifiCorp d/b/a Pacific Power (PacifiCorp) encloses for filing in this docket the following documents:

- The Stipulation between PacifiCorp, Staff of the Public Utility Commission of Oregon, the Oregon Citizens’ Utility Board, the Industrial Customers of Northwest Utilities, Forth, Greenlots and the Oregon Department of Energy; and,

- Joint Testimony in Support of the Stipulation.

If you have questions about this filing, please contact Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583.

Sincerely,

Etta Lockey
Vice President, Regulation

Enclosures
BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1810

In the Matter of
PACIFICORP d/b/a PACIFIC POWER

Applications for Transportation Electrification Programs

STIPULATION

INTRODUCTION

PacifiCorp d/b/a PacifiCorp (PacifiCorp or Company), Staff of the Public Utility Commission of Oregon (Staff), and the Oregon Citizens’ Utility Board (CUB), Industrial Customers of Northwest Utilities (ICNU), the Oregon Department of Energy (ODOE), Forth, and Greenlots (collectively the Stipulating Parties) enter into this Stipulation to resolve all issues in docket UM 1810, PacifiCorp’s 2017 Transportation Electrification Plan.\(^1\)

BACKGROUND

In accordance with Senate Bill (SB) 1547, PacifiCorp filed its initial transportation electrification applications on December 27, 2016, proposing three pilot programs anticipated to accelerate transportation electrification in PacifiCorp’s Oregon service territory.

In February 2017, Commission Staff requested additional information to expedite the review process. In response, PacifiCorp filed a supplemental application on April 12, 2017.

On May 31, 2017, PacifiCorp hosted a settlement conference where intervening parties expressed support for, concerns with, and suggestions for improvement of various aspects of PacifiCorp’s proposed pilot programs.

\(^1\) ChargePoint is the only intervening party that does not support the settlement.
Based on this discussion the Stipulating Parties worked collaboratively to reach consensus on clarifications, modifications and additional requirements for the proposed pilot programs.

AGREEMENT

1. This Stipulation settles all issues in this docket and modifies the transportation electrification pilot programs proposed by PacifiCorp in its April 12, 2017 Supplemental Application as described in the terms below.

With regard to the Public Charging Pilot, the Stipulating Parties agree that:

2. Program expenses will be capped at $1.85 million during the pilot period, 2017-2019. The Company clarifies that only the Equipment and Installation line item in the proposed budget and a portion of the Program Administration directly attributable to bringing the charging pods into service will be treated as capital expenses. All other program costs will be treated as operations and maintenance (O&M) items.

3. PacifiCorp will apply any revenue from drivers’ use of pilot program stations, less the Company’s cost to deliver the electricity to the station, and any value derived from Clean Fuels Program credits generated by the stations to reduce the pilot program’s cost to PacifiCorp’s ratepayers.
4. PacifiCorp will schedule a workshop with the Stipulating Parties within 30 days of program approval focused on the further refinement of site evaluation criteria and monitoring criteria.

5. PacifiCorp will share a list of potential high-value sites for charging pods with Commission Staff before selecting the first site.

**With regard to the Outreach and Education Pilot, the Stipulating Parties agree that:**

6. The estimated expenses for “Customer Communications” and the estimated expenses for “Community Events” presented in Table 15 of PacifiCorp’s April 12, 2017, supplemental application (Supplemental Application) will be reduced by 50 percent. PacifiCorp will use the funds removed from the Customer Communications and Community Events budget to cover the costs of the projects described in paragraphs 15 and 16. The Company clarifies that all line items in the proposed program expenses are O&M items.

7. Program expenses during the pilot period, 2017-2019, will be capped at $1.105 million, less a reduction of 50 percent of the Company’s initial proposed budgets for Customer Communications and Community Events, which the Stipulating Parties agree will be used as described in item 17 below.

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2 Including objectives for rural versus urban siting, long distance travelers versus urban commuters, and metrics used to locate high-value sites for both types of drivers.

3 Including the specific learnings to be gained from the project, such as the data to be generated and for what purpose; the parties expressed support for a focus on time-varying pricing to drivers and the beneficial integration of EV charging load onto the system.
8. PacifiCorp will focus Customer Communications expenses, to the extent practical, on promoting and supporting the success of the Company’s transportation electrification pilot programs that are approved by the Commission in this docket.

**With regard to the Demonstration and Development Pilot, the Stipulating Parties agree that:**

9. Program expenses will be capped at $1.685 million during the pilot period, 2017-2019. The Company clarifies that all line items in the proposed program expenses are O&M items.

10. PacifiCorp will apply any value derived from Clean Fuels Program credits, which must be transferred to PacifiCorp by the grant awardee, to reduce the pilot program’s cost to PacifiCorp’s ratepayers.

11. PacifiCorp will submit to Commission Staff for their informal review the criteria that will be used to evaluate applications and examples of projects that may be funded through the pilot program at least 30 days prior to releasing PacifiCorp’s first solicitation.

12. Application solicitations will include descriptions of the criteria that will be used to evaluate applications and examples of projects that may, or have been, funded through the pilot program. The solicitation will clarify that the examples provided are illustrative and do not preclude alternative project proposals.

13. The program is revised to include two separate project funding paths:

   a) 75 percent of funds in each cycle will be made available for projects evaluated based on the criteria presented in Table 16 of the Supplemental Application. In
the following sections of this document, projects evaluated based on these
criteria are referred to as “standard review” projects.
b) 25 percent of funds in each cycle will be earmarked for projects focused on
workplace charging and fleet vehicle electrification. The evaluation criteria for
these projects will be the same as those presented in Table 16 of the
Supplemental Application, dated April 12, 2017, with the following exceptions:
   i. Educational Benefits will not be considered in application evaluation
   ii. Environmental Benefits will not be considered in application evaluation
   iii. Community Benefits will not be considered in application evaluation
Workplace and fleet projects satisfying the criteria presented in Table 16 of the
Supplemental Application will be considered for the standard review path. If a
separate workplace charging program is approved by the Commission during
the pilot period, the two separate project funding paths will be eliminated and
all remaining funds will be made available to fund standard review projects.
c) In each funding cycle, if the total amount of funding awarded to fleet and
workplace charging projects is less than the total allotment for these projects,
remaining funds will be made available to fund standard review projects.
14. PacifiCorp will provide an informational report to Commission Staff after each funding
cycle containing information about each project that was approved for grant funding,
including the amount of money granted, total project costs, the site of each project
funded, the entity receiving the grant funds, information about the entity, why the
project was chosen for funding, what PacifiCorp will learn from each project, how the
project will be evaluated, expected life of the project, any identifiable non-energy
benefits, and how the project can reduce or offset the customer investment in the project.

With regard to additional items, the Stipulating Parties agree that:

15. PacifiCorp will support and fund developing an attribution model and cost-effectiveness framework and toolset to inform evaluation efforts and potential future transportation electrification program development. The Company will coordinate these efforts with Portland General Electric, if possible, and development will include a process for input from the Stipulating Parties.

16. PacifiCorp will develop and conduct an initial pilot study of potential system impacts of residential electric vehicle adoption in a selected portion of the Company’s Oregon service territory. Before beginning the study, PacifiCorp will share its proposed pilot study objectives, timeline and expected cost with the Stipulating Parties.

17. The activities included in paragraph 15 and 16 will be funded with costs removed from the Outreach and Education Pilot, per paragraph 6. The costs for these activities will be recovered through Schedule 95 and will be capped at the amount of 50 percent of the Company’s initial proposed Outreach and Education budgets for Customer Communications and Community Events.

With regard to all PacifiCorp pilot programs in this Stipulation, the Stipulating Parties agree that:

18. PacifiCorp’s programs approved in this docket are pilot programs, meaning they are time-limited, cost-limited, and require specific learnings; further, Commission approval of this Stipulation does not imply that these pilots meet the six statutory factors established in Section 20(4) of Senate Bill 1547.
19. All program costs are subject to annual reporting and a prudence review. PacifiCorp plans to recover program costs through Schedule 95.

20. If PacifiCorp forecasts or has reason to suspect that additional funds may be required to successfully continue a pilot program, PacifiCorp will notify Staff and subsequently file a request in this docket (not an advice filing) for approval of additional funds that details the need for and proposed use of additional funding.

21. PacifiCorp will provide a progress update on all transportation electrification pilot programs and pilots to the Commission by March 31, 2019.

22. PacifiCorp will provide a report to the Commission on all pilot activities, including the results of program evaluation activities, by June 30, 2020.

23. The Stipulating Parties recommend and request that the Commission approve this Stipulation as an appropriate and reasonable resolution of the issues in this docket.

24. The Stipulating Parties agree that this Stipulation represents a compromise in the positions of the Stipulating Parties. Without the written consent of all Stipulating Parties, evidence of conduct or statements, including but not limited to term sheets or other documents created solely for use in settlement conferences in this docket, and conduct or statements made at settlement conferences, are confidential and not admissible in the instant or any subsequent proceeding, unless independently discoverable or offered for other purposes allowed under ORS 40.190.

25. The Stipulating Parties have negotiated this Stipulation as an integrated document. If the Commission rejects all or any material part of this Stipulation, or adds any material condition to any final order that is not consistent with this Stipulation, each Stipulating Party reserves its right: (i) to withdraw from the Stipulation, upon written notice to the
Commission and the other Stipulating Parties within five (5) business days of service of the final order that rejects this Stipulation, in whole or material part, or adds such material condition; (ii) pursuant to OAR 860-001-0350(9), to present evidence and argument on the record in support of the Stipulation, including the right to cross-examine witnesses, introduce evidence as deemed appropriate to respond fully to issues presented, and raise issues that are incorporated in the settlements embodied in this Stipulation; and (iii) pursuant to ORS 756.561 and OAR 860-001-0720, to seek rehearing or reconsideration, or pursuant to ORS 756.610 to appeal the Commission order. Nothing in this paragraph provides any Stipulating Party the right to withdraw from this Stipulation as a result of the Commission's resolution of issues that this Stipulation does not resolve.

26. This Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Stipulation throughout this proceeding and in any appeal, provide witnesses to support this Stipulation (if specifically required by the Commission), and recommend that the Commission issue an order adopting the settlements contained herein. By entering into this Stipulation, no Stipulating Party shall be deemed to have approved, admitted or consented to the facts, principles, methods or theories employed by any other Stipulating Party in arriving at the terms of this Stipulation. Except as provided in this Stipulation, no Stipulating Party shall be deemed to have agreed that any provision of this Stipulation is appropriate for resolving issues in any other proceeding.

27. This Stipulation may be signed in any number of counterparts. Each counterpart is an original. Together, all counterparts form one single document.
For PacifiCorp:
Signature: ____________________________
Name: ETTA LOCKEY
Title: VP, REGULATION
Date: AUGUST 10, 2017

For ICNU:
Signature: ____________________________
Name: ________________________________
Title: ________________________________
Date: ________________________________

For Staff:
Signature: ____________________________
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Title: ________________________________
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For CUB:
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For Forth:
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For Greenlots:
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<td>Name: Jesse Cowell</td>
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<td>Title: Attorney for ICNU</td>
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<td>Name</td>
<td>Mike Goetz</td>
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Title:______________________________
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For Greenlots:
Signature:__________________________
Name:Thomas Ashley
Title:VP, Policy
Date:August 10, 2017
For ODOE:

Signature: [Signature]

Name: Daniel S. Avery

Title: Senior Policy Analyst

Date: 8/11/2017
BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

PACIFICORP

Stipulating Parties’ Joint Testimony of
Eli Morris, Jason Salmi Klotz, Bradley Mullins, Bob Jenks,
Jeff Allen, Thomas Ashley, Dan Avery

August 2017
UM 1810

PacifiCorp Applications for Transportation Electrification Programs

Joint Testimony in Support of Settlement Stipulation
Q. Please state your name, business address, and present position.

A. My name is Eli M. Morris. My business address is 825 N.E. Multnomah Street, Suite 1500, Portland, Oregon, 97232. My title at PacifiCorp is Customer Solutions Program Manager. My qualifications appear in my Direct Testimony in Exhibit PAC/100.

My name is Jason R. Salmi Klotz. My business address is 201 High Street SE, Salem, Oregon 97301. I am a Principle Executive Manager, Climate Change Lead, employed in the energy Resources and Planning Division of the Public Utility Commission of Oregon (Commission). My qualifications appear in Staff Reply Testimony, Exhibit Staff/101 (filed May 24, 2017).


My name is Bob Jenks. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205. I am the Executive Director of the Oregon Citizens’ Utility Board (CUB), and am testifying on behalf of CUB. My qualifications appear in Exhibit CUB/101.

My name is Jeff Allen. My business address is 1732 NW Quimby Street #240, Portland, Oregon, 97209. I am the Executive Director of Forth. My qualifications appear in Exhibit Forth/101.

My name is Thomas Ashley. My business address is 925 N. La Brea Avenue, 6th Floor, Los Angeles, California, 90068. My title at Greenlots is Vice President,
Policy. I previously submitted testimony in this docket in Exhibit Greenlots/100.

My name is Dan Avery. My business address is 550 Capital Street N.E., 1st floor, Salem, Oregon 97301. I am a Senior Policy Analyst with the Oregon Department of Energy (DOE). My qualifications appear in Exhibit Stipulating Parties/101.

Q. What is the purpose of the joint testimony in this proceeding?

A. This joint testimony describes the terms of the settlement (Settlement Stipulation) reached by PacifiCorp, Public Utility Commission of Oregon Staff (Staff), ICNU, CUB, Forth, Greenlots, and ODOE (collectively, the Stipulating Parties). This joint testimony also asks the Commission to: (1) approve the pilot programs proposed by PacifiCorp, as modified by the terms of this settlement agreement; and (2) authorize recovery of pilot program costs, subject to the requirements of this settlement.

Q. How was the settlement reached?

A. In accordance with Senate Bill (SB) 1547, PacifiCorp filed its initial transportation electrification program applications on December 27, 2016. The application proposed three pilot programs anticipated to accelerate transportation electrification in PacifiCorp's Oregon service territory: (1) Outreach and Education Pilot; (2) Public Charging Pilot; and (3) Demonstration and Development Pilot.

In February 2017, Commission staff requested additional information from the Company to expedite the review process. In response, PacifiCorp filed a supplemental application on April 12, 2017 (Supplemental Application). On May 31, 2017, PacifiCorp hosted a settlement conference where intervening parties expressed support for, concerns with, and suggestions for improving various aspects of
PacifiCorp’s proposed pilot programs. Based on this discussion, the Stipulating Parties worked collaboratively to reach consensus on clarifications, modifications and additional requirements for the proposed pilot programs. Seven of the eight parties to this docket reached agreement and have joined the Stipulation. ChargePoint is the only intervening party that does not support the settlement.

Q. Please summarize the settlement.

A. The Stipulation modifies the three transportation electrification pilot programs proposed by PacifiCorp and settles all issues in this docket. Specifically, the settlement clarifies certain aspects of pilot programs proposed in PacifiCorp’s Supplemental Application, modifies aspects of the Outreach and Education and Demonstration and Development pilot programs, adds additional engagement of Stipulating Parties to the Public Charging pilot program, and creates two additional PacifiCorp work streams to inform potential future programs. All three pilots are time-limited, cost-limited, and provide data collection and specific learnings.

Q. Please summarize the Stipulation terms regarding the Public Charging Pilot

A. The following terms now apply to the proposed Public Charging Pilot:

1. Program expenses are capped at $1.85 million during the 2017-2019 pilot period. The Stipulation clarifies how program expenses will be treated (capital expenses versus operations and maintenance (O&M) costs).

2. PacifiCorp will apply any revenue from drivers’ use of pilot program stations, less the Company’s cost to deliver the electricity to the station, and any value derived from Clean Fuels Program credits generated by the stations to reduce the pilot program’s cost to PacifiCorp’s Oregon ratepayers.
3. PacifiCorp will schedule a workshop with the Stipulating Parties within 30 days of program approval by the Commission focused on the further refinement of site evaluation criteria and monitoring criteria.

4. PacifiCorp will share a list of potential high-value sites for charging pods with Commission staff before selecting the first site.

Q. Please summarize the Stipulation terms regarding the Outreach and Education Pilot

A. The following terms now apply to the proposed Outreach and Education Pilot:

1. The estimated expenses for “Customer Communications” and the estimated expenses for “Community Events” presented in Table 15 of the Supplemental Application will be reduced by 50 percent. PacifiCorp will use the funds removed from the Customer Communications and Community Events budget to cover the costs of the projects described in paragraphs 15 and 16 of the Settlement Stipulation; specifically, an attribution model/cost-effectiveness framework/toolset and study of system impacts of residential plug-in electric vehicles (PEVs) to PacifiCorp’s Oregon service territory. The Company clarifies that all line items in the proposed program expenses are O&M items.

2. Program expenses during the pilot period, 2017-2019, will be capped at $1.105 million, less a reduction of 50 percent of the Company’s initial proposed budgets for Customer Communications and Community Events, which the Stipulating Parties agree will be used as described in item 17 of the Settlement Stipulation.

3. PacifiCorp will focus Customer Communications expenses, to the extent practical, on promoting and supporting the success of the Company’s
transportation electrification pilot programs that are approved by the
Commission in this docket.

Q. **Please summarize the Stipulation terms regarding the public charging**

**Demonstration and Development Pilot.**

A. The following terms now apply to the proposed Demonstration and Development:

1. **Program expenses will be capped at $1.685 million during the pilot period,**
   2017-2019. The Company clarifies that all line items in the proposed program
   expenses are O&M items.

2. **PacifiCorp will apply any value derived from Clean Fuels Program credits,**
   which must be transferred to PacifiCorp by the grant awardee, to reduce the
   pilot program’s cost to PacifiCorp’s Oregon ratepayers.

3. **PacifiCorp will submit to Commission staff for their informal review the criteria**
   that will be used to evaluate applications and examples of projects that may be
   funded through the pilot program at least 30 days prior to releasing PacifiCorp’s
   first solicitation.

4. **Application solicitations will include descriptions of the criteria that will be**
   used to evaluate applications and examples of projects that may, or have been,
   funded through the pilot program. The solicitation will clarify that the examples
   provided are illustrative and do not preclude alternative project proposals.

5. **The program is revised to include two separate project funding paths:**
   a) **75 percent of funds in each cycle will be made available for projects**
   evaluated based on the criteria presented in Table 16 of the Supplemental
   Application and provided below. In the following sections of this
document, projects evaluated based on these criteria are referred to as
“standard review” projects.

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<th>Criteria</th>
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| **Project Feasibility/Utilization** | • Readiness of the project team and reasonableness of the project plan and timeline.  
• Feasibility study\(^1\) results, including compliance with national, state and local safety and accessibility requirements.  
• Expectation that the EVSE will be sufficiently used, based on an assessment of applicant-provided utilization projections (e.g. community needs assessment data, electric vehicle ownership data, survey data).  
• Project life (as reported by the applicant) and robustness of the ongoing operations and maintenance plan.  
• Plan to address interoperability with driver technologies and Pacific Power’s system (e.g. capabilities to interact with AMI when installed).  
• Expected driver payment pricing model, if applicable. |
| **Use of Funds**          | • Customer and Company financial commitment and leveraging of funds from other sources.  
• Alignment of project costs with industry standards.  
• Reasonableness of the proposed budget (i.e., risk of exceeding budget).  
• How project is designed to avoid risk of stranded investments.  
• Applicant and project need for funding support. |
| **Innovation**            | • Incorporation of emerging technologies, such as renewable generation, energy storage or direct load control.  
• Creative project design, partnerships and utilization of resources, particularly in serving underserved populations. |
| **Data Availability**     | • Type(s) of data available through the project.  
• Plan to collect and analyze data.  
• Mechanism(s) to share data with Pacific Power.  
• Ability to incorporate potential future electric grid services (e.g., demand response, vehicle-to-grid integration). |
| **Educational Benefits**  | • Physical and community visibility.  
• Education plan and awareness building opportunities. |

\(^1\) Customers may request a feasibility study under the proposed Outreach and Education pilot or perform a comparable study at their own expense.
b) 25 percent of funds in each cycle will be earmarked for projects focused on workplace charging and fleet vehicle electrification. The evaluation criteria for these projects will be the same as those presented in Table 16 of the Supplemental Application with the following exceptions: (i) Educational Benefits will not be considered in application evaluation; (ii) Environmental Benefits will not be considered in application evaluation; and (iii) Community Benefits will not be considered in application evaluation.

Workplace and fleet projects satisfying the criteria presented in Table 16 of the Supplemental Application will be considered for the standard review path. If a separate workplace charging program is approved by the Commission during the pilot period, the two separate project funding paths will be eliminated and all remaining funds will be made available to fund standard review projects.

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2 While Pacific Power has identified examples of underserved populations, there are likely additional segments that will be identified through the Company’s proposed transportation electrification pilots. Applicants will be expected to explain how proposed projects serve an underserved population, if applicable.
c) In each funding cycle, if the total amount of funding awarded to fleet and workplace charging projects is less than the total allotment for these projects, remaining funds will be made available to fund standard review projects.

6. PacifiCorp will provide an informational report to Commission Staff after each funding cycle containing information about each project that was approved for grant funding, including the amount of money granted, total project costs, the site of each project funded, the entity receiving the grant funds, information about the entity, why the project was chosen for funding, what PacifiCorp will learn from each project, how the project will be evaluated, expected life of the project, any identifiable non-energy benefits, and how the project can reduce or offset the customer investment in the project.

Q. Please describe any additional settlement terms.

A. The Settlement Stipulation includes the following additional terms that represent collaboration and compromise by the Stipulating Parties:

1. PacifiCorp will support and fund developing an attribution model and cost-effectiveness framework and toolset to inform evaluation efforts and potential future transportation electrification program development. The Company will coordinate these efforts with Portland General Electric, if possible, and development will include a process for input from the Stipulating Parties.

2. PacifiCorp will develop and conduct an initial pilot study of potential system impacts of residential electric vehicle adoption in a selected portion of the Company’s Oregon service territory. Before beginning the study, PacifiCorp
will share its proposed pilot study objectives, timeline and expected cost with
the Stipulating Parties.

3. The two activities listed above will be funded with costs removed from the
Outreach and Education Pilot. The costs for these activities will be recovered
through Schedule 95 and will be capped at the amount of 50 percent of the
Company’s initial proposed Outreach and Education budgets for Customer
Communications and Community Events.

The Stipulating Parties also agreed that the following new terms would apply to all three of
PacifiCorp’s pilot programs discussed above and supported in this inaugural filing:

1. PacifiCorp’s programs approved in this docket are pilot programs, meaning
they are time-limited, cost-limited, and require specific learnings; further,
Commission approval of this Stipulation does not imply that these pilots meet
the six statutory factors established in Section 20(4) of Senate Bill 1547.

2. All program costs allowed up to the stipulated cost caps are subject to annual
reporting and a prudence review before collection in customer rates.
PacifiCorp plans to recover program costs through its existing Schedule 95,
Pilot Program Cost Adjustment, by periodically proposing to decrease or
increase the Schedule 95 surcharge.\(^3\)

3. If PacifiCorp forecasts or has reason to suspect that additional funds may be
required to successfully continue a pilot program, PacifiCorp will notify Staff
and subsequently file a request in this docket (not an advice filing) for approval

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\(^3\) See PacifiCorp Supplemental Application at 53 (filed April 12, 2017).
of additional funds that details the need for and proposed use of additional funding.

4. PacifiCorp will provide a progress update on all transportation electrification pilot programs and pilots to the Commission by March 31, 2019.

5. PacifiCorp will provide a report to the Commission on all pilot activities, including the results of program evaluation activities, by June 30, 2020.

Q. As modified by the Stipulation, what is the total capped budget for the 2017-2019 period?

A. The total capped budget for all pilot programs and activities is $4.64 million. Capped budgets for individual pilot programs and activities are provided in the table below.

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Q. Do the Stipulating Parties believe the settlement aligns with the intent of SB 1547?

A. Yes. The proposed pilot programs are designed to accelerate transportation
electricity in PacifiCorp’s service territory and to gather data to inform future system and program planning. The settlement will increase access to electricity as a transportation fuel, encourage public and private investment, stimulate innovation, competition and customer choice, investigate the potential impacts of increased electric vehicle adoption on the grid and strategies to mitigate these impacts, and establish cost-effectiveness and attribution frameworks that will be valuable for reviewing and assessing future transportation electrification programs.

Q. What is PacifiCorp’s position on how the six factors established in Section 20(4) of SB 1547 for Commission consideration in approving transportation electrification programs and cost recovery inform the settlement?

A. As explained in detail in PacifiCorp’s supplemental pilot program application, the transportation electrification market is under- or un-developed in much of PacifiCorp’s service territory. While, pursuant to the Commission’s transportation electrification rules found at OAR 860-087, PacifiCorp’s Supplemental Application explained how the proposed pilot programs address the six factors, the lack of available data and experience specific to PacifiCorp’s service area make it difficult to provide the Commission with sufficiently reliable data to determine how to apply standard Commission practices for review of utility investment to transportation electrification, particularly as it relates to prudence and the “used and useful” standard. As such, the Stipulating Parties recommend the proposed programs be approved as pilots, and the settlement includes new work streams to be undertaken by PacifiCorp to inform application of the six factors in future program proposals. Significantly, SB 1547 only requires the Commission to consider the six factors.
This language indicates that the six factors provide guidance for the Commission, as opposed to substantive obligations that must be satisfied before a transportation electrification program is approved.

Q. What is the likely impact of the proposed pilot programs on the market for electric vehicle charging services in PacifiCorp’s service territory?

A. The proposed pilot programs will increase the use of electricity as a transportation fuel, stimulate the development of customer-owned electric vehicle charging stations, and increase the availability of publicly available fast charging stations in areas where drivers have few, if any, options today. Technical assistance and grant funding for non-residential customer projects offered through the Outreach and Education and Demonstration and Development pilot programs, respectively, will directly address awareness, technical, and financial barriers to electric vehicle charging station development. Concurrently, the Public Charging Pilot will deploy visible and reliable public charging stations in strategic locations across the state that can provide solutions for local commuters, drivers without access to residential off-street parking, and long distance travelers.

There is no evidence that the proposed pilot programs will have a negative impact on the market for electric vehicle charging services. On the contrary, increasing the availability of visible, reliable, and accessible charging stations is likely to increase demand for charging services and stimulate competition in the market, particularly in areas where a market does not currently exist. As discussed on page 25 of the Supplemental Application, a study by the National Renewable Energy
Laboratory\textsuperscript{4} found that the existence of visible public EVSE can help improve consumer perception and willingness to consider PEVs. Respondents who answered yes to “Are you aware of any electric vehicle charging stations along the routes you drive and the places you visit in a typical day that you could use if you drove an electric vehicle?” were the most likely to believe that PEVs were as good or better than gasoline vehicles and to consider acquiring a PEV. Improving awareness and increasing the adoption of PEVs will increase the need and demand for charging services, helping, not hindering, the competitive market.

As of February 2017, there were only three locations in PacifiCorp’s Oregon service area with publicly available fast chargers capable of charging any PEV, and only one of these stations was located outside of Portland. It is likely that customers and third-party electric vehicle charging service providers are not investing in PacifiCorp’s service area because there is insufficient demand for these services to justify a business case. SB 1547 established a clear directive for utilities to increase access to electricity as a transportation fuel and by investing in these areas, PacifiCorp will make it possible for additional drivers to adopt PEVs and for existing PEV owners to meet more of their driving needs with electricity. Promoting customer choice in transportation fuel will increase demand for electric vehicle charging services and stimulate private investment in public charging infrastructure.

that has not occurred at sufficient scale to support a robust market in PacifiCorp’s Oregon service territory to date.

Q. **Does the electric vehicle charging industry support the proposed pilot programs?**

A. Yes. Companies that produce and manage electric vehicle supply equipment support the proposed pilot programs. Greenlots, a provider of electric vehicle charging management solutions, is a stipulating party to this settlement and joined Eluminocity, EV Connect, ABB Inc., OPConnect, LLC, SemaConnect, Control Module, Inc., Efacec USA, Inc., and Shorepower Technologies in expressing support for PacifiCorp’s proposed pilot programs through a letter of support included as UM1810/Forth 102. ChargePoint is the only company that expressed concerns with aspects of proposed pilot programs through this docket.

Q. **Why does PacifiCorp support the settlement?**

A. While PacifiCorp believes the pilot programs proposed in the Supplemental Application represent appropriate initial efforts to accelerate transportation in its service territory and were worthy of Commission approval as proposed, we also recognize Stipulating Parties’ concerns and believe the settlement is a fair compromise that will allow the Company to accelerate transportation electrification in its service territory in accordance with the objectives of SB 1547. In addition to helping move the electric transportation market forward, the pilot programs and the two new work streams created through the settlement will provide critical experience, data, and frameworks to support PacifiCorp’s future system and program planning.
**Q. Why does Commission Staff support the settlement?**

**A. Overview**

The settlement collaboratively reached between the parties represents an important opportunity for PacifiCorp to understand how various programmatic efforts affect the electric vehicle market and its utility system operations. The pilot programs proposed and funded by this settlement are a small, but necessary, investment of ratepayer dollars that allow PacifiCorp to fulfill the requirements of SB 1547 while at the same time protecting ratepayers’ interests in reliable service at just and reasonable rates. Further, the pilots proposed by PacifiCorp are designed to be small in scale in order to not cause disruption or distortion of the electric vehicle charging market place. However, perhaps most importantly for Staff, the inaugural programs and expenditures agreed to between the stipulating parties result in the development of necessary data and tools for analysis of the electric vehicle market in PacifiCorp’s service territory and will help inform what approaches by Oregon utilities will best and properly accelerate transportation electrification.

**The settlement fulfills the requirements of Section 20(4) of SB 1547.**

Staff, in testimony,⁵ found that as pilot projects, PacifiCorp’s three proposed programs could help develop information and data that would better allow the Commission, Staff, and stakeholders to understand which activities undertaken by regulated utilities would most effectively fulfill the legislative intent and requirements of SB 1547, Section 20. Transportation has traditionally been a distinct sector of the economy that Oregon’s regulated utilities and its regulators have limited past

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⁵ Staff Reply Testimony at 6-10 (May 24, 2016).
engagement. However, the Oregon legislature has expressly instructed electric companies to propose programs to the Commission that accelerate transportation electrification—transportation electrification meaning “[t]he use of electricity from external sources to provide power to all or part of a vehicle.” Arguably, the impending increase in adoption of electric vehicles may require a change of the utility role in the transportation sector as it pertains to electric vehicles. Thus, the present settlement strikes the balance of allowing PacifiCorp to pilot a series of well-thought out and thoroughly-debated and modified programmatic activities at minimal cost to ratepayers. The pilots will benefit ratepayers by allowing the utility, Staff, and stakeholders to better understand: the proper and most effective role of the utility within the electric vehicle market, the most effective programmatic efforts a utility can undertake to accelerate adoption and utilization of electrified transportation without overburdening the market or competitors, and how to begin capturing the benefits of electrified transportation for utility ratepayers.

**Staff expects to gain information and important learnings from the pilot programs and activities reached in this settlement.**

The settlement reached by the stipulating parties will allow three pilot programs to reach the field relatively quickly and advance the collection of data necessary to understand the electric vehicle and transportation market in Oregon and in the service territories of individual utilities. In its Reply Testimony, Staff noted that a significant hurdle to confidence in program approval is understanding (in advance of program

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6 SB 1547, Section 20(3).
7 SB 1547, Section 20(1)(b)(A). Please also see the additional definitions of “Transportation electrification” found at Section 20(1)(b)(B)-(C).
rollout) how any one of the proposed programs will likely affect the market positively, or negatively. The judicious expenditures agreed upon in this settlement will fund three limited pilot programs, and the evaluation of those programs, in such a manner as to develop a record of information, qualitative and quantitative, that will assist regulators and stakeholders in understanding how best to guide investment by the utilities in the future.

**Staff joins the settlement based on the package of programs and additional items offered.**

The package of programs approved in settlement tests the effectiveness of many different approaches to utility activity in the electric transportation market. In particular, PacifiCorp will undertake two different approaches to public charger investment, each of which is adequately limited so as to not disrupt or unfairly compete in the currently struggling market. The settlement allows PacifiCorp to make direct investment and ownership decisions in utility-owned infrastructure in the Public Charging Pilot, as well as investments to support third-party-owned infrastructure through an innovative grant program called the Demonstration and Development Pilot. Evaluation of these two different approaches will help inform Staff and stakeholders on ways to serve market needs consistent with SB 1547 and increase ratepayer benefits and lower ratepayer costs. Additionally, the settlement reached by the Stipulating Parties will allow for further investment in workplace charging, which Staff and other parties expressed is a necessary component of market development and advancing electric vehicle adoption. Taking into account the

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8 Staff Reply Testimony at 7-10 and 18-20 (May 24, 2017).
positions of other parties, the settlement package also allows PacifiCorp to make
limited investments in non-infrastructure activities such as education and outreach to
help determine the efficacy and likely benefits of this approach. Lastly, the pilot
programs require PacifiCorp to collect data and improve its understanding of how
increased prevalence of transportation electrification will affect utility system
operations and reliability.

At this time, Staff supports the transportation electrification investments
outlined in this settlement package.
The three primary investments and additional research items outlined in the
settlement agreement are reasonable given the goals of the settling parties, the present
maturity of the market, the requirements of SB 1547 Section 20(3) and (4), and the
current level of understanding of the electrified transportation market in Oregon.
Additionally, Staff supports the small first investment proposed by PacifiCorp, given
that the utility could have proposed substantially larger commitments of ratepayer
dollars. Such an approach—making extraordinarily large capital investments with
recovery of such investments over several decades—would be concerning to Staff at
this time in an inaugural filing. Investments in an emerging market are riskier as the
market can change rapidly, possibly leaving the utility and ratepayer with stranded
costs. Additionally, the small size of the capital investment proposed by PacifiCorp
should alleviate concerns of unforeseen detrimental effects to the electric vehicle
market, market actors, the utility, and its ratepayers. In sum, the small amount of
utility investment agreed to through this settlement protects ratepayers and actors in
the market from harm while kick-starting thoughtful new pilot programs to accelerate
transportation electrification that will produce data and information necessary to
inform and design future transportation electrification proposals.

Q. Why does CUB support the settlement?

A. CUB supports the settlement as a reasonable compromise of the issues raised by the
Stipulating Parties in this docket. CUB supports the Company’s efforts to work with
stakeholders throughout the process in this docket, and believes that the Company’s
program application furthers the goals contemplated in SB 1547. Based on the
Company’s original filing, CUB was concerned that there was little focus or concern
about the impact that EV’s will have on PacifiCorp’s service territory. The
Settlement Stipulation alleviates CUB’s concern because the Company commits
to develop and conduct an initial pilot study of potential system impacts of residential
electric vehicle adoption in a selected portion of its Oregon service territory. The vast
majority of electric vehicle charging continues to occur in single-family residential
housing, and the impacts of oncoming electric vehicle charging load will have a large
impact on Pacific Power’s system. This pilot study will help the Company prepare
for a future in which this oncoming load can either have a positive or negative impact
on its system. CUB believes the pilot programs contemplated herein will provide
valuable knowledge about electric vehicle use and the market in Oregon on a going-
forward basis.

Q. Why does ICNU support the settlement?

A. ICNU supports the transportation electrification pilot programs outlined in the
Settlement Stipulation because they advance the aims of SB 1547 associated with the
acceleration of vehicle electrification. Importantly, the Settlement Stipulation
includes additional certainty surrounding the amount of funds available in the
Demonstration and Development Pilot for workplace charging and fleet
electrification programs, which ICNU considers to be a crucial component of any
strategy designed to accelerate adoption of electric vehicles. In addition to addressing
two major components of the demand for transportation (i.e., commuter vehicles and
fleet vehicles), these programs can be designed to provide direct benefits to large
customers, many of whom want charging stations located on their premises for their
employees, and where cost effective, are looking closely at electrification strategies
for fleet vehicles.

Q. Why does ODOE support the settlement?
A. ODOE believes that the pilot program represents an opportunity to investigate novel
and timely opportunities to expand EV infrastructure, support growth of EV
ownership, and define key learning opportunities to better inform public and private
decision making.

Q. Why does Greenlots support the settlement?
A. The pilots contained within the settlement represent important steps forward for the
electric vehicle and electric vehicle charging markets in PacifiCorp’s Oregon service
territory, and represent critical experience in the grid integration of electric vehicles
to be gained by the utility, and data to provide the Commission with greater context to
run future analyses on utility applications for transportation electrification
investments. While Greenlots agrees with PacifiCorp’s assessment that the pilots
represented in the Supplemental Application were appropriate as a starting point
under SB 1547, Greenlots appreciates the largely collaborative nature of the
settlement process and feels the result is a balanced, fair approach to (very modestly) accelerating the market for transportation electrification. Under the settlement there are market opportunities for a range of business models related to providing charging infrastructure and services, and once in place, there will be a modest deployment of a key backbone of reliable, visible, and accessible public fast charging infrastructure in PacifiCorp’s service territory.

Q. Why does Forth support the settlement?

A. Forth supports the settlement and appreciates PacifiCorp’s efforts in working with the stakeholders throughout the process in this docket. Forth originally argued for larger, bolder programs, particularly with regards to consumer engagement, in order to accelerate transportation electrification more quickly. However, we support this settlement as a reasonable first step that enjoys support from a broad range of stakeholders.

Q. Does this conclude your joint testimony?

A. Yes.
BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

PACIFICORP

Exhibit Accompanying Joint Testimony

Witness Qualifications of Dan Avery

August 2017
WITNESS QUALIFICATIONS STATEMENT

EMPLOYER: Oregon Department of Energy
TITLE: Senior Policy Analyst
Energy Technology & Policy Section
ADDRESS: 550 Capital N.E., 1st Floor
Salem Oregon, 97302
EDUCATION: Master of Business Administration – Sustainable Business and Renewable Energy
Marylhurst University, Marylhurst, Oregon
Bachelor of Science, Marine Biology
Texas A&M University, Galveston, Texas

EXPERIENCE: I have worked as a public servant in both the Federal Government and the State Government in Oregon for the last 28 years. I have worked as a technical analyst working on Federal Energy Regulatory Commission relicensing projects on major hydropower sites throughout Oregon and Washington. I work on land use developments related to energy and anadromous fish habitat and conducted dozens of Section 7 consultations under the Endangered Species Act. I wrote a policy guidance document outlining standardized analysis approaches for Section 7 of the ESA that has been adopted by multiple federal agencies nationwide. I worked with small rural communities to develop watershed scale habitat conservation plans along the Oregon coast. I have been employed as an energy policy analyst at the Oregon Department of Energy since June 2016.
CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp’s Stipulation and Stipulating Parties’ Joint Testimony on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

Service List
UM 1810

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>THOMAS ASHLEY (C)</td>
<td>GREENLOTS</td>
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<tr>
<td></td>
<td>925 N. LA BREA AVE., 6TH FL</td>
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ICNU UM 1810

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<td>DAVISON VAN CLEVE</td>
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<tr>
<td></td>
<td>333 SW TAYLOR ST., SUITE 400</td>
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<td>DAVISON VAN CLEVE</td>
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<td>507 BALLARD RD.</td>
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CHARGEPOINT

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<td>AMANDA DALTON</td>
<td>DALTON ADVOCACY INC</td>
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ANNE SMART

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## FORTH

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## ODOE

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## PACIFICORP UM 1810

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<tr>
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## OREGON CITIZENS UTILITY BOARD

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<td>OREGON CITIZENS’ UTILITY BOARD</td>
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Dated this 11th day of August, 2017.

Katie Savarin
Coordinator, Regulatory Operations