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September 4, 2020

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-1088

Re: UE 374 – In the Matter of PACIFICORP d/b/a PACIFIC POWER’S Request for a General Rate Revision.

Attention Filing Center:

Attached for filing in the above-referenced docket is PacifiCorp d/b/a Pacific Power’s Errata to the Prehearing Brief filed September 2, 2020. This errata clarifies the wording on page 42, as shown in redline.

For convenience, both a red-line and clean version of the corrected page of the Prehearing Brief are enclosed. Confidential material in support of the filing will be provided to qualified parties under Protective Order No. 20-040 via encrypted zip file.

Please contact this office with any questions.

Sincerely,

Katherine McDowell

Attachment

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of the confidential pages of PacifiCorp's **Errata to the Prehearing Brief** on the parties listed below that have signed the protective order via electronic mail and/or or overnight delivery in compliance with OAR 860-001-0180.

Service List UE 374

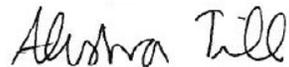
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Dated this 4th day of September, 2020.



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Paralegal
McDowell Rackner Gibson PC

UE 374

CLEAN VERSION

ERRATA PAGE 42

PACIFICORP'S PREHEARING BRIEF

Redacted

By the time the FNTP was issued, the Company knew that the actual costs of the EPC contract had been reduced by [REDACTED], directly increasing the benefits of the SCRs relative to natural gas conversion.²⁴⁷ These incremental benefits were easily calculated and did not require model runs to understand their impact on the SCR compliance alternative.²⁴⁸ On a revenue requirement basis, accounting for this known cost savings increased the SCR benefits to over [REDACTED] as of December 1, 2013.²⁴⁹

When the Company issued the FNTP on December 1, 2013, PacifiCorp also knew that the estimated costs for natural gas conversion would have been substantially higher than those used in the SCR analysis because pursuing gas conversion in December 2013 would have created a compressed development and construction schedule. In addition, the Company had subsequently obtained market-based evidence of conversion costs based on the proposal to convert Naughton Unit 3.²⁵⁰ Specifically, by January 2014, the Company had received competitive bids for the Naughton Unit 3 conversion that were, under a conservative estimate, approximately 30 percent more expensive than forecast.²⁵¹ As a result, the actual benefits of the SCRs relative to natural gas conversion were significantly higher than analyzed. Taken together, these factors would have made it unreasonable to change course and pursue a higher-cost, higher-risk compliance option.

6. *PacifiCorp Appropriately Did Not Include a Speculative Value for Water Rights.*

AWEC claims that PacifiCorp should have included the potential resale value of the Company's water rights in analyzing the economic impacts of early retirement.²⁵² PacifiCorp

²⁴⁷ PAC/700, Link/108.

²⁴⁸ PAC/700, Link/108.

²⁴⁹ PAC/2300, Link/11.

²⁵⁰ See PAC/2500, Owen/16.

²⁵¹ PAC/4000, Owen/21.

²⁵² AWEC/300, Kaufman/39. While AWEC previously claimed that the Company should have incorporated a

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REDLINED VERSION

ERRATA PAGE 42

PACIFICORP'S PREHEARING BRIEF

Redacted

By the time the FNTP was issued, the Company knew that the actual costs of the EPC contract had been reduced by [REDACTED], directly increasing the benefits of the SCRs relative to natural gas conversion.²⁴⁷ These incremental benefits were easily calculated and did not require model runs to understand their impact on the SCR compliance alternative.²⁴⁸ On a revenue requirement basis, accounting for this known cost savings increased the SCR benefits to over [REDACTED] as of December 1, 2013.²⁴⁹

When the Company issued the FNTP on December 1, 2013, PacifiCorp also knew that the estimated costs for natural gas conversion would have been substantially higher than those used in the SCR analysis, ~~both~~ because pursuing gas conversion in December 2013 would have created a compressed development and construction schedule, ~~and because~~ In addition, the Company had ~~since~~ subsequently obtained market-based evidence of conversion costs based on the proposal to convert Naughton Unit 3.²⁵⁰ Specifically, by January 2014, the Company had received competitive bids for the Naughton Unit 3 conversion that were, under a conservative estimate, approximately 30 percent more expensive than forecast.²⁵¹ As a result, the actual benefits of the SCRs relative to natural gas conversion were significantly higher than analyzed. Taken together, these factors would have made it unreasonable to change course and pursue a higher-cost, higher-risk compliance option.

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