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September 2, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97301

Re: In the Matter of PACIFICORP, dba PACIFIC POWER,
Request for a General Rate Revision
Docket No. UE-374

Dear Filing Center:

Please find enclosed the Joint Pre-Hearing Brief of the Klamath Basin Water Users Protective Association DBA Klamath Water Users Association (KWUA) and the Oregon Farm Bureau Federation (OFBF).

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

Sincerely,

Paul Simmons
Counsel for Intervenors KWUA and OFBF
psimmons@somachlaw.com
OSB 971386

Enc.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 374**

In the Matter of
PACIFICORP, dba PACIFIC POWER
Request for a General Rate Revision

Klamath Basin Water Users Protective
Association DBA Klamath Water Users
Association's and Oregon Farm Bureau
Federation's Joint Pre-Hearing Brief

I. INTRODUCTION

The Klamath Basin Water Users Protective Association DBA Klamath Water Users Association (KWUA) and the Oregon Farm Bureau Federation (OFBF) submit this pre-hearing brief consistent with the schedule established in this proceeding.

II. PARTIAL STIPULATION

After multiple settlement conferences held in the months of June, July, and August 2020, on August 17, 2020, certain parties submitted to the Public Utility Commission of Oregon (the Commission) a Partial Stipulation that resolved many of the issues in this proceeding. Signatories to the Partial Stipulation were PacifiCorp (“PacifiCorp” or “Company”), Staff of the Public Utility Commission of Oregon (Staff), the Oregon Citizen’s Utility Board (CUB), the Alliance of Western Energy Consumers (AWEC), Calpine Energy Solutions, LLC (Calpine Solutions), ChargePoint, Inc. (ChargePoint), Tesla, Inc. (Tesla), Fred Meyer Stores, Inc. (Fred Meyer), Small Business Utility Advocates (SBUA), Walmart Inc. (Walmart), KWUA, OFBF, and Vitesse, LLC (Vitesse) (collectively, “Stipulating Parties”). The Partial Stipulation did not include the Sierra Club.

The Partial Stipulation does not address all of the outstanding issues in this proceeding; for example, PacifiCorp’s capital structure and its allowed Return on Equity remain contested

issues as does the Power Cost Adjustment Mechanism. However, the Stipulating Parties were able to reach a settlement of all Rate Spread and Rate Design issues in the proceeding which included certain Rate Spread/Rate Design issues regarding PacifiCorp's proposed Schedule 41 irrigation and drainage rate tariff that were of concern to KWUA/OFBF and that were previously outlined in the Opening Testimony of Mr. Lloyd C. Reed.

At the time that the Partial Stipulation was filed with the Commission, the Stipulating Parties agreed that in lieu of filing joint testimony regarding the settlement, that each of the Stipulating Parties would indicate their support of the agreement in their individual pre-hearing briefs. As signatories to the partial stipulation agreement, KWUA and the OFBF support the settlement and believe that the Rate Spread/Rate Design issues covered in the agreement represent a fair and equitable outcome for PacifiCorp's irrigation and drainage customers that receive service under Schedule 41. KWUA and the OFBF therefore respectfully ask that the Commission approve the Partial Stipulation without modification.

DATED: September 2, 2020

SOMACH SIMMONS & DUNN

s/ Paul S. Simmons

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Water Users Protective Association DBA

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Oregon Farm Bureau Federation