

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

Docket No. UE 374

In the Matter of

PACIFICORP d/b/a PACIFIC POWER
COMPANY

) OPENING BRIEF OF
) TESLA, INC.
)

Request for a General Rate Revision

I. INTRODUCTION

In accordance with the procedural schedule put forth in Administrative Law Judge (ALJ) Alison Lackey's June 30, 2020 ruling, as modified, Tesla, Inc. (Tesla), submits this opening brief in the Matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision. Tesla has been an active participant in this proceeding, which includes opening and rebuttal testimony by Mr. William Ehrlich on behalf of Tesla. After submitting opening testimony (TESLA/100-103) and prior to filing rebuttal testimony (TESLA/200), Tesla was able to reach an agreement in principle with other parties related to the pertinent issues covered in its opening testimony. Tesla's rebuttal testimony states that an agreement in principle has been reached related to rate spread and rate design. After submission of rebuttal testimony a stipulation was signed by Tesla along with other parties and filed in the docket on August 17, 2020.¹

Tesla's primary issues enumerated in opening testimony were as follows:

¹ PacifiCorp, CUB, AWEC, Calpine Solutions, ChargePoint, Tesla, Fred Meyer, SBUA, Walmart, KWUA, Oregon Farm Bureau, Vitesse, and Staff's Partial Settlement Stipulation filed on 8/17/2020 in Docket No. UE 374.

1. The eligibility language for Schedule 45 should be modified to enable participation by all public DCFC stations.
2. The applicability language for Schedule 45 and Schedule 29 should be adjusted in terms of the demand cap.
3. The time-of-use periods for Schedule 29 should be aligned with the current time-of use periods of Schedule 45 rather than the time-of-use periods of Schedule 48.
4. Schedule 29 should include provisions to incrementally lift the participant cap if the 100-meter cap is reached due to increased customer interest.

These issues are sufficiently addressed in the stipulation as filed on August 17, 2020. Therefore, Tesla has no outstanding issues and does not intend to participate in oral argument on November 3, 2020.

II. STIPULATION

Tesla supports the stipulation as filed, which includes resolution on the initial issues raised in testimony. Paragraphs 14 and 19 in the stipulation specifically address Tesla's concerns in this case focused on Schedule 45 eligibility and Schedule 29 rate design.² The stipulation's terms address the issues raised by Tesla in a fair, just, and reasonable manner, and the stipulation should be approved.

III. CONCLUSION

Tesla appreciates the opportunity to submit this opening brief noting its support of the stipulation as filed. Tesla does not intend to participate in oral argument. Tesla thanks Pacific

² Tesla's Opening Testimony of William Ehrlich (Tesla/100-103, Ehrlich). Filed by Tesla on 6/4/2020 in Docket No. UE 374.

Power, Commission Staff, and other parties for working together towards an appropriate resolution in this matter.

Respectfully Submitted,

/s/Kevin Auerbacher

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