

ELLEN F. ROSENBLUM  
Attorney General



MARY H. WILLIAMS  
Deputy Attorney General

DEPARTMENT OF JUSTICE  
GENERAL COUNSEL DIVISION

May 20, 2013

Attention: Filing Center  
Public Utility Commission of Oregon  
550 Capitol Street NE, #215  
P.O. Box 2148  
Salem, OR 97301-2148  
[puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)

Re: *In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Investigation into  
Qualifying Facility Contracting and Pricing*  
PUC Docket No.: UM 1610  
DOJ File No.: 330-030-GN0240-12

Enclosed for filing in the above-captioned matter are an original and five copies of the Oregon Department of Energy's Prehearing Memorandum.

Sincerely,

Renee M France  
Senior Assistant Attorney General  
Natural Resources Section

RMF:jrs/4247393  
c: UM 1610 Service List (electronic copies only)

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1610**

In the Matter of )  
 )  
PUBLIC UTILITY COMMISSION OF ) OREGON DEPARTMENT OF  
OREGON, ) ENERGY'S PRE-HEARING  
 ) MEMORANDUM  
Staff Investigation into Qualifying )  
Facility Contracting and Pricing )

1 **INTRODUCTION**

2 This Pre-hearing Memorandum is filed on behalf of the Oregon Department of  
3 Energy (ODOE) pursuant to the direction from the Administrative Law Judge in the  
4 above captioned matter. ODOE's testimony supports the Oregon goals for  
5 qualifying small power production facilities<sup>1</sup> and encourages the development of  
6 qualifying facility (QF) projects in part by providing loans through the Small-scale  
7 Energy Loan Program (Loan Program) and grants through the Renewable Energy  
8 Development grant program. States are allowed a "wide degree of latitude" in

---

<sup>1</sup> Oregon Revised Statute 758.515 states in part:

(2) It is the goal of Oregon to:

(a) Promote the development of a diverse array of permanently sustainable energy resources using the public and private sectors to the highest degree possible; and

(b) Insure that rates for purchases by an electric utility from, and rates for sales to, a qualifying facility shall over the term of a contract be just and reasonable to the electric consumers of the electric utility, the qualifying facility and in the public interest.

(3) It is, therefore, the policy of the State of Oregon to:

(a) Increase the marketability of electric energy produced by qualifying facilities located throughout the state for the benefit of Oregon's citizens; and

(b) Create a settled and uniform institutional climate for the qualifying facilities in Oregon.

1 implementing the Public Utility Regulatory Policies Act of 1978 (PURPA) provided  
2 utilities are not obligated to pay generators more than the utilities' avoided costs.<sup>2</sup>

3 This Memorandum summarizes ODOE's position on each issue that ODOE has  
4 offered testimony and taken a position on. The information follows the format of the  
5 issues list created for this proceeding. Issues that ODOE has taken no position on  
6 are not included in this Memorandum.

## 7 **ISSUE LIST**

### 8 **1. Avoided Cost Price Calculation**

9 **1.A. What is the most appropriate methodology for calculating avoided cost**  
10 **prices?**

11 **1.A.i. Should the Commission retain the current method based on the cost of**  
12 **the next avoidable resource identified in the company's current IRP, allow**  
13 **an "IRP" method-based on computerized grid modeling, or allow some**  
14 **other method?**

15 For both standard and negotiated contracts, the Commission should retain the  
16 current method of calculating avoided costs based on wholesale power prices during  
17 the resource sufficiency period, and the cost of the next avoidable resource  
18 identified in the company's integrated resource plan (IRP) during the resource  
19 deficiency period. ODOE disagrees with PacifiCorp's proposal to change the  
20 avoided cost methodology for large QFs with negotiated contracts to the Partial  
21 Displacement Differential Revenue Requirement (PDDRR) modeling method. That  
22 method is complex, lacks transparency, is not necessarily more accurate and could  
23 deter QF development. See PAC/100, Dickman/7-9; ODOE/100, Carver/2-7.

24 ODOE agrees with PacifiCorp's proposal to calculate avoided cost prices  
25 during the resource sufficiency period using energy prices from a single market hub

---

<sup>2</sup> California Public Utilities Commission, 133 FERC ¶61,059, 61,255 (2010).

1 rather than blended market prices. However, the choice of the single market hub  
2 should depend on the location of the QF on PacifiCorp's system in order to best  
3 represent the costs that would actually be avoided by purchasing energy from the  
4 QF. Mid-Columbia hub pricing should be used for QFs interconnecting to PacifiCorp  
5 lines north of a dividing line, such as the Alvey transmission substation near Eugene  
6 or the Grizzly substation near Redmond. California-Oregon Border hub pricing  
7 should be used for QFs located south of that dividing line. See PAC/100,  
8 Dickman/5-7; ODOE/100, Carver/8-9; ODOE/400, Carver/8-9.

9 In lieu of lowering the standard contract eligibility cap as proposed by the  
10 electric companies, the Commission should adopt the following adjustments to the  
11 avoided cost prices paid to QFs under both standard and negotiated contracts.  
12 Such adjustments are a better way to address the utilities' concerns about the  
13 current mismatch between the avoided cost prices being paid to QFs and the value  
14 that QFs deliver to the companies' systems than eliminating the standard contract  
15 option for many QFs.

16 First, avoided cost prices paid to a QF should be adjusted for integration costs  
17 of the QF resource relative to the avoided resource as described in this  
18 Memorandum under Issue 4.A.

19 Second, avoided cost prices paid to the QF should be adjusted for the capacity  
20 value of the QF resource relative to the avoided resource. The capacity value of a  
21 new resource should be based on its contribution to meeting the electric company's  
22 reliability requirements during all hours of the year, not just during the highest peak  
23 load hours as suggested by PacifiCorp. See PAC/300, Dickman/14; ODOE/100,

1 Carver 7-8. The best tool for assessing the annual capacity contribution of each  
2 resource type is an effective load carrying capability (ELCC) calculation across all  
3 hours of the year. ODOE agrees with the arguments made by Renewable  
4 Northwest Project (RNP) in support of this position. See RNP/200, Lindsay/2-6. It is  
5 appropriate that capacity contribution values are addressed in the electric  
6 companies' IRPs. The Commission should direct the electric companies to run a  
7 comparative analysis of annual ELCC calculations for wind and solar resources and  
8 compare the results to those of the peak load method for discussion in the next IRP  
9 process. Rather than waiting for the next IRP, interim capacity values for wind and  
10 solar should be applied now in order to improve the accuracy of the avoided cost  
11 prices paid to QFs. The interim value for wind should be the capacity value used in  
12 the last IRP. The interim value for solar should be a 30 percent capacity credit. See  
13 ODOE/400, Carver 3.

14 Finally, ODOE agrees with OneEnergy's recommendation that avoided cost  
15 prices paid to QFs up to 3 MW that are connected to the distribution system should  
16 be adjusted to account for avoided transmission losses. A 3.9 percent adjustment  
17 value should be used, unless an electric company demonstrates a different value for  
18 transmission losses. See OneEnergy/100, Eddie/36-37, ODOE/400, Carver 5-6.

19 **1.C. Should QFs seeking renewal of a standard contract during a utility's**  
20 **sufficiency period be given an option to receive an avoided cost price for**  
21 **energy delivered during the sufficiency period that is different than the**  
22 **market price?**

23 The Renewable Energy Coalition's proposal that renewal contracts should  
24 receive resource deficiency prices for the entire new contract term has merit and  
25 should be considered. PacifiCorp's 2011 IRP deferred the acquisition of new firm

1 resources based on the expectation of QF contract renewal. This is appropriate  
2 planning strategy for all electric companies. The avoided cost prices paid to those  
3 renewing QFs should reflect the deferral of new resources. See Coalition/100,  
4 Lowe/21-22; ODOE/400, Carver/7.

## 5 **2. Renewable Avoided Cost Price Calculation**

6 **2.A. Should there be different avoided cost prices for different renewable**  
7 **generation sources? (for example different avoided cost prices for**  
8 **intermittent vs. base load renewables; different avoided cost prices for**  
9 **different technologies, such as solar, wind, geothermal, hydro, and**  
10 **biomass.)**

11 The adjustments to avoided cost prices based on the QF resource type are  
12 summarized under Issue 1.A. and should be applied to both the standard and  
13 renewable avoided cost calculations.

14 ODOE addresses integration charges for different renewable resources under  
15 Issue 4.A.

16 **2.B. How should environmental attributes be defined for purposes of PURPA**  
17 **transactions?**

18 The definition of environmental attributes should be decided in phase two of  
19 this docket in order to give parties time to develop a consensus position.

20 Environmental attributes should be defined in a manner consistent with Oregon's  
21 Renewable Portfolio Standard statute and administrative rules, and with the Western  
22 Renewable Energy Generation Information System (WREGIS) tracking system. As  
23 explained by RNP, the WREGIS definition explicitly excludes from the Renewable  
24 Energy Certificate the value associated with the capture and destruction of  
25 greenhouse gases. See ODOE/100, Carver/11-14; RNP/200, Lindsay/16-17.

1 **2.C. Should the Commission amend OAR 860-022-0075, which specifies that**  
2 **the non-energy attributes of energy generated by the QF remain with the**  
3 **QF unless different treatment is specified by contract?**

4 There is no need to amend OAR 860-022-0075. The rule is consistent with  
5 Order No. 11-505, which provides clear direction as to when non-energy attributes  
6 are to be transferred from a QF to the electric company purchasing the energy. See  
7 ODOE/100, Carver/14.

8 **3. Schedule for Avoided Cost Price Updates**

9 **3.A. Should the Commission revise the current schedule of updates at least**  
10 **every two years and within 30 days of each IRP acknowledgement?**

11 To improve accuracy of avoided costs to protect ratepayers, the frequency of  
12 the regularly scheduled avoided cost filings should be increased to annually. And to  
13 improve price certainty for QF developers to help meet state and federal PURPA  
14 goals, those filings should occur on a date certain each year. ODOE takes no  
15 position on the specific date. The regular filing process should include an  
16 evidentiary process of fixed duration to allow for stakeholder engagement.  
17 Additionally, avoided cost updates should continue to be filed within 30 days of each  
18 IRP acknowledgement order. The date of resource deficiency should be updated  
19 only if the Commission has issued an order updating the date, such as in an IRP  
20 acknowledgement order. See ODOE/300, Brockman/3.

21 **3.D. To what extent (if any) can data from IRPs that are in late stages of review**  
22 **and whose acknowledgement is pending be factored into the calculation**  
23 **of avoided cost prices?**

24 If, by chance, the dates for the utility's regular avoided cost update and its IRP  
25 acknowledgement fall close to each other, the Commission should issue an order to

1 skip the regularly scheduled avoided cost filing and rely on the IRP-triggered  
2 avoided cost filing, as it did in Order No. 07-428.

3 **3.E. Are there circumstances under which the Renewable Portfolio**  
4 **Implementation Plan should be used in lieu of the acknowledged IRP for**  
5 **purposes of determining renewable resource sufficiency?**

6 Generally, the IRP acknowledgement order is the best tool for determining the  
7 dates of resource sufficiency and deficiency. Still, the Commission should retain  
8 discretion to update the renewable resource deficiency date in its acknowledgement  
9 order for the Renewable Portfolio Standard implementation plan based on the facts  
10 at the time. Such an order updating the renewable resource deficiency date would  
11 trigger an update to the renewable avoided cost prices. See ODOE/300,  
12 Brockman/4-5.

13 **4. Price Adjustments for Specific QF Characteristics**

14 **4.A. Should the costs associated with integration of intermittent resources**  
15 **(both avoided and incurred) be included in the calculation of avoided cost**  
16 **prices or otherwise be accounted for in the standard contract? If so, what**  
17 **is the appropriate methodology?**

18 Avoided cost prices paid to QFs should be adjusted for the relative integration  
19 cost of the QF resource versus the avoided resource, for both the standard and  
20 renewable avoided cost options. In some cases, there would be no adjustment  
21 because the integration costs of the QF and the avoided resource are equal. The  
22 electric company's acknowledged IRP should be the source of the wind integration  
23 costs. One value for wind integration (\$ per MWh) should be specified in each  
24 electric company's published avoided cost schedule. The values will likely vary  
25 among electric companies.



1 No resources other than wind should incur integration charges at this time. In  
2 particular, solar QFs should not be charged for integration until the electric  
3 companies have demonstrated there are material integration costs for solar  
4 generation. The impact of solar QFs on net load variability is negligible at this time.  
5 See ODOE/400, Carver/4-5.

6 For standard contracts (10 MW and under) using the renewable avoided cost:

7 a) wind QFs should incur integration charges during the renewable resource  
8 sufficiency period (because the electric company is making market purchases and  
9 therefore not avoiding integration charges during that period), but not during the  
10 renewable resource deficiency period if the avoided resource is wind; and

11 b) solar and other renewable resource QFs should not incur integration charges  
12 during the renewable resource sufficiency period, and should receive an integration  
13 credit during the renewable resource deficiency period. See ODOE/100, Carver/10.

14 **4.C. How should the seven factors of 18 CFR 292.304(e)(2) be taken into**  
15 **account?**

16 For renewable resource QFs over 10 MW, the prices paid should be adjusted  
17 for integration costs and the remainder of the Federal Energy Regulatory  
18 Commission factors based on the characteristics of the renewable resource facility.  
19 The capacity credit for variable renewable resources should be based on an annual  
20 ELCC analysis. See ODOE/100, Carver/11.

21 **5. Eligibility Issues**

22 **5.A. Should the Commission change the 10 MW cap for the standard contract?**

23 The 10 MW eligibility cap for the standard contract should not be changed.

24 ODOE opposes the electric companies' suggestions to lower the eligibility cap. The

1 companies' concerns should instead be addressed by adjusting the avoided cost  
2 prices to more accurately reflect the true costs and benefits of adding QFs to their  
3 systems as discussed in Issue 1.A. That approach preserves the balance the  
4 Commission sought in Oregon No. 05-584 to encourage QF development while  
5 protecting ratepayers. See ODOE/500, Elliott/1-2.

6 Reducing the eligibility cap for standard contracts from 10 MW would almost  
7 certainly reduce the number of QF projects developed in Oregon. Not having a  
8 standard contract would disrupt the entire project development cycle for small QFs  
9 because lenders will not finance a project until the project revenues and other key  
10 contract terms are defined in the power purchase agreement. QF developers,  
11 regardless of sophistication, would incur significant legal fees to negotiate contracts,  
12 causing some projects to be financially unviable and deterring some developers  
13 altogether. See ODOE/200, Elliott/2-6; ODOE/500, Elliott/2-4.

14 All of the QF loan applications received by the Loan Program since  
15 Commission Order No. 05-584 increased the standard contract eligibility cap to 10  
16 MW were for projects under 10 MW. Half of those applications were for projects  
17 between 3 MW and 10 MW, and ODOE expects future hydro projects to be in the  
18 same size range. See ODOE/500, Elliott/3,5-6.

19 **5.D. Can a QF receive Oregon's Renewable avoided cost price if the QF owner**  
20 **will sell the RECs in another state?**

21 Yes. Consistent with Order No. 11-505, a QF receiving the renewable resource  
22 avoided cost rate owns the RECs generated during the renewable resource  
23 sufficiency period, when the QF receives the market price for the energy. During  
24 that renewable resource sufficiency period, the QF's options to sell its RECs,

1 whether in-state or out-of-state, should not be limited. During the renewable  
2 resource deficiency period, in which the QF receives the renewable resource  
3 avoided cost rate, the QF transfers all of the RECs to the electric company and does  
4 not have the option to sell those RECs to any other party, either in-state or out-of-  
5 state. See ODOE/300, Brockman/5.

## 6 **6. Contracting Issues**

### 7 **6.E. How should contracts address mechanical availability?**

8 Contract termination should not be the penalty for small QFs that occasionally  
9 miss mechanical availability requirements, as this would make small QF projects  
10 non-financeable. Instead, QFs that miss availability requirements should incur  
11 financial penalties based on actual harm to the electric company. Contracts should  
12 require notification and opportunity to remedy before such financial penalties are  
13 imposed. Mechanical availability should be measured on an annual basis. All three  
14 electric companies should adopt similar requirements. ODOE does not take a  
15 position on specific mechanical guarantee percentages and number of allowable  
16 hours for scheduled maintenance. See ODOE/200, Elliott 6-9; ODOE/500, Elliott/7-  
17 8.

### 18 **6.I. What is the appropriate contract term? What is the appropriate duration for** 19 **the fixed price portion of the contract?**

20 The current standard contract length of up to 20 years with fixed prices during  
21 the first 15 years should be maintained. Shorter contract terms could result in small  
22 QF projects becoming non-financeable. See ODOE/200, Elliott/10-11.

23 Additionally, ODOE agrees with OneEnergy's recommendation that QFs under  
24 3 MW that are connected directly to the electric company's distribution system may

1 receive fixed prices for the full contract term, rather than just the first 15 years.  
2 However, unlike OneEnergy, ODOE recommends that these projects also receive a  
3 maximum contract term of 20 years. See ODOE/400, Carver/8; OneEnergy/100,  
4 Eddie/37-39.

5 **CONCLUSION**

6 ODOE appreciates the opportunity to participate in this investigation and  
7 provide this Pre-hearing Memorandum.

8 Dated this 20<sup>th</sup> day of May, 2013

9

10 Respectfully submitted,

11  
12 ELLEN F. ROSENBLUM  
13 Attorney General

14  
15   
16

17 Renee M. France, OSB #004472  
18 Senior Assistant Attorney General  
19 Natural Resources Section  
20

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2013, I served the foregoing Oregon Department of Energy's Prehearing Memorandum in Docket UM 1610 upon all parties of record in this proceeding by electronic mail only as all parties have waived paper service.

OPUC Dockets  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite. 400  
Portland, OR 97205  
dockets@oregoncub.org

Oregon Dockets  
Pacifcorp, dba Pacific Power  
825 NE Multnomah Street, Suite.  
2000  
Portland OR 97232  
oregondockets@pacifcorp.com

RNP Dockets  
Renewable Northwest Project  
421 SW 6<sup>th</sup> Ave., Suite. 1125  
Portland OR 97204  
dockets@rnp.org

Gregory M. Adams (C)  
Richardson & O'Leary  
PO Box 7218  
Boise ID 83702  
greg@richardsonandoleary.com

Daren Anderson  
Northwest Energy Systems  
Company LLC  
1800 NE 8<sup>th</sup> St., Ste. 320  
Bellevue, WA 98004-1600  
da@thenescogroup.com

Brittany Andrus (C)  
Public Utility Commission of Oregon  
PO Box 2148  
Salem OR 97308-2148  
brittany.andrus@state.or.us

Stephanie S. Andrus (C)  
PUC Staff--Department of Justice  
Business Activities Section  
1162 Court St NE  
Salem OR 97301-4096  
stephanie.andrus@state.or.us

James Birkelund (C)  
Small Business Utility Advocates  
548 Market St. Ste. 11200  
San Fransisco, CA 94104  
james@utilityadvocates.org

Adam Bless (C)  
Public Utility Commission of Oregon  
PO Box 2148  
Salem OR 97308-2148  
adam.bless@state.or.us

Cynthia Fonner Brady  
Exelon Business Services Company  
4300 Winfield Road  
Warrenville IL 60555  
Cynthia.brady@constellation.com

Kacia Brockman (C)  
Oregon Department of Energy  
625 Marion St. NE  
Salem, OR 97301  
kacia.brockman@state.or.us

J. Laurence Cable  
Cable Huston Benedict Haagensen &  
Lloyd LLP  
1001 SW Fifth Ave. – Suite 2000  
Portland, OR 97204-1136  
lcable@cablehuston.com

Will K. Carey  
Annala, Carey, Baker, et al., PC  
Po Box 325  
Hood River, OR 97031  
wcarey@hoodriverattorneys.com

R. Bryce Dalley (C)  
Pacific Power  
825 NE Multnomah St., Suite 2000  
Portland OR 97232  
bryce.dalley@pacifcorp.com

Melinda J. Davison (C)  
Davison Van Cleave PC  
333 SW Taylor, Suite 400  
Portland OR 97204  
mjd@dvclaw.com  
mail@dvclaw.com

Megan Walseth Decker (C)  
Renewable Northwest Project  
421 SW 6<sup>th</sup> Ave #1125  
Portland OR 97204-1629  
megan@rnp.org

Bill Eddie (C)  
One Energy Renewables  
206 NR 28<sup>th</sup> Avenue  
Portland OR 97232  
bill@oneenergyrenewables.com

Loyd Fery  
11022 Rainwater Lane SE  
Aumsville, OR 97325  
dlchain@wvi.com

Renee M. France (C)  
Oregon Department of Justice  
Natural Resources Section  
1162 Court Street NE  
Salem OR 97301-4096  
renee.m.france@doj.state.or.us

Diane Henkels (C)  
CleanTech Law Partners PC  
6228 SW Hood  
Portland OR 97239  
dhenkels@actionnet.net

Kenneth Kaufmann (C)  
Lovinger Kaufmann LLP  
825 NE Multnomah Ste. 925  
Portland, OR 97232-2150  
kaufmann@lklaw.com

Richard Lorenz (C)  
Cable Huston Benedict Haagen  
& Lloyd LLP  
1001 SW Fifth Ave. – Suite 2000  
Portland, OR 97204-1136  
rlorenz@cablehuston.com

Mike McArthur  
Association of OR Counties  
PO Box 12729  
Salem, OR 97309  
mmcarthur@aocweb.org

Thomas H. Nelson  
PO Box 1211  
Welches OR 97067-1211  
nelson@thnelson.com

Elaine Prause  
Energy Trust of Oregon  
421 SW Oak St. #300  
Portland, OR 97204-1817  
elaine.prause@energytrust.org

Toni Roush  
Roush Hydro Inc.  
355 E Water  
Stayton, OR 97383  
tmroush@wvi.com

J. Richard George (C)  
Portland General Electric Company  
121 SW Salmon St. 1WTC1301  
Portland OR 97204  
richard.george@pgn.com

Julia Hilton (C)  
Idaho Power Company  
PO Box 70  
Boise ID 83707-0070  
jhilton@idahopower.com

Matt Krumenauer (C)  
Oregon Department of Energy  
625 Marion St NE  
Salem OR 97301  
matt.krumenauer@state.or.us

Jeffrey S. Lovinger (C)  
Lovinger Kaufmann LLP  
825 NE Multnomah Suite 925  
Portland, OR 97232-2150  
lovinger@lklaw.com

G. Catroina McCracken (C)  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland, OR 97205  
catroina@oregoncub.org

Kathleen Newman  
Oregonians for Renewable Energy  
Policy  
1553 NR Greensword Dr.  
Hillsboro OR 97214  
kathleenoipl@frontier.com  
k.a.newman@frontier.com

Lisa F. Rackner (C)  
McDowell Rackner & Gibson PC  
419 SW 11th Ave., Suite 400  
Portland OR 97205  
dockets@mcd-law.com

Irion A. Sanger (C)  
Davison Van Cleve  
333 SW Taylor - Suite 400  
Portland OR 97204  
ias@dvclaw.com

John Harvey (C)  
Exelon Wind LLC  
4601 Westown Parkway, Suite 300  
West Des Moines, IA 50266  
john.harvey@exeloncorp.com

Robert Jenks (C)  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland, OR 97205  
bob@oregoncub.org

David A. Lokting  
Stoll Berne  
209 SW Oak Street, Suite 500  
Portland, OR 97204  
dlokting@stollberne.com

John Lowe  
Renewable Energy Coalition  
12050 SW Tremont Street  
Portland OR 97225-5430  
jravenesanmarcos@yahoo.com

Glenn Montgomery  
Oregon Solar Energy Industries  
Association  
PO Box 14927  
Portland OR 97293  
glenn@oseia.org

Mark Pete Pengilly  
PO Box 10221  
Portland OR 97296  
mpengilly@gmail.com

Peter J. Richardson (C)  
Richardson & O'Leary PLLC  
PO Box 7218  
Boise ID 83707  
peter@richardsonandoleary.com

Donald W. Schoenbeck (C)  
Regulatory & Cogeneration Services,  
Inc.  
900 Washington Street, Suite 780  
Vancouver WA 98660-3455  
dws@r-c-s-inc.com

John W. Stephens (C)  
Esler Stephens & Buckley  
888 SW Fifth Ave Suite 700  
Portland OR 97204-2021  
stephens@eslerstephens.com  
mec@eslerstephens.com

David Tooze  
City of Portland – Planning &  
Sustainability  
1900 SW 4<sup>th</sup> Suite 7100  
Portland, OR 97201  
david.tooze@portlandoregon.gov

Donovan E. Walker (C)  
Idaho Power Company  
PO Box 70  
Boise ID 83707-0070  
dwalker@idahopower.com

Chad M. Stokes  
Cable Huston Benedict Haagensen  
& Lloyd LLP  
1001 SW Fifth Ave. – Suite 2000  
Portland, OR 97204-1136  
cstokes@cablehuston.com

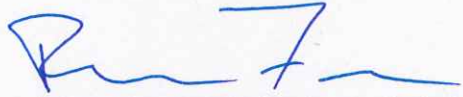
S. Bradley Van Cleve (C)  
Davison Van Cleve PC  
333 SW Taylor - Suite 400  
Portland OR 97204  
bvc@dvclaw.com

Mary Wiencke (C)  
Pacific Power  
825 NE Multnomah St, Suite 1800  
Portland OR 97232-2149  
mary.wiencke@pacificorp.com

Jay Tinker (C)  
Portland General Electric  
121 SW Salmon St 1WTC-0702  
Portland OR 97204  
Pge.opuc.filings@pgn.com

John M. Volkman  
Energy Trust of Oregon  
421 SW Oak St. #300  
Portland, OR 97204  
john.volkman@energytrust.org

(C)=Confidential



Renee M. France  
Senior Assistant Attorney General  
Natural Resources Section