

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 390

In the Matter of

PACIFICORP, dba PACIFIC POWER,

2022 Transition Adjustment Mechanism.

ISSUES LIST

The May 10, 2021 prehearing conference memorandum posted in this docket states the Commission and/or Administrative Hearings Division (AHD) will use issues lists in this proceeding. Issues lists are a new tool for the Transition Adjustment Mechanism (TAM) proceeding and the Commission is experimenting with issues lists as a means of flagging a few topics of initial interest early in the process so that topics can be developed more through the parties' normal testimony. To be clear, the Commission does not expect the company to file additional supplemental testimony, but PacifiCorp may address the issues in its response testimony if it chooses to.

There are potential downsides to the issues lists approach that the Commission cautions parties against. First, Order 20-392 set out certain directives for information and testimony; the requests below are incremental to the order and the parties' agreement in the stipulation. Second, the parties should not prioritize the below issues above other issues that the parties have identified. Third, the issues list is not a comprehensive list of areas of interest. The below issues are merely a few topics that the Commission would welcome more information on via the parties' normally scheduled testimony, if time and resources permit. Lastly, if a party notices that the topics have already been adequately addressed in PacifiCorp's initial filing, it would be helpful if the responsive pages could be noted for Commission review, particularly if the information is in a specific workpaper.

Issue 1: Last year's TAM order noted the stipulation provisions whereby PacifiCorp would produce an informational AURORA/GRID run without coal plant minimum take levels and using average coal prices. PacifiCorp's initial filing states this run is provided in the 15-day workpapers. The Commission is interested in hearing more about this informational run and how much it changed the coal plants' production levels, and net power costs overall. If a specific workpaper is useful for understanding the informational run, please provide the folder name and file name. If the informational run produced coal unit capacity factors that are closer to Integrated Resource Plan (IRP) modeling, please address which modeling approach is more appropriate for the power cost proceeding.

Issue 2: In the last two TAM orders, the Commission has required PacifiCorp to report the level of Production Tax Credits (PTCs) realized and, more recently, net power cost savings realized. Similar tracking and reporting is under development in Portland General Electric's power cost proceedings. The Commission is interested in hearing the parties' views about PacifiCorp's reporting in its initial filing, and whether it is transparent and useful for tracking the benefits of new projects, or whether different formats (such as the simple table used in PCAM testimony) would be more clear.

Issue 3: PacifiCorp's initial filing states that it has lowered the market caps in GRID to reduce off-system sales forecasts and produce a more accurate NPC forecast. PacifiCorp provides a total dollar estimate of the impact. The Commission is interested in understanding more details about the modeling change, such as the volume (MWh) of the change, the unit cost of modeled sales (\$/MWh) under the change, and the location of the change (market hubs).

Issue 4: PacifiCorp's initial filing describes how it calculates Energy Imbalance Market (EIM) benefits. The Commission's understanding is that volume (MWh) of EIM transactions are not modeled in the TAM, just the benefits (\$). The Commission is interested in EIM import and export volumes compared to the system balancing transactions that are modeled in GRID, whether the EIM volumes can be thought of as a subset of system balancing transactions, and analysis about how to appropriately capture changing trends and dispatch from the EIM in a TAM forecast.

Dated this 21st day of May, 2021, at Salem, Oregon.



Sarah Rowe
Administrative Law Judge