



# Oregon

Kate Brown, Governor

## Public Utility Commission

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June 25, 2020

### ***Via Electronic Filing***

OREGON PUBLIC UTILITY COMMISSION  
ATTENTION: FILING CENTER  
PO BOX: 1088  
SALEM OR 97308-1088

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

Attached is errata page 25 of Exhibit 1300 correcting the two numbers listed in line 21. The number 99.7 to 100.4 is corrected to read as 99.3 to 104.2.

A clean copy is included with this filing.

*/s/ Kay Barnes*

Kay Barnes

PUC- Utility Program

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CASE: UG 374  
WITNESS: SCOTT GIBBENS

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**STAFF EXHIBIT 1300**

**Opening Testimony**

**Errata**

**June 25, 2020**

1 **Q. Does Staff believe that GRID's persistent inability to accurately forecast**  
2 **market purchases and sales is a good reason to alter the PCAM?**

3 A. No. The Company's argument regarding the added costs of system balancing  
4 transactions and the asymmetrical nature of the prices the Company faces, is  
5 an issue that was addressed by the Commission based on a proposed model  
6 improvement from the Company in 2016. The Day-ahead/Real-time balancing  
7 transactions adjustment (DA/RT) was implemented for the 2016 TAM forecast,  
8 to more accurately model system balancing transaction volumes and prices. So  
9 two of the five years utilized to analyze this issue are inapplicable. They reflect  
10 a model which did not include this adjustment meant to directly fix the problem  
11 being raised by the Company currently. In addition to this issue, the Company  
12 did not include EIM transactions as a separate line item in the 2014 and 2015  
13 TAM. GRID does not model the EIM, and as such the benefit estimation has  
14 always been an out of model adjustment. In 2014 and 2015, the TAM only  
15 included the overall impact of the EIM as an after model adjustment, and was  
16 not included in the TAM estimation of net market purchases. This means that  
17 the actuals reflect operation in the EIM while the base NPC does not. Of the  
18 other three years, one year saw an over-recovery of NPC costs and one year  
19 resulted in an under-recovery of only roughly half a percent of total NPC costs.  
20 Meaning in two of the three years the Company claims the issue exists,  
21 PacifiCorp recovered between ~~99.7~~ 99.3 percent and ~~100.4~~ 104.2 percent of its  
22 power costs.

CASE: UG 374  
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