

November 21, 2005

Oregon Public Utility Commission  
Attn: Filing Center  
P.O. Box 2148  
Salem, OR 97308-2148

Re: In the Matter of MidAmerican Energy Holding Company  
Application for Authorization to Acquire Pacific Power &  
Light, dba PacifiCorp

Enclosed please find an original and five copies of the  
Direct Testimony of Thomas James (Jim) Abrahamson on behalf of the  
Community Action Directors of Oregon and the Oregon Energy  
Coordinators Association in the above-captioned Docket.

Thank you for your assistance.

Sincerely,

/s/ Thomas James (Jim) Abrahamson

Thomas James (Jim) Abrahamson

Enclosures  
cc: Service List

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1209

In the Matter of	)	
	)	
MIDAMERICAN ENERGY HOLDING	)	Direct Testimony of Thomas James (Jim)
COMPANY & PACIFICORP,	)	Abrahamson on behalf of the Community
	)	Action Directors of Oregon and the
Application for Authorization to Acquire	)	Oregon Energy Coordinators Association
Pacific Power & Light, dba PacifiCorp	)	
	)	

---

1           This testimony is submitted on behalf of the Community Action Directors of  
2 Oregon and the Oregon Energy Coordinators Association (CADO-OECA) who are  
3 intervenors in this docket relating to MEHC Energy Holdings Company’s (MEHC)  
4 application for authorization to acquire PacifiCorp. It is submitted by Thomas James  
5 (Jim) Abrahamson whose qualifications can be found in CADO-OECA Exhibit 101.

6

7 **A. Introduction**

8           The Community Action Directors of Oregon is a statewide organization  
9 comprised of the Directors of Oregon’s 18 Community Action Agencies, the Oregon  
10 Human Development Corporation, and 9 associate member agencies whose purpose is to  
11 provide direct services to, and promote the self-sufficiency of, low-income people.  
12 Community Action Directors of Oregon is highlighted in more detail in CADO-OECA  
13 Exhibit 102.

1           The Oregon Energy Coordinators Association is the energy advisory board to  
2 CADO. OECA's main purpose and goal is to help low-income Oregonians meet their  
3 energy needs through information sharing, identification of training needs and assistance  
4 in meeting those needs, interpretation and clarification of funding source regulations, and  
5 reviewing and commenting on legislation and regulations relating to low-income energy  
6 issues.

7           CADO-OECA have closely reviewed the material submitted by the Applicants in  
8 this docket and have actively participated in this application's process since its inception.  
9 We do not find that the proposed acquisition as it currently stands, and when compared to  
10 the potential harm we identify, possesses sufficient net benefits to customers, particularly  
11 low-income customers, to merit our support.

12

### 13 **B. Energy Problems Faced by PacifiCorp's Low-Income Customers**

14           Tens of thousands of Oregonians do not have sufficient money to pay for the  
15 basic necessities of life, such as food, shelter, health care, childcare, transportation and  
16 utilities. Statistics from the 2000 Census <sup>1</sup> show that Oregon's total population was  
17 3,421,399 people and that 11.6 percent of Oregonians were living with total annual  
18 incomes below the federal poverty level. Multiplying these two figures yields a total of  
19 396,882 people in Oregon who have total annual incomes below the federal poverty  
20 level. Dividing Oregon's poverty population by the State's 2000 Census estimate of total  
21 persons per household (2.51) you arrive at a figure of over 158,000 Oregon households  
22 that have total households incomes below the federal poverty level.

---

<sup>1</sup> US Census Bureau: State and County Quick Facts. Data Derived from Population Estimates, and the 2000 Census of Population and Housing.

1 Table 1 displays the most recent figures for the Federal Poverty Guidelines that  
 2 shows the annual federal poverty level for various household sizes for households at 100  
 3 percent, 75 percent, and 50 percent of the federal poverty level (FPL).

4 Table 1  
 5 2005 Federal Poverty Guidelines (\*)<sup>2</sup>

Household Size	100 Percent of FPL		75 Percent of FPL		50 Percent of FPL	
	Annual Income	Monthly Income	Annual Income	Monthly Income	Annual Income	Monthly Income
1	\$9,570	\$798	\$7,178	\$598	\$4,785	\$399
2	\$12,830	\$1,069	\$9,623	\$802	\$6,415	\$535
3	\$16,090	\$1,341	\$12,068	\$1,006	\$8,045	\$670
4	\$19,350	\$1,613	\$14,513	\$1,209	\$9,675	\$806
5	\$22,610	\$1,884	\$16,958	\$1,413	\$11,305	\$942
6	\$25,870	\$2,156	\$19,403	\$1,617	\$12,935	\$1,078
7	\$29,130	\$2,428	\$21,848	\$1,821	\$14,565	\$1,214
8	\$32,390	\$2,699	\$24,293	\$2,024	\$16,195	\$1,350

(\*) Figures Rounded to Nearest Dollar

8  
 9 As mentioned above, an estimated 158,000 Oregon households live with total  
 10 annual incomes below the federal poverty level. A recent study published by Fisher,  
 11 Sheehan & Colton<sup>3</sup> sheds some light on the distribution of these families and the total  
 12 home energy burdens they face.<sup>4</sup> According to this study, nearly 68,000 Oregon families  
 13 live below 50 percent of the federal poverty level; over 40,000 live with annual incomes

<sup>2</sup> Oregon Housing & Community Services, Energy Assistance Programs Operations Manual, Program Year 2006.

<sup>3</sup> On the Brink: 2005, Fisher, Sheehan & Colton, Belmont Massachusetts, May, 2005.

<sup>4</sup> Energy burden is the proportion of a household's total income that is consumed by energy costs.

1 between 50 and 74 percent of the federal poverty level; and over 48,000 families live  
 2 with annual income between 75 and 99 percent of the federal poverty level.<sup>5</sup> These  
 3 figures, when combined with the information contained on Table 1 illuminate the  
 4 frightening reality faced by many low income Oregonians. A single person at 50 percent  
 5 of the federal poverty level is living on an average monthly income of \$399. A family of  
 6 four, also at 50 percent of the federal poverty level, lives on a total monthly income of  
 7 \$806.

8 Maintaining the livability of a household's dwelling through the use of energy is  
 9 one of the basic necessities of life. Low-income households pay a significantly higher  
 10 percentage of their total household income for energy, including electricity, than other  
 11 households. The Fisher, Sheehan & Colton study cited above present energy burden  
 12 statistics for Oregon households that are living in poverty. Table 2 displays a summary  
 13 of these figures.

14 **Table 2**

15 **Oregon Households at Various Levels of the Federal Poverty Level and their Associated Home**  
 16 **Energy Burdens<sup>6</sup>**

	<u>Poverty Level</u>	<u>Home Energy Burden</u>
18	Below 50 percent	33.0 percent
19	50 to 74 percent	13.2 percent
20	75 to 99 percent	9.5 percent
21	100 to 124 percent	7.4 percent
22	125 to 149 percent	6.0 percent

<sup>5</sup> There is an insignificant statistical discrepancy of 1.43% between the Oregon estimates of Poverty population from the 2000 census and the figures cited in the FSC study. Such a discrepancy could easily emerge from a tiny difference in the estimate of persons per household that each utilized, or from the fact that the FCS figures estimated the number of poverty households below the 99 percent level of the federal poverty level.

<sup>6</sup> On the Brink: 2005, Fisher, Sheehan & Colton, Belmont Massachusetts, May, 2005.

1 Easing these household's energy burden is one of the goals of providing energy  
2 assistance to low-income Oregonians. To qualify for low-income energy assistance in  
3 Oregon (both bill payment assistance and weatherization) a household's total income  
4 needs to be at, or below, 60 percent of the State's median income. This level is  
5 approximately equal to 150 percent of the federal poverty level. There are approximately  
6 377,000 Oregonians that currently qualify for low-income energy assistance. But while  
7 requests for energy assistance are growing at CADO agencies, aid from federal, state,  
8 utility and voluntary sources isn't keeping pace. Last year, a little more than 20 percent of  
9 Oregon households that were eligible for low-income energy assistance received help  
10 before the cash ran out. By the end of January, CADO agencies reported that over 15,000  
11 households were on waiting lists throughout Oregon for assistance that most would never  
12 receive.

13 A large number of Oregon low-income customers who receive energy assistance,  
14 and the even greater number of those who do not, are PacifiCorp customers. In 2004,  
15 PacifiCorp provided electricity service to an annual average of 437,737 residential  
16 customers.<sup>7</sup> Applying Oregon's average poverty rate of 11.6 percent to this figure you  
17 arrive at an estimate of 50,777 PacifiCorp customers who live at, or below, the federal  
18 poverty level. The number who would actually qualify for bill payment assistance and  
19 weatherization at 60 percent of State Median Income is substantially higher.

20 While the problems faced by low-income households with high energy bills are  
21 daunting, the benefits to the utility and all customers of providing low-income customers  
22 with assistance are compelling. Utilities receive around 70 percent of the total amount

---

<sup>7</sup> 2004 Oregon Utility Statistics, Public Utility Commission of Oregon.

1 provided for low-income bill payment assistance in the form of payment of utility bills.  
2 These funds help to reduce customer arrearages, the costs associated with customer  
3 disconnection and reconnection, and the amount of revenue that is written off each year  
4 as uncollectible. Table 3 displays the dollar amount of PacifiCorp's residential net write-  
5 offs from fiscal year 1999 through fiscal year 2005. We believe that this information  
6 shows the impact that the Oregon Energy Assistance Program (OEAP), which was  
7 created through the implementation of SB 1149, has had in reducing residential customer  
8 write-offs. Funds for the OEAP program began arriving at Oregon Housing and  
9 Community Services in January, 2000. This initial money was associated with the  
10 program's bridge funding. Though collected in the later months of FY 2000, relatively  
11 small amounts of client payments would have been provided in the last three months of  
12 that fiscal year when compared to the amount of funds distributed in the following years.  
13 The figures shown in Table 3 reveal that for the two years prior to the creation and  
14 funding of the OEAP program the amount of annual net residential write-offs averaged  
15 nearly \$4.75 million. Over the next five years with the OEAP program in place, annual  
16 net residential write-offs averaged nearly \$3.59 million – a 24.4 percent reduction.  
17 CADO-OECA contend that this dramatic decline in net residential write-offs was made  
18 possible by the bill payment assistance meter charge included in SB 1149 that funds the  
19 OEAP program.

20

21

22

23

24

1

Table 3

**PacifiCorp Oregon Residential Net Write-offs  
(1000's of Dollars)<sup>8</sup>**

Year	Period	Oregon Net Write-offs
FY 1999	Apr 1998 - Mar 1999	\$4,625.09
FY 2000	Apr 1999 - Mar 2000	\$4,872.33
FY 2001	Apr 2000 - Mar 2001	\$3,286.93
FY 2002	Apr 2001 - Mar 2002	\$3,547.32
FY 2003	Apr 2002 - Mar 2003	\$3,739.53
FY 2004	Apr 2003 - Mar 2004	\$3,912.40
FY 2005	Apr 2004 - Mar 2005	\$3,459.74
Average FY 1999 thru FY 2000		\$4,748.71
Average FY 2001 thru FY 2005		\$3,589.18
Percentage Reduction FY 01-05 from FY 99-00		24.42%

2

3

In summary, tens of thousands of PacifiCorp's residential customers in Oregon face crushing energy burdens and are forced to make dramatic lifestyle, health and safety tradeoffs as a result. All low-income energy assistance funding sources combined provide only enough money to serve about 20 percent of customers who qualify for assistance. Any and all funding for low-income bill payment assistance directly helps other utility customers by providing payments to the utility that it might not otherwise receive. Reductions in customer arrearages, disconnections/reconnections and bad debt write-offs are tangible benefits enjoyed by all customers from assisting low-income ratepayers pay their energy bills.

12

13

<sup>8</sup> MEHC/PacifiCorp Response to CADO-OECA Data Request 3, November 15, 2005.



1 **C: Applicants Proposal Introduces Several Sources of Potential Harm to Oregon.**

2 In evaluating the potential risks and harms of this application we have compared  
3 the potential acquisition and operation of PacifiCorp by MEHC to PacifiCorp's status quo  
4 operations. We say this knowing that if this application is rejected future changes are  
5 most likely in store for PacifiCorp. We have learned through this application of the  
6 desire of Scottish Power to divest themselves of PacifiCorp because it's business profile,  
7 which includes the need to invest at least \$1 billion per year for at least the next five year  
8 to assure reliable electric energy service, does not match well with Scottish Power  
9 investor's expectations for regular dividends and returns on investment. PPL/100,  
10 Abel/11, 19-23. Apparently, MEHC found itself in the proverbial "right place at the right  
11 time" with that kind of money to invest and a willingness to accept an expected rate of  
12 return that is apparently unacceptable to Scottish Power. If this application is rejected we  
13 will be left in a situation where a potentially dissatisfied company, who would most  
14 likely seek another buyer, will own PacifiCorp. However, it would be speculative to  
15 presume how any future attempts by Scottish Power to sell, divest, or otherwise dispose  
16 of PacifiCorp would play out before this Commission in a 757.511 proceeding.  
17 Therefore, we conclude that the proper comparison of the net benefits and harms of this  
18 proposed transaction are to PacifiCorp's ongoing status quo operations.

19

20

21

22

23

24

1 CADO-OECA has identified four areas of potential harms to PacifiCorp's Oregon  
2 customers, particularly low-income customers from this proposed acquisition. These  
3 areas are:

- 4 ➤ **The Risk of Unnecessarily High Future Rates**
- 5 ➤ **Potential Lack of Sensitivity to the Importance of SB 1149**
- 6 ➤ **PacifiCorp Leadership's "Center of Gravity" and the Future of Local Jobs**
- 7 ➤ **Potentially Unnecessary Multi-State DSM Study and the Risks to Oregon's**  
8 **Low-Income Weatherization Programs**

9

10 *The Risk of Unnecessarily High Future Rates:* Against the backdrop of  
11 demonstrated income insufficiency and high energy burdens of low-income customers,  
12 we have become extremely alarmed that MEHC has come forward with an application  
13 that outlines an ambitious capital spending plan that presumes the need for price  
14 increases averaging four percent per year for the foreseeable future. Adding insult to  
15 injury, there is no discussion in either MEHC's direct testimony, or supplemental direct  
16 testimony, of the impact that increasing energy un-affordability will have on PacifiCorp's  
17 customers. MEHC is not offering any rate credits; is not offering any specific plan to  
18 control spending or cost escalation; and does not acknowledge the impact that these plans  
19 will have on low-income customers. MEHC's references to cost reductions totaling \$36  
20 over five years and \$75 million over a longer period of time pale to insignificance when  
21 compared to MEHC's multi-billion dollars investment plan. PPL/100, Able/3, 13-15.

22

23

1           At the October 25, 2005 Oral Presentation to the Commission in UM 1209, both  
2 Greg Abel and Judi Johansen addressed issues related to the application and to comments  
3 put forth by other parties in the case, including CADO-OECA. Neither Mr. Abel nor Ms.  
4 Johansen addressed the concerns put forward to the Commission by CADO-OECA about  
5 the negative impact that PacifiCorp's plans will have on low-income customers, nor on  
6 any new proposals that they intend to put forward to mitigate these negative impacts.

7           PacifiCorp plans to embark on an ambitious capital investment program that will  
8 lead to rate increases in Oregon averaging 4 percent per year for the foreseeable future.  
9 MEHC stands ready to provide the over \$1 billion per year for at least the next five years  
10 that Scottish Power is apparently unwilling to commit. This is great news if you have  
11 capital to invest and are satisfied with an expected rate of return that is apparently not  
12 acceptable to the present owner. We are left with the impression of a well-financed  
13 operation (what could be more well financed than Berkshire Hathaway) aggressively  
14 scanning the investment horizon looking for opportunities to put its capital to work – and  
15 finding PacifiCorp and its captive customer base. We contend that beneath the veneer of  
16 the “benefit” proposed by the applicant of having deep pockets and a willingness to  
17 invest lies a risk to ratepayers of overly aggressive capital investment – leading to  
18 unnecessarily high future electricity prices.

19

20           *Potential Lack of Sensitivity to the Importance of SB 1149:* Being new to Oregon,  
21 the risk exists that MEHC may not be sufficiently sensitive to the importance of SB 1149  
22 and the critical role this unique legislation plays in providing benefits to both low-income  
23 customers and to PacifiCorp itself. Senate Bill 1149 was watershed energy legislation for

1 Oregon. It provides an essential source of funding for weatherization (via a proportion of  
2 the public purposes charge) and bill payment assistance (via a separate meter charge) that  
3 provide valuable and indispensable relief to thousands of PacifiCorp's low-income  
4 customers. During the last program year, the Oregon Energy Assistance Program  
5 (OEAP) provided bill payment assistance to 10,359 PacifiCorp households while the  
6 Energy Conservation Helping Oregonians (ECHO) program weatherized the dwellings of  
7 708 low-income PacifiCorp customers.

8 MEHC representatives have made numerous statements in public forums about  
9 their intention to comply with all applicable laws and regulations. CADO-OECA's  
10 position is that as far as Oregon's SB 1149 is concerned, a blanket statement such as this  
11 is not sufficient protection from the risk that applicants may actively seek to alter this  
12 legislation in a manner detrimental to the broad interests of Oregonians, and PacifiCorp's  
13 low-income customers.

14  
15 *PacifiCorp Leadership's "Center of Gravity" and Future of Local Jobs:* In their  
16 direct testimony, MEHC offers a "benefit" to Oregon under the heading "Corporate  
17 Presence." PPL/100 Abel/18, 34-40. Applicants commit to maintaining adequate  
18 staffing and presence in each state, consistent with the provision of reliable service and  
19 cost-effective operations. Applicants shed additional light on this elastic concept with the  
20 inclusion of supplemental commitments made for Utah in recognition of the growth that  
21 is occurring in that jurisdiction. The supplemental commitments include increasing the  
22 number of corporate and senior management positions in Utah to better reflect the size of  
23 Utah's retail load compared to the retail loads of the other states. PPL/101 Abel/5.

24

1           In opening comments other intervenors, most notably the City of Portland (City of  
2 Portland Opening Comments, 3), the Industrial Customers of Northwest Utilities  
3 (Opening Comments of ICNU, 13), the Citizen’s Utility Board of Oregon (CUB Opening  
4 Comments, 19-20), and the Natural Resources Defense Council (NRDC Opening  
5 Comments, 4) correctly note this condition as being of major concern. CADO-OECA  
6 shares the concern about the potential loss of jobs and shift in corporate influence from  
7 Oregon to other states. Local elected officials, most notably Oregon’s Governor and the  
8 Mayor of the City of Portland, whose representatives met with the applicant to discuss  
9 this issue, also shared the concern. On September 23, 2005 it was announced that MEHC  
10 promised to keep the PacifiCorp headquarters in Portland if the acquisition is successful.  
11 However, also in the September 23 announcement, Keith Hartje, a MEHC Senior Vice  
12 President, reportedly stated that the company was reserving the right to fill executive-  
13 level vacancies to either Portland or Salt Lake City. Further, at the October 25, 2005  
14 Oral Presentation to the Commission in UM 1209, Greg Abel stated that MEHC intended  
15 to move two or three executive positions from Utah to Portland. Layered within these  
16 subtle statements is a potentially significant risk to Oregon ratepayers from this  
17 acquisition. Simply put, maintaining a corporate “headquarters” in a specific location is  
18 no guarantee of the organizations “center of gravity”, the total number of employees, and  
19 the “quality” of those positions. These statements could imply that MEHC’s ownership of  
20 PacifiCorp may lead to a hollowing of its overall corporate presence in Oregon. The  
21 ‘headquarters/leadership’ function could consist simply of a CEO or President along with  
22 a small support staff. Remaining Portland (and Oregon) based PacifiCorp employees  
23 and/or contractors could report to decision makers that are based in Salt Lake City. In an

1 environment such as this there are no allowances for maintaining the number of positions  
2 that would be Oregon-based, the quality of those positions (full-time employees versus  
3 part-time and/or contract employees) or the ongoing maintenance of a corporate culture  
4 that has been sensitive over the years to Pacific Northwest environmental, renewable  
5 resource and low-income issues.

6

7 *Potentially Unnecessary Multi-State DSM Study and the Risks to Oregon's Low*  
8 *Income Weatherization Programs:* In their direct testimony, MEHC committed to  
9 conducting a company-defined third-party market potential study of additional DSM and  
10 energy efficiency opportunities within PacifiCorp's service area. PPL/100 Abel 17, 44-  
11 46 and PPL/100 Abel 18, 1-21. In their supplemental direct testimony, MEHC states that  
12 they intend to convene a six-state working group, including "low-income agencies" to  
13 provide input into the design phase of the study. PPL/308 Gale 6, 11. In addressing the  
14 costs of this proposed study, MEHC commits that their shareholders will absorb the first  
15 \$1.0 million.

16 CADO-OECA share the concerns expressed by OPUC Staff in their opening  
17 comments (Staff's Opening Comments, 4) about the potential duplicative and  
18 unnecessary nature of this study given that the Oregon Public Purpose Funding, and the  
19 Energy Trust of Oregon, may also provide such benefits. Staff also raises a valid point  
20 that Oregon customers should not pay for ETO-like services in other states. These  
21 concerns should be fully explored in this docket, especially in light of MEHC's  
22 commitment to spend \$1.0 million in shareholder funds for the study – money that we  
23 contend could be better used to directly help assist low-income customers.

1           If applicants succeed in pursuing this study the potential risk emerges that  
2 Oregon’s proven low-income weatherization programs may become degraded over time  
3 through the application of a ‘least common denominator’ approach that attempts to  
4 equilibrate regional low-income weatherization efforts at a level below Oregon’s existing  
5 standards and funding levels when measured on as a percentage of utility net income.

6

7           In summary, CADO-OECA concludes that there are risks and harms inherent in  
8 this application to Oregon customers and that MEHC’s application is inadequate in  
9 addressing these risks and harms, and of providing net benefits to Oregon customers.

10

11 **D: CADO-OECA Conditions to Address the Risks and Harms of This Transaction.**

12           In light of the inadequacy of the Applicant’s proposal, CADO–OECA offer four  
13 conditions that we contend should be adopted as part of this application. These  
14 conditions address, in turn, the need for additional benefits that mitigate the four areas of  
15 risks and harms identified in the previous section. Without these conditions, CADO-  
16 OECA will not be able to conclude that this application has sufficient benefits for  
17 PacifiCorp’s Oregon low-income customers to merit our support. The appropriate issues  
18 categories identified for this Docket in Judge Smith’s November 1, 2005 ruling that are  
19 addressed with each of these four conditions are noted as footnotes.

20

21

1           1.       MEHC should provide \$2.0 million of shareholder funds per year for three  
2 years to help reduce the energy burden of its low-income residential customers.<sup>9</sup> CADO-  
3 OECA agrees to work directly with MEHC to develop the specific program parameters  
4 and the manner in which the funds will be administered.

5           2.       MEHC should make an explicit commitment to support the permanent  
6 continuation of SB 1149 including both the public purpose charge - a portion of which  
7 funds the Energy Conservation Helping Oregonians (ECHO) fund that is used for  
8 weatherization projects for low-income households - AND the separate meter charge that  
9 funds the Oregon Energy Assistance Program - low-income bill payment assistance  
10 program.<sup>10</sup> MEHC should also make a commitment to support changes in SB 1149 that  
11 protect low-income Oregonians from the fluctuations in real purchasing power of these  
12 funds caused by increases in electricity prices.

13          3)       MEHC should commit to there being no net loss of jobs in Oregon as a  
14 result of their acquisition of PacifiCorp. MEHC should also provide a strong statement  
15 of support for, and the continued evolution of, a corporate culture that has been sensitive  
16 over the years to Pacific Northwest environmental, renewable resource and low-income  
17 issues.<sup>11</sup>

18          4)       The value of Applicants proposed Demand Side Management study  
19 should be closely scrutinized, especially in light of the value that \$1.0 million in  
20 shareholder funds could provide if applied toward helping to ease low-income customer's  
21 energy burdens. It appears that this study may be unnecessary and duplicative. If the  
22 applicants are determined to pursue such a study, then CADO-OECA representatives

---

<sup>9</sup> Issue 3-c, UM 1209 Ruling, November 1, 2005

<sup>10</sup> Issue 3-d, UM 1209 Ruling, November 1, 2005

<sup>11</sup> Issue 5-a, UM 1209 Ruling, November 1, 2005



1 should be directly included in the efforts as a way of incorporating “low-income  
2 agencies” as suggested in MEHC’s Supplemental Direct Testimony. PPL / 308 Gale 6,  
3 11. Our representation is vital to help ensure that: a) the study correctly values the  
4 contribution that low-income weatherization programs make toward achieving the  
5 region’s energy efficiency goals, b) that Oregon’s excellent low income weatherization  
6 programs are not degraded and that other PacifiCorp state’s efforts are brought up to  
7 Oregon’s level, and c) to ensure that Oregon customers do not unfairly subsidize energy  
8 efficiency investments in other jurisdictions.<sup>12 13 14 15</sup>

9

#### 10 **D-1: Discussion of CADO-OECA Recommendation 1**

11 CADO-OECA is requesting that MEHC provide \$2.0 million per year for three  
12 years to help reduce the energy burden of a portion of its Oregon residential customers  
13 who qualify for low-income energy assistance. This funding can be viewed as partial  
14 bridge funding to any increases in bill payment assistance funding levels approved during  
15 the 2007 Oregon legislative session. CADO-OECA agrees to work directly with MEHC  
16 to develop the specific program parameters and the manner in which the funds will be  
17 administered. MEHC should be prepared to provide these funds in annual installments  
18 beginning at the closing of the acquisition. Any interest earned on these funds between  
19 the time they are provided by the Company and expended for program purposes will be  
20 made available for additional low-income purposes.

21

---

<sup>12</sup> Issue 1-a-i, UM 1209 Ruling, November 1, 2005

<sup>13</sup> Issues 3-c and 3-d, UM 1209 Ruling, November 1, 2005

<sup>14</sup> Issues 5-a, UM 1209 Ruling, November 1, 2005

<sup>15</sup> Issue 1-b-iv., UM 1209 Ruling, November 1, 2005

1           The impact of this additional funding on PacifiCorp's low-income customer base  
2 would be dramatic. If these funds were used exclusively for bill payment assistance then,  
3 after allowing for expenses associated with program delivery, over 5,300 PacifiCorp  
4 customers per year could receive \$300 in payments that would go directly to pay their  
5 utility bills. These funds will help reduce PacifiCorp's costs associated with customer  
6 disconnection & reconnection, payment arrearages and bad debt write-off since nearly 70  
7 percent of the funds will flow to PacifiCorp in the form of electricity bill payments.

8

9   **D-2: Discussion of CADO-OECA Recommendation 2**

10           As discussed previously, MEHC representatives have made numerous statements  
11 in public forums about their intention to comply with all applicable laws and regulations.  
12 As far as SB 1149 is concerned a blanket statement such as this is not sufficient  
13 protection from the risk that applicants may actively seek to alter this legislation in a  
14 manner detrimental to the broad interests of Oregonians and PacifiCorp's low-income  
15 customers in particular. We urge MEHC to make an explicit commitment to support the  
16 permanent continuation of Oregon's public purposes charge AND the customer charge  
17 that funds the low-income bill payment assistance program and to support adoption of  
18 mechanisms to protect the real purchasing power of these low-income programs from  
19 increases in electricity prices. Our current vision of the economic and energy future for  
20 Oregon unfortunately include increasing energy prices – particularly electricity. The  
21 need for weatherization, bill payment assistance, and innovative new ways to help reduce  
22 the energy burden, and promote the self-sufficiency, of low-income people will not only  
23 increase but will extend well past the current expiration date of SB 1149. The funding

1 provided by this legislation is critical and it should not only continue uninterrupted, but  
2 mechanisms should be put into place that will protect the purchasing power of the funds.

3

4 **D-3: Discussion of CADO-OECA Recommendation 3**

5 As a condition of this application CADO-OECA ask that the applicant commit to  
6 having no net job losses in Oregon as a result of MEHC's acquisition of PacifiCorp.

7 Further, we urge that MEHC formally recognize the importance of, and agree to maintain  
8 over time, the value, that the "Northwest Culture" brings to PacifiCorp's customers.

9 This value can be measured in PacifiCorp's commitment to environmental protection,  
10 renewable resource development, and a strong focus on community-level activities  
11 including activities supported by the community action agencies and their affiliates.

12

13 **D-4: Discussion of CADO-OECA Recommendation 4**

14 As discussed earlier, applicants proposed DSM study could be duplicative and  
15 unnecessary and should receive close scrutiny. If, after thorough evaluation, this region-  
16 wide exploration into DSM and energy efficiency opportunities occurs then CADO-  
17 OECA representatives need to be a direct part of the process. There are two primary  
18 reasons why our participation is needed. If, as MEHC contends, the result of this study  
19 will be "used by the Company in helping to direct ongoing DSM and energy efficiency  
20 opportunities"<sup>16</sup> then there could be an impact on the various states' low-income  
21 weatherization efforts. CADO-OECA strongly believe in both the energy efficiency  
22 component of low-income weatherization programs and this program's effectiveness at

---

<sup>16</sup> PPL/100, Abel/18

1 reducing the energy burden of low-income customers thereby making electricity more  
2 affordable. CADO-OECA further believes, and is prepared to demonstrate, that the low-  
3 income programs that have been developed and implemented in Oregon are among the  
4 best in PacifiCorp's service area. OECA, representing all local providers, partners  
5 through Oregon Housing and Community Services (OHCS) to ensure that training and  
6 technical assistance weatherization funding is utilized statewide for program  
7 standardization and capacity performance. Oregon has received national and regional  
8 recognition as a leader in setting the standards for home performance in energy  
9 efficiency. The Bonneville Power Administration has teamed with the State of Oregon to  
10 incorporate our standards, curriculum and specifications to train all contractors  
11 participating in ENERGY STAR programs being introduced in Oregon.

12

13 Our involvement in this potential study would be:

- 14 • to help assure that low-income weatherization remains a bone-fide energy  
15 efficiency program that can deliver proven, reliable and cost effective kWh  
16 savings
- 17 • to help assure that any effort to change the way low-income weatherization is  
18 delivered in other PacifiCorp jurisdictions looks toward the Oregon programs and  
19 funding commitments as standards that should be adopted region-wide – thereby  
20 protecting against any effort to degrade Oregon's proven programs by taking a  
21 "least common denominator" approach to regional low-income weatherization  
22 efforts. CADO-OECA strongly believe that any degradation to Oregon's proven  
23 low-income weatherization programs that is based upon efforts in other state's

1 served by PacifiCorp would be a significant reduction in customer service  
2 currently being provided to Oregon customers

- 3 • to help assure that any costs associated with improving DSM and energy  
4 efficiency in other PacifiCorp states – including low-income weatherization – are  
5 borne by the ratepayers in that state and are not subsidized by Oregon ratepayers.

6

### 7 **E. Conclusion**

8 MEHC's application currently provide insufficient benefits for customers –  
9 particularly low-income customers when compared to the potential harms we have  
10 identified. In the application's present form we do not find that customers are better  
11 served than they would be if PacifiCorp remained as it currently exists. If tangible  
12 benefits are not provided to PacifiCorp's customers, particularly low-income customers,  
13 especially when overall rate reductions are either non-existent or minimal, then CADO-  
14 OECA must conclude that there are not sufficient net public benefits created by this  
15 acquisition and would urge the Oregon PUC to reject this application.

16

17 Dated this 21<sup>st</sup> day of November, 2005

18

19

Respectfully Submitted,

20

21

22

23

24

Oregon Energy Partnership Coordinator  
Community Action Directors of Oregon

**CADO-OECA Exhibit 101**

**QUALIFICATIONS AND BACKGROUND OF  
THOMAS JAMES (JIM) ABRAHAMSON**

1 **Q: Please state your name and business address.**

2 A. My name is Thomas James (Jim) Abrahamson. My business address is 945 Columbia St.  
3 NE, Salem, Oregon 97303.

4  
5 **Q. By whom are you employed and in what capacity?**

6 A. I am the Oregon Energy Partnership Coordinator for the Community Action Directors of  
7 Oregon (CADO). In this capacity I work with CADO and the Oregon Energy  
8 Coordinators Association (OECA) to analyze, coordinate, communicate and implement  
9 issues and projects that provide needed energy benefits to low-income Oregonians.

10  
11 **Q. Please describe your educational background and professional experience.**

12 A. I was awarded a Masters of Science in Economics and a Bachelor of Science in  
13 Economics from Portland State University in Portland, Oregon. I have been the Oregon  
14 Energy Partnership Coordinator since January of 2004. I have nearly 20 years of  
15 experience in the electric utility industry in a variety of capacities. Most recently, I was  
16 employed by Cinergy / PSI Energy and was based in Indianapolis, Indiana. While  
17 employed at Cinergy / PSI Energy I was Manager of Strategic Planning Systems. Other  
18 responsibilities included the development of long-term population, employment and  
19 electric load forecasts associated with PSI's first IRP filing with the Ohio PUC, and

1 management of a major marketing program. Prior to that I was employed by Pacific  
2 Power and Light Company in Portland, Oregon. While employed at Pacific Power my  
3 responsibilities included long-term economic and electric load forecasting, strategic  
4 planning, public policy, and the administration of Pacific's first integrated resource  
5 planning process (RAMPP 1). While in Indiana, I also operated in the capacity as a  
6 loaned executive providing critical strategic planning and decision making services to  
7 non-profit agencies throughout central and southern Indiana. Most recently, I have  
8 served as the Chair of the Portland (Oregon) Utilities Review Board advising the Portland  
9 City Council on issues related to water, wastewater, stormwater and solid waste/recycling  
10 rates including the impact of the City's low-income utility assistance programs.

11  
12 **Q. Have you ever testified before this commission?**

13 A. Among the dockets that I have provided testimony and comments, both oral and written,  
14 to this commission include UM 1121, UF 4218, UM 1206, AR 500 and UG 163.

*Oregon's Community Action Network*

**ACCESS, Inc.**

P.O. Box 4666  
Medford, Oregon 97501  
Patty Claeys, Executive Director

**CAP of East Central Oregon (CAPECO)**

721 SE 3rd Street, Suite D  
Pendleton, Oregon 97801  
Donna Kinnaman, Executive Director

**Central Oregon Community Action Agency Network (COCAAN)**

2303 SW First Street  
Redmond, Oregon 97756  
Sharon Miller, Executive Director

**Clackamas County Social Services**

P.O. Box 2950  
Oregon City, Oregon 97045  
John Mullin, Director

**Community Action Organization**

1001 SW Baseline Street  
Hillsboro, Oregon 97123  
Jerralynn Ness, Executive Director

**Community Action Team, Inc. (CAT)**

310 Columbia Blvd.  
St. Helens, Oregon 97051  
Rocky Johnson, Executive Director

**Community Connection of NE Oregon (CCNO)**

104 Elm Street  
LaGrande, Oregon 97850  
Margaret Davidson, Executive Director

**Community Services Consortium (CSC)**

545 SW 2nd, Suite A  
Corvallis, Oregon 97333  
Tom Clancey-Burns, Executive Director



**Harney - Malheur Community Action Agency (HMCAA)**

17 S. Alder Street  
Burns, Oregon 97720  
Theresa Williams, Executive Director

**Josephine County Community Action Programs**

317 N.W. "B" Street  
Grants Pass, Oregon 97526  
Dawn Pike, Interim CAP Manager

**Klamath Lake CAA**

305 Main Street  
Klamath Falls, Oregon 97601  
Joyce Berry, Director

**Lane County Human Services Commission**

125 East 8th Avenue  
Eugene, Oregon 97401  
Steve Manela, Program Manager

**Mid-Columbia CAC (MCCAC)**

P.O. Box 1969  
The Dalles, Oregon 97058  
Jim Slusher, Executive Director

**Mid-Willamette Valley CAA (MWVCAA)**

2475 Center Street NE  
Salem, Oregon 97301  
Teresa Cox, Executive Director

**Multnomah County Office DSCP**

421 SW Oak Street, Suite 200  
Portland, Oregon 97204  
Mary Li, Manager

**Oregon Human Development Corporation (OHDC)**

Statewide Farmworker Services  
9620 SW Barbur Boulevard, Suite 110  
Portland, Oregon 97219  
Ron Hauge, Executive Director

**Southwestern Oregon Community Action Committee (SWOCAC)**

2110 Newmark Avenue  
Coos Bay, Oregon 97420  
Dave Helland, Ph.D., Interim Executive Director

**Umpqua Community Action Network (UCAN)**

2448 W. Harvard Boulevard  
Roseburg, Oregon 97470  
Michael Fieldman, Executive Director

**Yamhill Community Action Partnership (YCAP)**

P.O. Box 621  
McMinnville, Oregon 97128  
Doug Bartlett, Executive Director

## CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2005, I delivered an original and five copies of the foregoing TESTIMONY OF THE COMMUNITY ACTION DIRECTORS OF OREGON and the OREGON ENERGY COORDINATORS ASSOCIATION to:

ADMINISTRATIVE LAW JUDGE CHRISTINA M. SMITH  
PUBLIC UTILITY COMMISSION OF OREGON  
550 CAPITOL ST., NE., SUITE 215  
PO BOX 2148  
SALEM, OR 97308-2148

and on November 21, 2005, I hereby certify that the forgoing document was electronically served on all parties whom have an email address on the official service list, and by U.S. Mail, postage-prepaid, to those parties who do not have an email address on the official service list for UM 1209.

/s/ Thomas James Abrahamson

Thomas James (Jim) Abrahamson  
Oregon Energy Partnership Coordinator  
Community Action Directors of Oregon

NW ENERGY COALITION 219 FIRST ST STE 100 SEATTLE WA 98104 <a href="mailto:steve@nwenergy.org">steve@nwenergy.org</a>	RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a>
UTILITY WORKERS UNION OF AMERICA PO BOX 37 SAN CLEMENTE CA 92674-0037 <a href="mailto:uwua@redhabanero.com">uwua@redhabanero.com</a>	JIM ABRAHAMSON -- <b>CONFIDENTIAL</b> COMMUNITY ACTION DIRECTORS OF OREGON P.O. BOX 7964 SALEM OR 97303-0208 <a href="mailto:jim@cado-oregon.org">jim@cado-oregon.org</a>
DOUGLAS L ANDERSON MIDAMERICAN ENERGY HOLDINGS CO 302 S 36 ST STE 400 OMAHA NE 68131 <a href="mailto:danderson@midamerican.com">danderson@midamerican.com</a>	SUSAN ANDERSON CITY OF PORTLAND OFFICE OF SUSTAINABLE DEV 721 NW 9TH AVE -- SUITE 350 PORTLAND OR 97209-3447 <a href="mailto:susananderson@ci.portland.or.us">susananderson@ci.portland.or.us</a>

<p>PHIL CARVER -- <b>CONFIDENTIAL</b>  OREGON DEPARTMENT OF ENERGY  625 MARION ST NE STE 1  SALEM OR 97301-3742  <a href="mailto:philip.h.carver@state.or.us">philip.h.carver@state.or.us</a></p>	<p>ADAM S ARMS -- <b>CONFIDENTIAL</b>  MCKANNA BISHOP JOFFE &amp; SULLIVAN LLP  1635 NW JOHNSON ST  PORTLAND OR 97209  <a href="mailto:aarms@mbjlaw.com">aarms@mbjlaw.com</a></p>
<p>EDWARD BARTELL  KLAMATH OFF-PROJECT WATER USERS INC  30474 SPRAGUE RIVER ROAD  SPRAGUE RIVER OR 97639  CURTIS G BERKEY  ALEXANDER, BERKEY, WILLIAMS &amp;  WEATHERS, LLP  2000 CENTER STREET, SUITE 308  BERKELEY CA 94704  <a href="mailto:cberkey@abwwlaw.com">cberkey@abwwlaw.com</a></p>	<p>CHARLTON H BONHAM  TROUT UNLIMITED  828 SAN PABLO AVE  SUITE 208  ALBANY CA 94706  <a href="mailto:cbonham@tu.org">cbonham@tu.org</a></p>
<p>MAGGIE BRILZ  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707-0070  <a href="mailto:mbrilz@idahopower.com">mbrilz@idahopower.com</a></p>	<p>LOWREY R BROWN -- <b>CONFIDENTIAL</b>  CITIZENS' UTILITY BOARD OF OREGON  610 SW BROADWAY, SUITE 308  PORTLAND OR 97205  <a href="mailto:lowrey@oregoncub.org">lowrey@oregoncub.org</a></p>
<p>JOANNE M BUTLER  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707-0070  <a href="mailto:jbutler@idahopower.com">jbutler@idahopower.com</a></p>	<p>D KEVIN CARLSON -- <b>CONFIDENTIAL</b>  DEPT OF JUSTICE - GENERAL COUNSEL DIVISION  1162 COURT ST NE  SALEM OR 97301-4096  <a href="mailto:d.carlson@doj.state.or.us">d.carlson@doj.state.or.us</a></p>
<p>RALPH CAVANAGH -- <b>CONFIDENTIAL</b>  NATURAL RESOURCES DEFENSE COUNCIL  111 SUTTER ST FL 20  SAN FRANCISCO CA 94104  <a href="mailto:rcavanagh@nrdc.org">rcavanagh@nrdc.org</a></p>	<p>BRYAN CONWAY  PO BOX 2148  SALEM OR 97309-2148  <a href="mailto:bryan.conway@state.or.us">bryan.conway@state.or.us</a></p>
<p>JOHN CORBETT  YUROK TRIBE  PO BOX 1027  KLAMATH CA 95548  <a href="mailto:jcorbett@yuroktribe.nsn.us">jcorbett@yuroktribe.nsn.us</a></p>	<p>JOAN COTE -- <b>CONFIDENTIAL</b>  OREGON ENERGY COORDINATORS ASSOCIATION  2585 STATE ST NE  SALEM OR 97301  <a href="mailto:cotej@mwvcaa.org">cotej@mwvcaa.org</a></p>
<p>CHRIS CREAM -- <b>CONFIDENTIAL</b>  MULTNOMAH COUNTY  501 SE HAWTHORNE, SUITE 500  PORTLAND OR 97214  <a href="mailto:christopher.d.cream@co.multnomah.or.us">christopher.d.cream@co.multnomah.or.us</a></p>	<p>MELINDA J DAVISON -- <b>CONFIDENTIAL</b>  DAVISON VAN CLEVE PC  333 SW TAYLOR, STE. 400  PORTLAND OR 97204  <a href="mailto:mail@dvclaw.com">mail@dvclaw.com</a></p>
<p>MICHAEL EARLY  INDUSTRIAL CUSTOMERS OF NORTHWEST  UTILITIES  333 SW TAYLOR STE 400  PORTLAND OR 97204  <a href="mailto:mearly@icnu.org">mearly@icnu.org</a></p>	<p>JASON EISDORFER -- <b>CONFIDENTIAL</b>  CITIZENS' UTILITY BOARD OF OREGON  610 SW BROADWAY STE 308  PORTLAND OR 97205  <a href="mailto:jason@oregoncub.org">jason@oregoncub.org</a></p>
<p>ANN L FISHER  AF LEGAL &amp; CONSULTING SERVICES  2005 SW 71ST AVE  PORTLAND OR 97225-3705  <a href="mailto:energlaw@aol.com">energlaw@aol.com</a></p>	<p>ANDREA FOGUE  LEAGUE OF OREGON CITIES  PO BOX 928  1201 COURT ST NE STE 200  SALEM OR 97308  <a href="mailto:afogue@orcities.org">afogue@orcities.org</a></p>

<p>JOHN R GALE IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070 <a href="mailto:rgale@idahopower.com">rgale@idahopower.com</a></p>	<p>BERNARDO R GARCIA UTILITY WORKERS UNION OF AMERICA 215 AVENDIA DEL MAR, SUITE M SAN CLEMENTE CA 92672 <a href="mailto:uwua@redhabanero.com">uwua@redhabanero.com</a></p>
<p>ANN ENGLISH GRAVATT -- <b>CONFIDENTIAL</b> RENEWABLE NORTHWEST PROJECT 917 SW OAK - STE 303 PORTLAND OR 97205 <a href="mailto:ann@mp.org">ann@mp.org</a></p>	<p>DAVID E HAMILTON NORRIS &amp; STEVENS 621 SW MORRISON ST STE 800 PORTLAND OR 97205-3825 <a href="mailto:davidh@norrstev.com">davidh@norrstev.com</a></p>
<p>NANCY HARPER IBEW, LOCAL 125 17200 NE SACRAMENTO GRESHAM OR 97230 <a href="mailto:nancy@ibew125.com">nancy@ibew125.com</a></p>	<p>BRIAN JOHNSON -- <b>CONFIDENTIAL</b> TROUT UNLIMITED 825 SAN PABLO AVE SUITE 208 ALBANY CA 94706 <a href="mailto:bjohnson@tu.org">bjohnson@tu.org</a></p>
<p>JASON W JONES -- <b>CONFIDENTIAL</b> DEPARTMENT OF JUSTICE REGULATED UTILITY &amp; BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 <a href="mailto:jason.w.jones@state.or.us">jason.w.jones@state.or.us</a></p>	<p>ANDREA L KELLY PACIFICORP 825 NE MULTNOMAH ST STE 800 PORTLAND OR 97232 <a href="mailto:andrea.kelly@pacificorp.com">andrea.kelly@pacificorp.com</a></p>
<p>BARTON L KLINE -- <b>CONFIDENTIAL</b> IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070 <a href="mailto:bkline@idahopower.com">bkline@idahopower.com</a></p>	<p>KAITLIN LOVELL -- <b>CONFIDENTIAL</b> TROUT UNLIMITED 213 SW ASH ST, SUITE 205 PORTLAND OR 97204 <a href="mailto:klovell@tu.org">klovell@tu.org</a></p>
<p>KATHERINE A MCDOWELL STOEL RIVES LLP 900 SW FIFTH AVE STE 1600 PORTLAND OR 97204-1268 <a href="mailto:kamcdowell@stoel.com">kamcdowell@stoel.com</a></p>	<p>DANIEL W MEEK DANIEL W MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND OR 97219 <a href="mailto:dan@meeek.net">dan@meeek.net</a></p>
<p>WILLIAM MILLER -- <b>CONFIDENTIAL</b> IBEW, LOCAL 125 17200 NE SACRAMENTO GRESHAM OR 97230 <a href="mailto:bill@ibew125.com">bill@ibew125.com</a></p>	<p>MARK C MOENCH MIDAMERICAN ENERGY HOLDINGS COMPANY 201 SOUTH MAIN ST, STE 2300 SALT LAKE CITY UT 84111 <a href="mailto:mcmoench@midamerican.com">mcmoench@midamerican.com</a></p>
<p>CHRISTY MONSON LEAGUE OF OREGON CITIES 1201 COURT ST. NE STE. 200 SALEM OR 97301 <a href="mailto:cmonson@orcities.org">cmonson@orcities.org</a></p>	<p>BARBARA LEE NORMAN KARUK TRIBE OF CALIFORNIA PO BOX 657 YREKA OR 96097 <a href="mailto:bnorman@karuk.us">bnorman@karuk.us</a></p>

<p>MICHAEL W ORCUTT  HOOPA VALLEY TRIBE FISHERIES DEPT  PO BOX 417  HOOPA CA 95546  <a href="mailto:director@pcweb.net">director@pcweb.net</a></p>	<p>MATTHEW W PERKINS -- <b>CONFIDENTIAL</b>  DAVISON VAN CLEVE PC  333 SW TAYLOR, STE 400  PORTLAND OR 97204  <a href="mailto:mwp@dvclaw.com">mwp@dvclaw.com</a></p>
<p>JANET L PREWITT -- <b>CONFIDENTIAL</b>  DEPARTMENT OF JUSTICE  1162 COURT ST NE  SALEM OR 97301-4096  <a href="mailto:janet.prewitt@doj.state.or.us">janet.prewitt@doj.state.or.us</a></p>	<p>LISA F RACKNER -- <b>CONFIDENTIAL</b>  ATER WYNNE LLP  222 SW COLUMBIA ST STE 1800  PORTLAND OR 97201-6618  <a href="mailto:lfr@aterwynne.com">lfr@aterwynne.com</a></p>
<p>PETER J RICHARDSON  RICHARDSON &amp; O'LEARY  PO BOX 7218  BOISE ID 83707  <a href="mailto:peter@richardsonandoleary.com">peter@richardsonandoleary.com</a></p>	<p>STEVE ROTHERT -- <b>CONFIDENTIAL</b>  AMERICAN RIVERS  409 SPRING ST, SUITE D  NEVADA CITY CA 95959  <a href="mailto:srothert@americanrivers.org">srothert@americanrivers.org</a></p>
<p>GREGORY W SAID  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707  <a href="mailto:gsaid@idahopower.com">gsaid@idahopower.com</a></p>	<p>THOMAS P SCHLOSSER -- <b>CONFIDENTIAL</b>  MORISSET, SCHLOSSER, JOZWIAK &amp; MCGAW  801 SECOND AVE, SUITE 1115  SEATTLE WA 98104-1509  <a href="mailto:t.schlosser@msaj.com">t.schlosser@msaj.com</a></p>
<p>ROB ROY SMITH -- <b>CONFIDENTIAL</b>  MORISSET, SCHLOSSER, JOZWIAK &amp; MCGAW  1115 NORTON BUILDING  801 SECOND AVENUE  SEATTLE WA 98104-1509  <a href="mailto:r.smith@msaj.com">r.smith@msaj.com</a></p>	<p>THANE SOMERVILLE -- <b>CONFIDENTIAL</b>  MORISSET, SCHLOSSER, JOZWAIAK &amp; MCGAW  801 SECOND AVE, SUITE 1115  SEATTLE WA 98104-1509  <a href="mailto:t.somerville@msaj.com">t.somerville@msaj.com</a></p>
<p>GLEN H SPAIN -- <b>CONFIDENTIAL</b>  PACIFIC COAST FEDERATION OF  FISHERMEN'S ASSOC  PO BOX 11170  EUGENE OR 97440-3370  <a href="mailto:fish1ifr@aol.com">fish1ifr@aol.com</a></p>	<p>JOHN W STEPHENS -- <b>CONFIDENTIAL</b>  ESLER STEPHENS &amp; BUCKLEY  888 SW FIFTH AVE STE 700  PORTLAND OR 97204-2021  <a href="mailto:stephens@eslerstephens.com">stephens@eslerstephens.com</a></p>
<p>MARK THOMPSON  PUBLIC POWER COUNCIL  1500 NE IRVING STREET, SUITE 200  PORTLAND OR 97232  <a href="mailto:mthompson@ppcpdx.org">mthompson@ppcpdx.org</a></p>	<p>DOUGLAS C TINGEY  PORTLAND GENERAL ELECTRIC  121 SW SALMON 1WTC13  PORTLAND OR 97204  <a href="mailto:doug.tingey@pgn.com">doug.tingey@pgn.com</a></p>
<p>SANDI R TRIPP  KARUK TRIBE DEPT. OF NATURAL  RESOURCES  PO BOX 1016  HAPPY CAMP CA 95546  <a href="mailto:stripp@karuk.us">stripp@karuk.us</a></p>	<p>SARAH WALLACE -- <b>CONFIDENTIAL</b>  ATER WYNNE LLP  222 SW COLUMBIA STE 1800  PORTLAND OR 97201-6618  <a href="mailto:sek@aterwynne.com">sek@aterwynne.com</a></p>
<p>BENJAMIN WALTERS -- <b>CONFIDENTIAL</b>  CITY OF PORTLAND - OFFICE OF CITY  ATTORNEY  1221 SW 4TH AVE - RM 430  PORTLAND OR 97204  <a href="mailto:bwalters@ci.portland.or.us">bwalters@ci.portland.or.us</a></p>	<p>MICHAEL T WEIRICH -- <b>CONFIDENTIAL</b>  DEPARTMENT OF JUSTICE  REGULATED UTILITY &amp; BUSINESS SECTION  1162 COURT ST NE  SALEM OR 97301-4096  <a href="mailto:michael.weirich@state.or.us">michael.weirich@state.or.us</a></p>

<p>STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE SALEM OR 97305 <a href="mailto:weiss.steve@comcast.net">weiss.steve@comcast.net</a></p>	<p>LINDA K WILLIAMS KAFOURY &amp; MCDUGAL 10266 SW LANCASTER RD PORTLAND OR 97219-6305 <a href="mailto:linda@lindawilliams.ne">linda@lindawilliams.ne</a></p>
<p>PAUL WOODIN WESTERN WIND POWER 282 LARGENT LN GOLDENDALE WA 98620-3519 <a href="mailto:pwoodin@gorge.net">pwoodin@gorge.net</a></p>	