



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

August 31, 2015

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

RE: UM 1610 Phase II—Errata to Opening Testimony of PacifiCorp

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits for filing in the above-referenced docket the following errata to the Opening Testimony of Bruce W. Griswold:

- Exhibit PAC/1001, which provides detailed information on the Oregon Schedule 37 and Schedule 38 PPA and pricing requests. This errata includes the entire exhibit, which was inadvertently excluded from the filing on May 22, 2015.
- PAC/1000, Opening Testimony of Bruce Griswold, page 10. Clean and redline versions are attached showing the revision. The revision reflects the correct reference to Exhibit PAC/1001.

If you have questions about this filing, please contact Erin Apperson, Manager Regulatory Affairs, at (503) 813-6642.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosure

Docket No. UM-1610
Exhibit PAC/1000
Witness: Bruce W. Griswold

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

PACIFICORP

ERRATA
Opening Testimony of Bruce W. Griswold

August 2015

1 1978 (PURPA) regulations as promulgated by the Federal Energy Regulatory
2 Commission (FERC), specific criteria a QF must satisfy in order to establish that it
3 has “commit[ed] itself to sell all or part of its electric output to an electric utility” as
4 required by FERC.¹¹ A bright-line test will provide certainty for developers and
5 utilities alike, and will reduce the number of disputes around LEO formation.

6 **Q. Do you expect controversy around the LEO issue to continue if strong, clear, and**
7 **balanced guidelines are not established?**

8 A. Absolutely. As of May 1, 2015, the Company has forty Schedule 37 and Schedule 38
9 requests totaling 587 MW of nameplate capacity. Exhibit PAC/1001 provides detailed
10 information on the Oregon Schedule 37 and Schedule 38 PPA and pricing requests,
11 including size (nameplate capacity), type (i.e. solar, wind), and proposed online date.
12 Project names have been withheld to maintain confidentiality of developer
13 information.

14 When this data is overlaid with the number of recent QF contracts declaring a
15 LEO for specific vintage avoided cost prices, it is an alarming percentage. A total of
16 20 QF projects claimed a LEO to secure the pre-August 20, 2014¹² avoided cost
17 prices. The Company is still evaluating these QF contracts based on their LEO
18 declaration but has not executed any contracts as of this filing. Those QFs have not
19 withdrawn their project requests but their QF PPA request submittals were lacking
20 fundamental project and contract details that I will discuss later. The Company is
21 now once again facing this same situation with our recent May 1, 2015, Schedule 37
22 avoided cost price update filing and have an additional fifteen Schedule 37 QF

¹¹*Grouse Creek*, 142 FERC ¶61,187 at 36.

¹² The Oregon Commission issued an order approving a Schedule 37 avoided cost price change on August 20, 2014.

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Witness: Bruce W. Griswold

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

PACIFICORP

Exhibit Accompanying Opening Testimony of Bruce W. Griswold

ERRATA

August 2015

Type	Nameplate Capacity, MW	On-line Date
Geothermal	3.5	10/01/2015
Solar	10.0	12/31/2015
Solar	10.0	12/31/2015
Solar	5.0	12/31/2015
Solar	7.5	12/31/2015
Solar	10.0	12/31/2015
Solar	10.0	12/31/2015
Solar	8.0	12/31/2015
Solar	10.0	12/31/2015
Solar	10.0	12/31/2015
Solar	20.0	10/01/2016
Solar	10.0	12/1/2016
Solar	10.0	12/1/2016
Solar	10.0	12/1/2016
Solar	10.0	12/1/2016
Solar	8.0	12/1/2016
Solar	10.0	12/1/2016
Solar	10.0	12/1/2016
Solar	10.0	12/1/2016
Solar	10.0	12/31/2016
Solar	9.9	12/31/2016
Solar	9.9	12/31/2016
Solar	3.0	12/31/2016
Solar	10.0	12/31/2016
Solar	9.9	12/31/2016
Solar	6.0	12/31/2016
Solar	3.0	12/31/2016
Solar	10.0	12/31/2016
Solar	9.9	12/31/2016
Solar	9.9	12/31/2016
Solar	45.0	12/31/2016
Solar	20.0	12/31/2016
Solar	80.0	12/31/2016
Solar	10.0	12/31/2016
Solar	10.0	12/31/2016
Solar	10.0	12/31/2016
Solar	6.0	12/31/2016
Solar	44.2	01/01/2017
Solar	8.0	12/31/2017
Solar	2.9	12/31/2017
Solar	80.0	11/01/2016