



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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In the Matter of the Application of PacifiCorp
(U 901 E) for Approval of its 2017 Energy Cost
Adjustment Clause and Greenhouse Gas-Related
Forecast and Reconciliation of Costs and Revenue

Application No. 16-08-001
(Filed August 1, 2016)

**MOTION OF PACIFICORP (U 901 E) TO ADMIT INTO
THE RECORD PREVIOUSLY SERVED TESTIMONY AND
ACCOMPANYING EXHIBITS; PROPOSED
ADMINISTRATIVE LAW JUDGE RULING ON THE
MOTION TO ADMIT INTO THE RECORD PREVIOUSLY
SERVED TESTIMONY AND ACCOMPANYING EXHIBITS**

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Dated: October 4, 2016

**BEFORE THE PUBLIC UTILITIES COMMISSION
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In the Matter of the Application of PacifiCorp
(U 901 E) for Approval of its 2017 Energy Cost
Adjustment Clause and Greenhouse Gas-Related
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In accordance with Rule 13.8(d) of the Commission's Rules of Practice and Procedure, and in response to the order of Administrative Law Judge Melissa K. Semcer, PacifiCorp d/b/a Pacific Power (PacifiCorp) respectfully submits this Motion to admit into the record of this proceeding PacifiCorp's previously served testimony and accompanying exhibits. A motion for leave to file under seal confidential information contained in PacifiCorp's testimony and accompanying exhibits is being filed concurrently with this Motion. In an email dated October 3, 2016, ALJ Semcer waived the requirement of Rule 13.8(c) to concurrently serve two copies of the testimony and exhibits to the ALJ. The ALJ and parties were served the testimony and exhibits listed in Section II of this motion on August 1, 2016.

I. INTRODUCTION

On August 1, 2016, PacifiCorp filed *Application of PacifiCorp (U 901 E) for Approval of Its 2017 Energy Cost Adjustment Clause and Greenhouse Gas-Related Forecast and Reconciliation of Costs and Revenue*, Application (A.) 16-08-001, to be effective January 1,

2017. The Office of Ratepayer Advocates (ORA) filed a response to the Application, but “identified no factual issues to protest.”¹ PacifiCorp and ORA are the only parties to this proceeding. These facts were confirmed in a telephonic prehearing conference held on September 28, 2016, before Administrative Law Judge (ALJ) Semcer. Because none of the issues in the Application are in dispute, no additional proceedings are necessary in this matter. At the conclusion of the prehearing conference ALJ Semcer directed PacifiCorp to file a motion to admit its testimony and accompanying exhibits into the record of this proceeding.

II. TESTIMONY SUBJECT TO THIS MOTION

PacifiCorp asks the Commission to admit the following testimony and exhibits submitted in support of A.16-08-001 into the record for this proceeding:

| Exhibit No. | Title | Party | Date Served | Witness |
|--------------------|--|--------------|--------------------|----------------|
| PAC/100 | Direct Testimony of Michael G. Wilding | PacifiCorp | 8/1/2016 | M. Wilding |
| PAC/101 | California ECAC Offset/Balancing Rate Calculation | PacifiCorp | 8/1/2016 | M. Wilding |
| PAC/102 | Net Power Cost Analysis—Adjusted Actual 2015 Net Power Costs | PacifiCorp | 8/1/2016 | M. Wilding |
| PAC/103 | Net Power Cost Analysis—Adjusted Actual/Forecast 2016 Net Power Costs | PacifiCorp | 8/1/2016 | M. Wilding |
| PAC/104 | Net Power Cost Analysis—Forecast 2017 Net Power Costs | PacifiCorp | 8/1/2016 | M. Wilding |
| PAC/105 | 2017 California-allocated Net Power Costs | PacifiCorp | 8/1/2016 | M. Wilding |
| PAC/106 | ARB Administrative Costs (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | M. Wilding |
| PAC/200 | Direct Testimony of Bruce W. Griswold (Redacted and Confidential Versions) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/201 | Commission Template C— | PacifiCorp | 8/1/2016 | B. Griswold |

¹ A.16-08-001, *Response of the Office of Ratepayer Advocates*, p. 1 (Aug. 18, 2016).

| | | | | |
|---------|---|------------|----------|-------------|
| | Weighted Average Cost of Compliance Instruments (Redacted Version and Confidential Version) | | | |
| PAC/202 | Commission Template D-2— Annual GHG Emissions and Associated Compliance Obligations (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/203 | Summary of the GHG Allowance Costs Sub-Balancing Account (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/204 | 2017 Forecast Compliance Obligation and GHG Allowance Costs (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/205 | 2015 Recorded GHG Allowance Revenue (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/206 | 2016 Recorded/Forecast GHG Allowance Revenue (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/207 | Summary of the GHG Allowance Revenue Balancing Account (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/208 | 2017 Forecast GHG Allowance Revenue (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/209 | Commission Template D-5— History of Revenues, Costs, and Emissions Intensity (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | B. Griswold |
| PAC/300 | Direct Testimony of Barbara Modey | PacifiCorp | 8/1/2016 | B. Modey |
| PAC/301 | 2013 – 2016 Recorded/Forecast Customer Outreach Costs | PacifiCorp | 8/1/2016 | B. Modey |
| PAC/302 | 2017 Customer Outreach Activities and Estimated Costs | PacifiCorp | 8/1/2016 | B. Modey |
| PAC/303 | 2017 Forecast Customer Outreach Costs | PacifiCorp | 8/1/2016 | B. Modey |
| PAC/304 | Commission Template D-3— | PacifiCorp | 8/1/2016 | B. Modey |

| | | | | |
|---------|--|------------|----------|----------------|
| | Detail of Outreach Costs | | | |
| PAC/400 | Direct Testimony of Anthony B. Worthington | PacifiCorp | 8/1/2016 | A. Worthington |
| PAC/401 | 2013 – 2016 Recorded/Forecast Administrative Costs | PacifiCorp | 8/1/2016 | A. Worthington |
| PAC/402 | 2017 Forecast Administrative Costs | PacifiCorp | 8/1/2016 | A. Worthington |
| PAC/403 | Commission Template D-3— Detail of Administrative Costs | PacifiCorp | 8/1/2016 | A. Worthington |
| PAC/500 | Direct Testimony of Judith M. Ridenour | PacifiCorp | 8/1/2016 | J. Ridenour |
| PAC/501 | Calculation of Proposed ECAC Adjustment Rates | PacifiCorp | 8/1/2016 | J. Ridenour |
| PAC/502 | GHG Allowance Costs to be Recovered in Rates (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | J. Ridenour |
| PAC/503 | GHG Allowance Revenue to be Distributed Through the California Climate Credit | PacifiCorp | 8/1/2016 | J. Ridenour |
| PAC/504 | Calculation of Proposed GHG Allowance Costs Surcharge and California Climate Credit Rates | PacifiCorp | 8/1/2016 | J. Ridenour |
| PAC/505 | Commission Template D-1— Annual Allowance Revenue Receipts and Customer Returns (Redacted Version and Confidential Version) | PacifiCorp | 8/1/2016 | J. Ridenour |
| PAC/506 | Commission Template D-4— Forecast Revenue Requirement and Revenues by Rate Schedule | PacifiCorp | 8/1/2016 | J. Ridenour |
| PAC/507 | Effects of Proposed Rate Change Distributed by Rate Schedule | PacifiCorp | 8/1/2016 | J. Ridenour |

III. SUPPORT FOR MOVING THE TESTIMONY INTO THE RECORD IN THIS PROCEEDING

Rule 13.8(c) provides in pertinent part that prepared testimony may be offered into evidence by written motion in a proceeding with no evidentiary hearing. No contested issues were present in this proceeding and the Commission did not hold an evidentiary hearing.

Because there is no controversy regarding the Application, there is no need for additional proceedings on this matter. The requirements of Rule 13.8(c) are satisfied. By a separate motion filed the same day as this Motion to Admit into the Record Previously Served Testimony, PacifiCorp requests that those portions of the testimony and exhibits filed under seal as confidential be granted confidential status and remain under seal.

IV. CONCLUSION

PacifiCorp moves to admit its prepared testimony and supporting exhibits in lieu of submitting testimony under direct examination at a hearing. PacifiCorp acknowledges that, unless the Commission expressly provides otherwise, Commission approval of this Motion does not constitute approval or precedent for any principle or issue of law or fact regarding this or any other current or prospective proceeding.

Respectfully submitted October 4, 2016 at San Francisco, California.

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By /s/ Michael B. Day
Michael B. Day

Attorneys for PacifiCorp

DECLARATION OF MATTHEW MCVEE

IN SUPPORT OF MOTION TO ADMIT PREPARED TESTIMONY

I, Matthew McVee, state:

1. I am Assistant General Counsel for PacifiCorp.
2. On August 1, 2016, PacifiCorp submitted its Application for Approval of its 2017 Energy Cost Adjustment Clause and Greenhouse Gas-Related Forecast and Reconciliation of Costs and Revenue (A.16-08-001).
3. In support of its Application, PacifiCorp submitted prepared direct testimony of Michael G. Wilding, Bruce W. Griswold, Barbara Modey, Anthony B. Worthington, and Judith M. Ridenour, along with supporting exhibits sponsored by each witness.
4. PacifiCorp and the Office of Ratepayer Advocates are the only parties to this proceeding.
5. There are no contested issues in this proceeding.
6. The California Public Utilities Commission did not hold an evidentiary hearing in this proceeding.
7. The prepared direct testimony and supporting exhibits listed in PacifiCorp's Motion to Admit Prepared Testimony Into the Record are true and correct.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 4th day of October, 2016, at Portland, Oregon.



Matthew McVee

Assistant General Counsel, PacifiCorp

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**[PROPOSED] ADMINISTRATIVE LAW JUDGE RULING ON THE MOTION TO
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ACCOMPANYING EXHIBITS**

On October 4, 2016, PacifiCorp filed a Motion to Admit into the Record Previously Served Testimony and Accompanying Exhibits, which were submitted in support of A.16-08-001. In accordance with the Commission's Rules of Practice and Procedure, the Commission has considered PacifiCorp's Motion and finds the requested relief appropriate.

Accordingly, it is ORDERED that:

1. PacifiCorp's Motion is granted. PacifiCorp's previously served testimony and accompanying exhibits are accepted into the record.

Dated: _____, 2016 at San Francisco, California.

Melissa K. Semcer, Administrative Law Judge