PACIFIC POWER
A DIVISION OF PACIFICORP

825 NE Multnomah, Suite 2000
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August 6, 2013

VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RE: UE-130043—PacifiCorp's Motion to File Supplemental Testimony
Supplemental Rebuttal Testimony & Exhibit

PacifiCorp d/b/a Pacific Power & Light Company submits for filing a Motion to File Supplemental Testimony along with its Supplemental Rebuttal Testimony and Exhibit in the above-referenced proceeding.

Please direct any informal inquiries regarding this filing to Bryce Dalley, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6389.

Sincerely,

William R Griffith/GWT

William R. Griffith
Vice President, Regulation

Enclosures

cc: Service List UE-130043

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, Complainant, v. PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY, Respondent.	**Docket No. UE-130043** **PACIFICORP'S MOTION TO FILE SUPPLEMENTAL TESTIMONY**

RELIEF REQUESTED

1 Under WAC 480-07-375(1)(d) and WAC 480-07-460(1)(b)(ii), PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company), moves the Washington Utilities and Transportation Commission (Commission) for an order authorizing PacifiCorp to file supplemental testimony. As allowed by WAC 480-07-460(1)(b)(ii), the Company's proposed supplemental testimony, identified as Exhibit No.___(GND-11T), accompanies this motion.

2 The Company's supplemental testimony provides to the Commission and the parties an important historical document related to the purpose of the Direct Current (DC) Intertie contract between PacifiCorp and the Bonneville Power Administration (BPA). The Company found this document, a copy of a Letter of Understanding (LOU) between PacifiCorp and BPA executed on May 28, 1993, in its document archives only one day before the rebuttal testimony was due. At that point, PacifiCorp did not have the ability to include it in the discussion of the DC Intertie contract in Mr. Duvall's rebuttal testimony.

Instead, PacifiCorp prepared supplemental testimony as quickly as practicable and prepared this motion requesting leave to make the filing.

3 The supplemental testimony will ensure that the Commission has the best available evidence upon which to decide the issues in this case. Because the supplemental testimony "includes substantive changes other than to simply correct errors of fact asserted by a witness" PacifiCorp must "seek leave from the presiding officer by written motion . . . to submit testimony."[1]

4 When deciding whether to grant a motion to file supplemental testimony, the Commission observed that its "paramount interest is in having a full record with the best available evidence upon which to base its decisions."[2] Thus, when a party "offers supplemental evidence, as here, the Commission balances its interest in having up-to-date information against the needs of the parties to have adequate opportunities for discovery and the development of their own testimony and exhibits."[3]

5 Here, the Company's supplemental testimony explains and provides a copy of the LOU. As described in the supplemental testimony, the terms of the LOU relate directly to the Company's ability to terminate the DC Intertie contract and provide important context for the Company's decision to enter into the DC Intertie contract. Both Staff and Boise White Paper, LLC (Boise) propose adjustments to the Company's filed case related to the DC

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[1] WAC 480-07-460(1)(b)(ii).
[2] *Wash. Utils. & Transp. Comm'n v. Puget Sound Energy, Inc.*, Docket UE-072300, Order 08 ¶ 10 (May 5, 2008); *see also Wash. Utils. & Transp. Comm'n v. Avista Corp.*, Docket UE-080416, Order 04 (Aug. 8, 2008) (applying the same balancing test); *Wash. Utils. & Transp. Comm'n v. Puget Sound Energy, Inc.*, Docket UE-111048, Order 07 (Jan. 27, 2012) (granting motion to supplement record to include recently identified customer "given the importance of a full and complete record"); *Re Verizon Communications Inc. and Frontier Communications Corp.*, Docket UT-090842, Order 03 (Aug. 18, 2003) ("The supplemental testimony and exhibits filed with Verizon and Frontier's motion promote the Commission's interest in having a full record on which to base its decision.")
[3] *Id.*

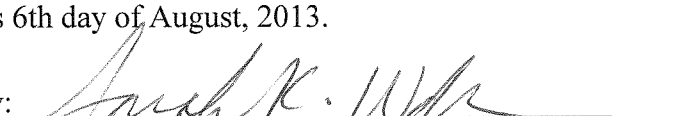
Intertie contract.[4] Therefore, to have a full and complete record and the best evidence upon which the Commission can analyze the proposed adjustments, the Company's motion should be granted.

6 Moreover, the Company's filing will not prejudice other parties. The Company's supplemental testimony is being filed just two business days after the Company's rebuttal testimony filing. The supplemental testimony addresses only the DC Intertie contract issue and is just a few pages long. The hearing in this case is set to begin on August 26, 2013, and parties will have a sufficient opportunity to conduct discovery and cross-examination related to this supplemental testimony prior to the hearing.

CONCLUSION

7 PacifiCorp respectfully requests that the Commission grant PacifiCorp's motion to allow the filing of the Company's supplemental testimony and accompanying exhibit, Exhibit No.___(GND-11T) and Exhibit No.___(GND-12). The supplemental testimony ensures that the record in this case is fully developed and does not compromise other parties' ability to conduct discovery or prepare for hearing.

Respectfully submitted this 6th day of August, 2013.

By: 

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[4] *See* Exhibit No.___(DCG-1CT) at pages 20-22; Exhibit No.___(MCD-1CT) at page 8.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding by electronic mail.

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DATED at Portland, OR this 6th day of August 2013.

Carrie Meyer
Supervisor, Regulatory Operations