

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFIC POWER & LIGHT
COMPANY,

Petition For a Rate Increase Based on a
Modified Commission Basis Report, Two-
Year Rate Plan, and Decoupling
Mechanism.

DOCKET NO. UE-152253

DECLARATION OF SARAH E.
KAMMAN IN SUPPORT OF
PACIFIC POWER'S RESPONSE TO
STAFF'S MOTION FOR LEAVE TO
FILE SUPPLEMENTAL
TESTIMONY AND EXHIBITS

1 I, SARAH E. KAMMAN, hereby declare under penalty of perjury under the laws
of the State of Washington that the following is true and correct:

2 I am the Vice President and General Counsel for Pacific Power & Light Company
(Pacific Power or Company), a division of PacifiCorp. I have personal knowledge of the
matters set forth in this Declaration and, as to matters that call for an opinion, state my
opinion on information and belief based on my professional experience.

3 The purpose of this declaration is to support the Company's response to Staff's
Motion for Leave to File Supplemental Testimony and Exhibits (Motion). I provide a
factual summary of the discovery process in this case to refute Staff's claim that the
Company withheld Bridger Coal Company (BCC) mine plans related to the Company's
decision to invest in Selective Catalytic Reduction (SCR) systems at Units 3 and 4 of the
Jim Bridger plant. I demonstrate that the Company provided correct and complete
responses to Staff's data requests.

Staff's Receipt of the January 2013 Mine Plan.

4 Staff's first data request relating to BCC mine plans was Staff's Data Request
No. 11 (WUTC 11), which was issued on January 6, 2016. In that request, Staff referred

to page 20, lines 14-21, of the direct testimony of Mr. Rick T. Link, which described the Company's updated SCR analysis based on the September 2013 Official Forward Price Curve (OFPC).¹ Staff then asked:

[W]hen the Company considered the impact of the 2013 official forward price curve (OFPC) for natural gas on its analysis of selective catalytic reduction (SCR) at Bridger, were the increased costs for Bridger's coal supply that were identified in the Bridger Coal Company's (BCC) 2013 Mine Plan also considered? If so, please provide documentation of how the increased coal costs were included and their impact on the analysis.

5 On January 20, 2016, the Company responded to WUTC 11 as follows:

The coal costs listed in Confidential Exhibit RTL-3C incorporated the cost increases reported in Bridger Coal Company's (BCC) 2013 Mine Plan. There were no significant increases between then and the time of the September 2013 official forward price curve (OFPC).

6 The Company's response states that what the Company described as the "2013 Mine Plan" was incorporated into the coal costs that were used in the Company's SCR analysis (*i.e.*, Exhibit RTL-3C). The SCR analysis in this case was prepared in early 2013, using the January 2013 mine plan.²

7 Staff next issued Staff Data Request No. 99 (WUTC 99) on January 27, 2016.³ WUTC 99 referenced the Bridger SCRs and requested the "Jim Bridger Mine's 2013 Mine Plan, as well as forward-looking costs for the mine's output that were identified in

¹ Twitchell, Exh. No. JBT-13.

² The Company's decision-making documentation for the Bridger SCRs, attached to Staff's testimony as Exhibit No. JBT-10C, explains that the SCR analysis reflected coal costs updated in early 2013. Twitchell, Exh. JBT-10C 22.

³ WUTC 99 is attached to the Declaration of Jeremy B. Twitchell that was filed on April 25, 2016.

that plan.”⁴ Based on Staff’s reference to the SCRs, the Company reasonably concluded that Staff was requesting a copy of the January 2013 mine plan used in the SCR analysis.⁵

8 On February 10, 2016, the Company provided its response to WUTC 99, which indicated that the “2013 Mine Plan” had been produced in response to Sierra Club Data Request No. 1.8(a) (Sierra Club 1.8(a)), which was originally provided to Staff on January 20, 2016. Sierra Club 1.8(a) requested the work papers supporting Exhibit RTL-5C, which reflects the BCC mine capital costs the Company used in its SCR analysis.⁶ The Excel files to which Staff was directed were entitled “BCC Production-Operating Cost Schedules (2 unit)” and “BCC Production-Operating Cost Schedules (4 unit).” The full text of the request and response of Sierra Club 1.8 is included here as Attachment 1.

9 Although the electronic files provided in response to Sierra Club 1.8(a) do not state in their title that they are the January 2013 mine plan, there is evidence within the files indicating that they were prepared in January 2013. For example, the forward-looking coal costs included in the file called “BCC Production-Operating Cost Schedules (4 unit)” begin in January 2013 and are described as “projected” amounts.⁷ In addition, the source data within the file indicates that it was prepared on January 18, 2013.⁸ Sierra Club witness Jeremy I. Fisher also identified the response to Sierra Club 1.8(a) as the source of the January 2013 mine plan in his work papers, served on March 18, 2016.

⁴ *Id.*

⁵ Ralston, Exh. No. DR-CT 2:14-17 (stating that the SCR analysis relied on the January 2013 long-term fuel plan).

⁶ Link, Exh. No. RTL-1CT 8:2-4.

⁷ See Attachment 2, which is a redacted screen shot of a sample of the plan that Mr. Twitchell understood to be the October 2013 mine plan.

⁸ For example, the cell P34 in tab “CY Yrs 1-3” is linked to another Excel file identified as “V:\Fuels\GENERAL\IRP\CPCN 1-18-2013\Two DL Rev\Two DL\Opt 2B\OPEX-CAPEX\2012 LOM Mine Plan Sumstat - Opt 2B.xlsx]CY12to15 SURFACE!P34” A similar source is identified for numerous other inputs to the plan.

Staff's Receipt of the October 2013 Mine Plan.

10 The Company provided Staff with the October 2013 mine plan on January 27, 2016, in its supplemental response to Sierra Club Data Request No. 1.6 (Sierra Club 1.6–1st Supplemental). Sierra Club had originally requested copies of testimony and work papers filed by Cindy Crane in the 2014 Utah rate case. On January 20, 2016, the Company provided Ms. Crane's Utah testimony. Ms. Crane's Utah testimony refuted the argument made by Sierra Club in that case that the October 2013 mine plan indicated higher coal costs than were included in the SCR analysis.⁹ Her testimony described the October 2013 mine plan and made clear that it was unrelated to the SCR analysis. The testimony also specifically indicated that the October 2013 mine plan was included Ms. Crane's work papers.¹⁰ Following clarification from Sierra Club, on January 27, 2016, the Company provided supporting work papers for Ms. Crane's Utah testimony. The responses to Sierra Club Data Request No. 1.6 and Sierra Club 1.6–1st Supplemental are included as Attachment 3.

11 Within the work papers provided in response to Sierra Club 1.6–1st Supplemental is an electronic folder entitled "BCC Budget 10-4-2013." Within that folder was single folder called "OPEX-CAPEX," and within that folder were a number of Excel spreadsheets. The file that contained the October 2013 mine plan was the first document in the folder and was entitled "01 OpsCostSchedule." Included as Attachment 4 to this Declaration is a screen shot showing how the mine plan could be located within the response.

⁹ A redacted version of Ms. Crane's June 2014 Utah testimony is included in the record in this case as an exhibit to Sierra Club witness Jeremy I. Fisher's response testimony. *See* Fisher, Exh. No. JIF-8.

¹⁰ Fisher, Exh. No. JIF-8 3:66-4:71.

12 The October 2013 mine plan was also provided to Staff as part of Dr. Fisher’s work papers, which were served on March 18, 2016. The work papers included an Excel file entitled “Synapse Adjustment 1–October 2013 Coal Plan 03172016–CONF.” The October 2013 mine plan was included in this work paper under a tab entitled “UT GRC Oct 2013 BCC OPEX.” The October 2013 mine plan was included as part of Dr. Fisher’s work papers because he relied on that plan as support for his own proposed adjustment to the Company’s SCR analysis.

13 Staff was again provided the October 2013 mine plan on Saturday, April 16, 2016, when counsel for Pacific Power electronically forwarded Dr. Fisher’s work papers to Staff’s counsel. On Friday, April 15, 2016, Staff counsel Jennifer Cameron-Rulkowski emailed Katherine McDowell asking that Pacific Power update its response to WUTC 99 by providing a copy of the October 2013 mine plan to Staff.¹¹ In the email, Staff explained that it assumed that the mine plan provided in response to WUTC 99 was the October 2013 mine plan, *i.e.*, the “plan that Pacific Power witness Cindy Crane referred to [in the 2014 rate case] as ‘the most recent BCC mine plan, which was finalized in October 2013.’”¹² On Saturday, April 16, 2016, the Company responded to Staff’s email, explaining how the Company had correctly responded to WUTC 99, identifying where Staff could find the October 2013 mine plan in data responses and work papers, and attaching Dr. Fisher’s work papers and an explanation of where the October 2013 mine plan could be found within Dr. Fisher’s work papers.¹³

¹¹ The full email exchange is included as Attachment 5.

¹² Attachment 5.


¹³ *Id.*

14 Three days later, on April 19, Staff's counsel responded and indicated that, "Staff has reviewed [the Company's] explanation and determined that we now have a complete response to the data request. We much appreciate your prompt attention to this matter."¹⁴

15 Staff did not raise this issue again with the Company until Monday, April 25, when Staff informed the Company that it would be filing its Motion. Staff informed the Company of its intent to file the Motion at 3:30 p.m. that day by email, and did not ask the Company for its position on the Motion or otherwise seek to confer.¹⁵ Staff filed the Motion approximately 90 minutes later.¹⁶

16 Upon receipt of the motion on April 25, 2016, counsel for Pacific Power immediately requested a copy of the testimony from Staff, stating that the Company could not evaluate and respond to the Motion without this information. Pacific Power also asked Staff how voluminous its proposed testimony would be; Staff could not provide this information to Pacific Power. On Tuesday, April 26, Staff informed Pacific Power it did not plan to provide a copy of the testimony to Pacific Power before the Commission ruled on the Motion.¹⁷

Executed this 27th day of April, 2016, at Portland, Oregon.


Sarah E. Kamman

¹⁴ *Id.*

¹⁵ Attachment 6 at 1.

¹⁶ *Id.* at 2-3.

¹⁷ *Id.* 2.

UE-152253 / Pacific Power & Light Company

January 20, 2016

Sierra Club 1st Set Data Request 1-8

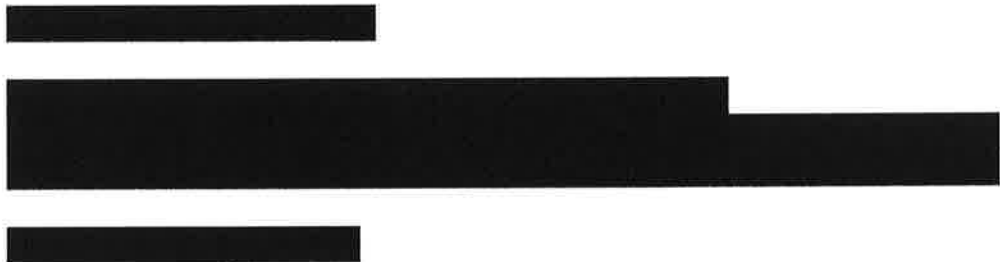
Sierra Club Data Request 1-8

Refer to Exhibit RTL-5C (“Jim Bridger Coal Company Mine Capital Costs: Million\$ Inclusive of AFUDC”).

- (a) Provide a fully functional copy of the work papers that generate the mine capital costs for 4-unit and 2-unit operation, with formulae and links intact.
- (b) Provide annual Jim Bridger Coal Company mine capital costs incurred between 2008 and the present day, by year.
- (c) For any year between 2008 and the present day where coal mine capital costs were in excess of \$25 million, identify the docket or proceeding before the Washington Utilities and Transportation Commission where the company sought recovery for capital expenses incurred, and identify the witness or witnesses who enumerated and/or defended such costs.
- (d) Provide the unredacted testimony of witnesses for all of the dockets identified in (c), above.
- (e) For any year between 2008 and the present day where coal mine capital costs were in excess of \$25 million, identify due diligence and economic assessments performed by the company to support such investments.
- (f) Provide documentation and assessments identified in (e), above.

Response to Sierra Club Data Request 1-8

- (a) Please refer to Confidential Attachment Sierra Club 1.8-1.
- (b) Please refer to the confidential Bridger Coal Company (BCC) capital costs in the table below:

The table content is completely redacted with black bars. It appears to be a table with multiple rows and columns, but no data is visible.

- (c) Capital expenditures at BCC (PacifiCorp two-thirds share) exceeded the \$25 million threshold only in 2009. These costs were presented in the Company’s 2008 general rate case (Docket UE-080220) and 2009 general rate case (Docket UE-090205). Mr. R. Bryce Dalley was the revenue requirement witness in both of these cases.

- (d) Please refer to Attachment Sierra Club 1.8-2.
- (e) Capital expenditures (PacifiCorp two-thirds share) exceeded the \$25 million threshold only in 2009. Please refer to Confidential Attachment Sierra Club 1.8 –2, which identifies each capital project and the associated costs/expenditures in 2009. The attachment identifies 124 projects. In accordance with Company practice, economic assessments are prepared for projects in excess of \$1 million. Six capital items (representing 49 percent of total capital spending in 2009) meet this threshold. Please refer to Confidential Attachment Sierra Club 1.8–3 for the economic analyses or capital authorization documents supporting the capital expenditures for these six projects.
- (f) Please refer to Confidential Attachment Sierra Club 1.8–3 for the economic analyses or capital authorization documents supporting the capital expenditures for the six projects identified in the Company’s response to subpart (e) above.

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: Chuck Moulton

SPONSOR: To be determined

BCC Production Operating Cost Schedules (4 unit) [Shared] - Excel

File Home Insert Page Layout Formulas Data Review View Tell me what you want to do

Clipboard Font Alignment Number Conditional Formatting Styles Cells Editing

035 =V:\Fuel\GENERAL\RR\CPON-1-18-2013\Two DL Rev\Two DL\Opt 28\DPB-CAPEX\2012 LOM Mine Plan Sumstat - Opt 28.xlsx!C12:O15 SURFACE!035

	A	O	P	Q	R	S	T	U	V	W	X	Y
1	BRIDGER COAL COMPANY											
2	LOM Opt 2B											
3	SUMMARY OF STATISTICS FOR SURFACE MINE											
4												
5	102 Dragline half 4x4 beginning Oct 1, 2012; 103 Dragline half 4x4 beginning Apr 1, 2013											
6	Begins with September 2012 Forecast											
7	11/1/2012 10:00 AM											
8		PROJ.	PROJ.	PROJ.	PROJ.	PROJ.	PROJ.	PROJ.	PROJ.	PROJ.	PROJ.	PROJ.
9		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13
35	PM SHIFTS SCHEDULED											
36	DEADHEAD SHIFTS SCHEDULED											
37	YARDS PER SHIFT											
38	RATED BUCKET SIZE - YDS											
39	DRAG. PROD. INDEX (ACT)											
40	DRAG. PROD. INDEX(PLAN)											
41	PASSES PER SHIFT											
42	SUBTOTAL-DL STRIPPING											
43	BANK YARDAGE											
44	REHANDLE YARDAGE											
45	FINAL RECLAMATION											

Ready Circular Reference: W963

CV Yrs 1-3 Coal Yrs 1-3 CV Yrs 4 and Beyond Coal Yrs 4 and Beyond Employees Electricity Surface Inv

115%

Sierra Club Data Request 1-6

Provide unredacted copies of Cindy Crane's testimony and work papers in Utah Docket 13-035-184 ("In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations").

Response to Sierra Club Data Request 1-6

The Company objects to this request as not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, the Company responds as follows:

Please refer to Confidential Attachment Sierra Club 1.6, which provides unredacted copies of Cindy Crane's Direct Testimony and Rebuttal Testimony in Docket 13-035-184. Work papers were not filed with Cindy Crane's testimony in the above referenced docket.

PREPARER: N/A

SPONSOR: N/A

Sierra Club Data Request 1-6

Provide unredacted copies of Cindy Crane’s testimony and work papers in Utah Docket 13-035-184 (“In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations”).

Sierra Club Data Request 1-6 - 1st Supplemental

On January 26, 2016, Sierra Club clarified its request for work papers, specifically requesting copies of the files submitted as filing requirement R.746-700-23.c.8.f in Utah Docket 13-035-184. Sierra Club further clarified that the response can be limited to files that include information related to the Jim Bridger plant or mine.

1st Supplemental Response to Sierra Club Data Request 1-6

The Company continues to object to this request on the basis that it requests information related to time periods and a jurisdiction not relevant to this proceeding and, therefore, is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection the Company provides the following supplemental response:

Please refer to Confidential Attachment Sierra Club 1.6 1st Supplemental for a copy of files submitted as filing requirement R.746-700-23.c.8.f in Utah Docket 13-035-184 related to the Jim Bridger plant or mine.

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: N/A

SPONSOR: N/A

act Sierra Club 1.6 1st SUPP CONF ▶ C8.f Conf ▶ BCC Budget 10-4-2013 ▶ OPEX-CAPEX

Search OPEX-CAPEX

New folder

- 01 OpCostSchedules
- 02 SumStat
- 03 Labor- SURF
- 04 Labor- UG
- 05 Explosives 2024-2037
- 05 Explosives
- 06 CC Detail- SURF
- 07 Fleet CC Detail- SURF
- 08 Ops Supplies- UG
- 09 OH- UG
- 10 Maint- UG
- 11 OS- SURF
- 12 OS- UG
- 13 Other Exp- UG
- 14 Depr Exp 10YP
- 15 LW Cycles
- 16 CC 1420 - UG (surf) Conveyors-Coal Handling
- 17 Cap Dev Calc REVI
- 18 Healthcare_Cost_Analysis 5-27-11
- 2012-2022 OPTION 3 SUM - Surface Maint. Parts
- 2014 Budget Capital (final - ug)
- 2014 Capex LOM Worksheets (final)
- 2014 Capex LOM Worksheets
- BCC Assumptions
- BLS Data
- Carlson UG Data 4-2-13(2014 budget)
- Carlson UG Data 9-5-13
- Coal Quality Royalty 10-2013
- Coal Quality Royalties
- Coal Quality Royalty 9-2013
- Coal Royalty-Surf Uncovered 10-3-13
- Contractor Final Closure DB
- D&B Final Closure Contractor
- Escalation Rates 4-25-13
- Escalation Rates 9-19-13
- Fuel Price and Index Fcst Master Sept
- Fuel Price and Index Fcst Master4-17-13
- Highwall Reduction Blasting Yards
- Historical Water thru Clarifier
- Mild Columbia C
- Scrapper Cost per BCY
- UG OpSupp Comparison
- UG Roof Support Pricing 2-2013
- UG Roof Support Pricing Aug13-Feb14

Offline status: Online

Offline availability: Not available

Katherine McDowell

From: Cameron-Rulkowski, Jennifer (UTC) <jcameron@utc.wa.gov>
Sent: Tuesday, April 19, 2016 11:01 AM
To: Katherine McDowell
Cc: Matthew McVee; Casey, Chris (UTC)
Subject: RE: UE-152253 - Supplementing response to UTC Staff Data Request No. 99 - Pacific Power response with confidential workpaper

Good morning, Katherine,
Staff has reviewed your explanation and determined that we now have a complete response to the data request. We much appreciate your prompt attention to this matter.
Regards,

Jennifer Cameron-Rulkowski
Assistant Attorney General
Wash. State Attorney General's Office, UTC Division
P.O. Box 40128
Olympia, WA 98504-0128
Tel.: (360) 664-1186
Fax: (360) 586-5522

Overnight deliveries only:
1400 S. Evergreen Pk. Dr. SW
Olympia, WA 98504-0128

From: Cameron-Rulkowski, Jennifer (UTC)
Sent: Monday, April 18, 2016 4:14 PM
To: 'Katherine McDowell' <katherine@mrg-law.com>
Cc: Matthew McVee <matthew.mcvee@pacificcorp.com>; Casey, Chris (UTC) <ccasey@utc.wa.gov>
Subject: RE: UE-152253 - Supplementing response to UTC Staff Data Request No. 99 - Pacific Power response with confidential workpaper

Thank you very much for this detailed explanation. We have provided it to Staff for further review.
Regards,

Jennifer Cameron-Rulkowski
Assistant Attorney General
Wash. State Attorney General's Office, UTC Division
P.O. Box 40128
Olympia, WA 98504-0128
Tel.: (360) 664-1186
Fax: (360) 586-5522

Overnight deliveries only:
1400 S. Evergreen Pk. Dr. SW
Olympia, WA 98504-0128

From: Katherine McDowell [<mailto:katherine@mrg-law.com>]
Sent: Saturday, April 16, 2016 1:47 PM
To: Cameron-Rulkowski, Jennifer (UTC) <jcameron@utc.wa.gov>; Casey, Chris (UTC) <ccasey@utc.wa.gov>

Cc: Matthew McVee <matthew.mcvee@pacificorp.com>

Subject: RE: UE-152253 - Supplementing response to UTC Staff Data Request No. 99 - Pacific Power response with confidential workpaper

Jennifer, thanks for your email. The Company is committed to providing all of the data Staff needs to review the Company's filing. In this case, we can confirm that the Company's response to WUTC 99 is correct and complete and explain where Staff can locate the October 2013 mine plan in the discovery and workpapers in this case.

The subject of WUTC 99 was "Bridger Selective Catalytic Reduction." The request asked for "Jim Bridger Mine's 2013 Mine Plan, as well as forward-looking costs for the mine's output that were identified in that plan." The Company reasonably construed this request as asking for the mine plan that supported the Company's SCR analysis in this case, the January 2013 mine plan. In its response, the Company referenced Sierra Club 1.8(a), where the Company produced the January 2013 mine plan on January 20, 2016. As background, Sierra Club 1.8(a) asked for support for the 4-unit and 2-unit capital costs in RTL-5C, which is a part of the SCR analysis. Sierra Club 1.8(a)'s language makes clear that the Company was providing the mine plan used in the SCR analysis (i.e. the January 2013 mine plan, not a mine plan produced later in 2013).

WUTC 99 did not ask the Company for the October 2013 mine plan referenced in Cindy Crane's rate case testimony in docket UE-140762. Had Staff made this request, the Company would have referred Staff to Sierra Club supplemental response 1.6(a), where the Company produced the October 2013 mine plan (which was also used in the Company's 2014 Utah rate case) on January 27, 2016. See Exh. No. JIF-1CT 16 at footnote 42.

In addition to this data request response, Staff can locate the October 2013 mine plan in the workpapers served in this case. Dr. Fisher included the October 2013 mine plan provided in Sierra Club 1.6 (a) in his confidential workpapers, served March 18, 2016. I have attached the relevant confidential workpaper; please see tab UT GRC Oct 2013 BCC OPEX.

I hope this explanation fully responds to your request regarding WUTC 99. If not, please contact me immediately so we can provide any additional information Staff requires.

Best regards, Katherine

Katherine McDowell
McDowell Rackner & Gibson PC
419 SW 11th Ave, Suite 400
Portland, OR 97205

Direct: (503) 595-3924
Cell: (503) 423-7272
katherine@mrg-law.com

From: Cameron-Rulkowski, Jennifer (UTC) [<mailto:jcameron@utc.wa.gov>]

Sent: Friday, April 15, 2016 4:19 PM

To: Katherine McDowell <katherine@mrg-law.com>; Matthew McVee <matthew.mcvee@pacificorp.com>

Cc: Casey, Chris (UTC) <ccasey@utc.wa.gov>

Subject: Re: UE-152253 - Supplementing response to UTC Staff Data Request No. 99

Dear Ms. McDowell and Mr. McVee,

In keeping with WAC 480-07-405, Staff asks that Pacific Power please supplement its response to UTC Staff Data Request No. 99 immediately. WAC 480-07-405, subsection 8, provides that "[p]arties must immediately supplement any

response to a data request, record requisition, or bench request upon learning that the prior response was incorrect or incomplete when made or upon learning that a response, correct and complete when made, is no longer correct or complete.”

In UTC Staff Data Request No. 99, Staff requested that Pacific Power “provide the Jim Bridger Mine’s 2013 Mine Plan, as well as forward-looking costs for the mine’s output that were identified in that plan.” Staff understood that the mine plan provided was the plan that Pacific Power witness Cindy Crane referred to as “the most recent BCC mine plan, which was finalized in October 2013,” in her testimony in the UE-140762 general rate case. See Docket UE-140762, Exh. No. CAC-1CT 7:5-7.

On rebuttal, Pacific Power witness Dana Ralston explained “that BCC developed two mine plans in 2013, one in January 2013, which the Company used in the SCR analysis and generally referred to as the ‘2013 mine plan,’ and a second mine plan in October 2013.” Exh. No. DR-1CT 4:5-8.

Staff has now discovered that Pacific Power provided the January 2013 plan in response to UTC Staff Data Request No. 99 but did not provide the October 2013 plan. Accordingly, Staff asks that the company supplement its response and immediately provide the October 2013 mine plan.

Regards,

Jennifer Cameron-Rulkowski
Assistant Attorney General
Wash. State Attorney General’s Office, UTC Division
P.O. Box 40128
Olympia, WA 98504-0128
Tel.: (360) 664-1186
Fax: (360) 586-5522

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1400 S. Evergreen Pk. Dr. SW
Olympia, WA 98504-0128

Katherine McDowell

From: Cameron-Rulkowski, Jennifer (UTC) <jcameron@utc.wa.gov>
Sent: Monday, April 25, 2016 3:30 PM
To: Katherine McDowell
Cc: Casey, Chris (UTC)
Subject: Pacific Power

Katherine,

I wanted to let you know that staff is filing a motion for leave to supplement Jeremy Twitchell's testimony. It will be filed shortly.

Regards,

Jennifer Cameron-Rulkowski

Sent from my iPhone

Katherine McDowell

From: Cameron-Rulkowski, Jennifer (UTC) <jcameron@utc.wa.gov>
Sent: Tuesday, April 26, 2016 9:21 AM
To: Katherine McDowell
Subject: Re: UE-152253 - Pacific Power 2015 GRC - Staff Request - CONFIDENTIAL

Good morning, Katherine,
We are anticipating an expeditious ruling from the judge, given the fast-approaching hearing. If the motion is granted, we plan to file testimony shortly thereafter.
Sincerely,
Jennifer

Sent from my iPhone

On Apr 25, 2016, at 6:12 PM, Katherine McDowell <katherine@mrg-law.com> wrote:

Jennifer, We have reviewed your motion. Based on our discussion this afternoon, I understood that we would be receiving Staff's proposed supplemental testimony today, as part of your filing. We cannot formulate a response to your motion without your proposed testimony, compounding the procedural problems the motion presents. In our discussion, you acknowledged the burden on Staff to move quickly to provide its supplemental testimony to us. Please let me know tonight when you plan to do this. Thank you. Katherine

Katherine McDowell
McDowell Rackner & Gibson PC
419 SW 11th Ave, Suite 400
Portland, OR 97205

Direct: (503) 595-3924
Cell: (503) 423-7272
katherine@mrg-law.com

From: DeMarco, Betsy (UTC) [<mailto:bdeMarco@utc.wa.gov>]
Sent: Monday, April 25, 2016 4:55 PM
To: Friedlander, Marguerite (UTC) <mfriedla@utc.wa.gov>
Cc: Katherine McDowell <katherine@mrg-law.com>; matthew.mcvee@pacificcorp.com; Son, Ariel (Ariel.Son@PacifiCorp.com) <Ariel.Son@PacifiCorp.com>; Siores, Natasha <Natasha.Siores@pacificcorp.com>; bryce.dalley@pacificcorp.com; washingtondockets@pacificcorp.com; datarequest@pacificcorp.com; Cameron-Rulkowski, Jennifer (UTC) <jcameron@utc.wa.gov>; Oshie, Patrick (UTC) <poshie@utc.wa.gov>; Beattie, Julian (UTC) <jbeattie@utc.wa.gov>; Casey, Chris (UTC) <ccasey@utc.wa.gov>; Gross, Krista (UTC) <kgross@utc.wa.gov>; ffitich, Simon (ATG) <SimonF@ATG.WA.GOV>; Gafken, Lisa (ATG) <LisaW4@ATG.WA.GOV>; jec@dvclaw.com; travis.ritchie@sierraclub.org; gloria.smith@sierraclub.org; Mak, Chanda (ATG) <ChandaM@ATG.WA.GOV>; Bostelle, Kym (ATG) <KymH@ATG.WA.GOV>; 'bmpurdy@hotmail.com' (bmpurdy@hotmail.com) <bmpurdy@hotmail.com>; jog@dvclaw.com; O'Connell, Elizabeth (UTC) <eoconnel@utc.wa.gov>; tds@dvclaw.com; brmullins@mwanalytics.com; joni@nwenergy.org; wendy@nwenergy.org; Lisa Rackner <lisa@mrg-law.com>; Adam Lowney <adam@mrg-law.com>
Subject: RE: UE-152253 - Pacific Power 2015 GRC - Staff Request - CONFIDENTIAL

I have attached an electronic copy of Staff's Request to File Supplemental Testimony, which we filed today with the Commission. Paper copies have been sent to the Parties by U.S. mail.

PLEASE NOTE: The documents attached hereto contain CONFIDENTIAL information and should be shared only with those persons who have signed and filed the appropriate confidentiality agreement with the Commission.

Betsy DeMarco
Legal Assistant
AGO/UTC
360-664-1191

Print only when necessary, please.