



1           4.       The AURORA model is a proprietary model owned by EPIS, Inc. (“EPIS”). As  
2 indicated on the EPIS website, the cost to obtain a full license to use AURORA is at least  
3 \$51,500. Based on a long-standing relationship between RCS and EPIS, other pricing options  
4 have also been discussed on a confidential basis.

5           5.       It is necessary to have access to the model used by PSE to test and understand the  
6 inputs and assumptions that are used to generate the calculations for net power costs, and to  
7 propose adjustments to PSE’s calculations of its net power costs.

8           6.       PacifiCorp and Portland General Electric Company both provide access to their  
9 power cost models at no cost.

10          7.       ICNU and I collaborated with Avista Corporation (“Avista”) to obtain access to  
11 the AURORA model through a computer at Avista dedicated to use by ICNU. I will be able to  
12 access the dedicated computer and run the AURORA model through a virtual private network  
13 during the pendency of the Avista GRC. Access to AURORA for the Avista GRC is provided  
14 through Avista’s license, and ICNU will not be assessed any licensing fees.

15          8.       ICNU has attempted to negotiate with PSE to obtain access to AURORA on terms  
16 similar to those provided by Avista, and PSE has, to date, refused to cooperate.

17          9.       I cannot effectively review the power cost issues in the rate case without full  
18 access to the AURORA model. It is burdensome and inadequate to have PSE run the model for  
19 me.

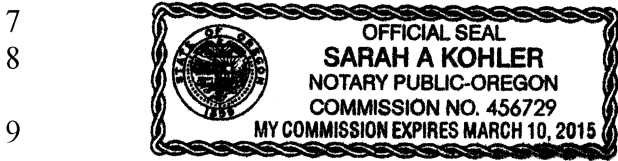
20          10.       The cost of obtaining a full license to use AURORA for the PSE 2011 GRC,  
21 \$51,500, is an unreasonable and burdensome expense for an intervenor.

1 SIGNED THIS 6th day of June, 2011, at Portland, Oregon.

2 Donald W. Schoenbeck

3 DONALD W. SCHOENBECK  
4 State of Oregon  
5 County of Multnomah

6 SUBSCRIBED AND SWORN to before me this 6th day of June, 2011.



Sarah Kohler  
NOTARY PUBLIC FOR OREGON

My Commission Expires: 5/10/2015