

**DECLARATION OF
ETTA LOCKEY (PACIFICORP)**

1. My name is Etta Lockey. My business address is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232.

2. I am Vice President, Regulation for PacifiCorp d/b/a Pacific Power (PacifiCorp). PacifiCorp is a multi-jurisdictional utility providing electric retail service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp serves approximately 45,000 customers in portions of Del Norte, Modoc, Shasta, and Siskiyou Counties in northern California.

3. This declaration is based on my information and belief and is submitted in accordance with General Order (GO) 66-D of the California Public Utilities Commission (Commission).

4. Section 3.2 of GO 66-D provides that when a utility submits documents for which it seeks confidential treatment to the Commission or staff of the Commission outside of a formal proceeding, the utility must mark the document or applicable portions thereof confidential and provide the basis for confidential treatment specified. Additionally, any such request must be accompanied by a declaration signed by an officer of the requesting entity. While PacifiCorp's general rate case application is a formal proceeding, testimony, exhibits, and workpapers are not formally entered into the record or formally submitted to the Commission until the close of evidentiary hearings. PacifiCorp is therefore providing this declaration along with the confidential information.

5. On November 20, 2018, PacifiCorp filed its rebuttal testimony in its 2019 General Rate Case Application, A.18-04-002.

6. In compliance with the Commission's Rules of Practice and Procedure Rule 1.9(a), PacifiCorp is serving two copies of the rebuttal testimony and exhibits on Administrative Law Judge Eric Wildgrube. PacifiCorp is also providing a copy of the testimony and exhibits to the Commission's Public Advocates Office.

7. I have reviewed the rebuttal testimony and exhibits supporting PacifiCorp's application and determined that certain information is confidential. Accordingly, PacifiCorp is asserting a claim of confidentiality with respect to the testimony and exhibits of the following witnesses as described below.

8. PacifiCorp is asserting a claim of confidentiality with respect to portions of Exhibits PAC/1400 and PAC/1402, which are my rebuttal testimony and accompanying exhibit. These Exhibits contain sensitive information regarding PacifiCorp's incentive-based compensation metrics, which, if released publicly, would adversely affect PacifiCorp's ability to offer market-competitive compensation. Exhibit PAC/1400 also includes forecasted capital costs for existing coal generating plants, which, if publicly released, will harm customers by disadvantaging the company as it transacts for goods and services to maintain its coal units.

9. PacifiCorp is asserting a claim of confidentiality with respect to portions of Mr. Chad A. Teply's rebuttal testimony and exhibits. Specifically, Exhibits PAC/1600 and PAC/1603 contain proprietary cost information, which, if publicly released, would adversely affect PacifiCorp's negotiation position regarding future equipment procurement contracts and competitive procurement efforts. Exhibit PAC/1600 also includes forward-looking estimates of coal costs, coal costs, mine reclamation costs, and mine capital costs, which, if released publicly, would adversely affect PacifiCorp's negotiation position regarding future fuel supply agreements. Exhibits PAC/1606 and PAC/1607 contain excerpts from non-public Participation Agreements

between and among PacifiCorp and its co-owners of the Hayden and Craig generating plants, which, if released publicly, will adversely impact the company's negotiation position regarding future joint ownership contracts.

10. PacifiCorp is asserting a claim of confidentiality with respect to portions of Mr. Dana M. Ralston's rebuttal testimony and exhibits. Specifically, Exhibits PAC/1700, Exhibit PAC/1701, Exhibit PAC/1702 and PAC/1703 include forward-looking estimates of coal costs, coal costs, mine reclamation costs, and mine capital costs, which, if released publicly, would adversely affect PacifiCorp's negotiation position regarding future fuel supply agreements.

11. PacifiCorp is asserting a claim of confidentiality with respect to portions of Mr. Rick T. Link's rebuttal testimony. Specifically, Exhibit PAC/1800, includes references to the names of market forecasting services to which PacifiCorp subscribes and are subject to certain confidentiality requirements. Exhibit PAC/1800 also includes forward-looking estimates of coal costs, mine reclamation costs, and mine capital costs, which, if released publicly, would adversely affect PacifiCorp's negotiation position regarding future fuel supply agreements. Exhibit PAC/1800 also includes the results of preliminary and incomplete analysis that relied on forecasted capital, operating costs and performance estimates for existing coal generating plants, which, if publicly released, will harm customers by disadvantaging the company as it transacts for goods and services to maintain its coal units; public disclosure could also adversely impact regional wholesale power markets.

12. PacifiCorp is asserting a claim of confidentiality with respect to portions of Ms. Shelley E. McCoy's exhibit PAC/1902. Specifically, Exhibit PAC/1902 includes labor escalation factors from a third-party vendor subject to confidentiality restrictions.

13. The information for which PacifiCorp seeks confidential treatment is market-sensitive information or subject to contractual commitments, and is entitled to confidential treatment consistent with past Commission decisions.¹


14. Information regarding requests for disclosure of the information for which PacifiCorp seeks confidential treatment should be directed to the following individuals:

California Dockets
PacifiCorp
californiadockets@pacificorp.com

Cathie Allen
PacifiCorp
Regulatory Affairs Manager
cathie.allen@pacificorp.com

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

Executed in Portland, Oregon on November 20, 2018.


Etta Lockey
Vice President, Regulation
PacifiCorp

¹ See, e.g., *Application of Pac. Gas and Elec. Co. for approval of 2010-2011 SmartAC™ Program and Budget*, Application (A.) No. 09-08-018, Decision (D.) No. 11-01-036 at 5 (Jan. 1, 2011).