

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 416**

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY.

7 Request for a General Rate Revision.

STAFF RESPONSE TO SBUA OBJECTION
AND MOTION TO ADMIT STAFF EXHIBIT
413

8 Staff of the Public Utility Commission of Oregon (Staff) submitted a Motion to Admit
9 Pre-filed Exhibits on September 29, 2023, asking the Administrative Law Judge to admit Staff
10 Exhibits 400 through Staff 4200 filed in Docket No. UE 416. On October 4, 2023, the Small
11 Business Utility Advocates (SBUA) filed a response to Staff’s motion, objecting to admission of
12 Staff’s pre-filed exhibits unless all the public comment submitted to the OPUC are included in
13 Staff’s pre-filed exhibits for inclusion in the record.¹

14 Staff agrees it is proper to have a complete record of the public comments submitted to
15 the OPUC and that Staff’s Motion to Admit Pre-filed exhibits inadvertently excluded a pre-filed
16 Staff Exhibit 413 supporting Staff’s Opening Testimony that contains public comments.
17 Staff Exhibit 413 was pre-filed on June 26, 2023. Staff Exhibit 413 consists of 204 pages of
18 public comments, including comments from Danny Kermode (Staff/413, Muldoon/193-197),
19 Mike Devlin (Staff/413, Muldoon/128), and Hector Mejia Zamora (Staff/413, Muldoon/201).

20 Staff asks the ALJ Law Judge to admit pre-filed Exhibit Staff/413 into the record along
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26 ¹ Response of Small Business Utility Advocates to Staff’s Motion to Admit Pre-Filed Testimony,
October 4, 2023.

1 with the other exhibits listed in the Staff Motion to Admit Pre-filed Exhibits filed on September
2 29, 2023.

3 DATED this 5th day of October 2023.

4 Respectfully submitted,

5 ELLEN F. ROSENBLUM

6 Attorney General

7 */s/ Stephanie Andrus*

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Stephanie Andrus, OSB No. 925123
9 Sr. Assistant Attorney General
10 Of Attorneys for Staff of the Public Utility
11 Commission of Oregon
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