

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 399**

In the Matter of  
PACIFICORP, dba PACIFIC POWER  
Request for a General Rate Revision

NEWSUN ENERGY, LLC'S CROSS-  
EXAMINATION STATEMENT

Pursuant to Administrative Law Judge Mapes November 3, 2022 Ruling, NewSun Energy, LLC (NewSun) submits this cross-examination statement for the November 18, 2022 hearing on the Fourth Partial Stipulation filed in this docket on September 30, 2022.

1. NewSun will be represented by Richard Lorenz. Mr. Lorenz's email is [rlorenz@cablehouston.com](mailto:rlorenz@cablehouston.com). Mr. Lorenz will be lead counsel for the hearing.
2. Newsun will also be represented by Marie Barlow. Ms. Barlow's email is [mbarlow@newsunenergy.net](mailto:mbarlow@newsunenergy.net).
3. NewSun's witness, Jake Stephens will also attend the hearing and will be available for cross-examination. Mr. Stephens' email is [jstephens@newsunenergy.net](mailto:jstephens@newsunenergy.net).
4. NewSun intends to cross-examine the following witnesses that sponsored the Joint Testimony in Support of the Fourth Partial Stipulation and Joint Response Testimony in Support of the Fourth Partial Stipulation:
  - a. Matthew McVee, Madison Bolton, Will Gehrke, Alex Kronauer, Bradley Cebulko, and Spencer Gray.
  - b. Because the Joint Testimony and Joint Response Testimony are both sponsored in their entirety by each of the above-referenced witnesses, without specifying whether a specific witness is sponsoring any particular portion of the testimony, NewSun reserves the right to cross-examine each of the witnesses individually about any portion of the Joint Testimony or Joint Response Testimony.
  - c. NewSun estimates that cross-examination will take approximately one (1)

hour and will not include discussion of any confidential information.

- d. The topics for cross-examination may include: The Fourth Partial Stipulation, the proposed Accelerated Commitment Tariff in proposed Schedule 273; the terms and conditions of industry standard wholesale Power Purchase Agreements (PPAs); the terms and conditions of PacifiCorp PPA's; commercially reasonable remedies for the under-delivery of power under any participating PPA's; the process for selecting replacement ACT resources; and other representations made in testimony in support of the Fourth Partial Stipulation.

NewSun also reserves the right to ask follow-up questions of any witness who is cross-examined by another party, the Administrative Law Judge, or any Commissioner.

DATED this 14<sup>th</sup> day of November, 2022.

/s/Richard G. Lorenz  
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*Of Attorneys for NewSun Energy, LLC*