

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 399

In the Matter of

PACIFICORP, d/b/a Pacific Power

Request for a General Rate Revision.

NEWSUN ENERGY, LLC'S MOTION
TO ADMIT PRE-FILED TESTIMONY
AND EXHIBITS OF JAKE STEPHENS
AND CROSS EXAMINATION
EXHIBIT.

NewSun Energy, LLC ("NewSun") respectfully moves for the admission of the following pre-filed testimony and exhibits of Jake Stephens into the record as evidence in this proceeding:

1. NewSun opposition testimony and exhibits of Jake Stephens (NewSun/100-103).
 - a. NewSun/100 – Opposition testimony and exhibits to the Fourth Partial Stipulation.
 - b. NewSun/101 – Sections 21.3 and 22 of the Western Systems Power Pool Master Agreement.
 - c. NewSun/102 – Articles Four and Five of the Edison Electric Institute (EEI) Master Agreement.
 - d. NewSun/103 – Section 6(c) and 6(e) of the International Swap Dealers Association ("ISDA") North American Power Annex.

The above-referenced testimony and exhibits were previously filed with the Commission. The declaration of Jake Stephens attesting to the truthfulness of these exhibits is attached to this motion.

In addition, NewSun moves for the admission of its Cross Examination Exhibit into the record as evidence in this proceeding:

- e. PGE Rate Schedule 55 (Large Nonresidential Green energy Affinity Rider (GEAR) that was filed with the Commission on November 17th, 2022, and referenced in the evidentiary hearing on November 18, 2022.

Dated this 29th day of November, 2022.

CABLE HUSTON LLP

s/ Richard Lorenz

Richard Lorenz, OSB No. 003086

1455 SW Broadway, Suite 1500

Portland, OR 97201

Telephone: (503) 224-3092

E-Mail: rlorenz@cablehuston.com

Of Attorneys for NewSun Energy, LLC

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DECLARATION OF JAKE
STEPHENS

I, Jake Stephens, declare the following:

1. My name is Jake Stephens, CEO and founder of NewSun Energy LLC (“NewSun”). I prepared testimony and exhibits in this proceeding on behalf of the NewSun.
2. I sponsored NewSun opposition testimony and exhibits to the Fourth Partial Stipulation (NewSun/100-103, Stephens).
3. The above referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 29th day of November, 2022.



Jake Stephens