

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 PCN 5

4 In the Matter of
5 IDAHO POWER COMPANY,
6 Petition for Certificate of Public Convenience
7 and Necessity.
8

**STAFF MOTION TO ADMIT PRE-FILED
EXHIBITS**

9 Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law
10 Judge to admit the following pre-filed Staff Exhibits into the record in the above-captioned
11 docket:

12 Exhibit No.	13 Exhibit	14 Filing Date
15 Staff Exhibit 100	16 Opening Testimony of Sudeshna Pal - <i>Confidential</i>	17 01/17/23, 18 corrected 04/17/23
19 Staff Exhibit 101	20 Witness Qualification Statement of Sudeshna Pal	21 01/17/23, with 22 Staff Exhibit 100
23 Staff Exhibit 102	24 Idaho Power Company Data Request Responses	25 01/17/23 with 26 Staff Exhibit 100
Staff Exhibit 103	Idaho Power Company Data Request Responses - <i>Confidential</i>	01/17/23 with Staff Exhibit 100
Staff Exhibit 104	Summary of Public Comments	01/17/23 with Staff Exhibit 100
Staff Exhibit 105	Bonneville Power Administration (BPA) Presentation Slides and Letter to Region	01/17/23 with Staff Exhibit 100

1	Staff Exhibit 106	PacifiCorp 2021 Integrated Resource Plan (IRP),	01/17/23 with
2		Chapter 9 excerpt	Staff Exhibit 100
3	Staff Exhibit 107	Idaho Power 2021 IRP, Appendix D	01/17/23 with
4			Staff Exhibit 100
5	Staff Exhibit 108	Idaho Power Standard Data Request Responses	01/17/23 with
6			Staff Exhibit 100
7	Staff Exhibit 200	Opening Testimony of Yassir Rashid - <i>Confidential</i>	01/17/23
8	Staff Exhibit 201	Witness Qualification Statement of Yassir Rashid	01/17/23 with
9			Staff Exhibit 200
10	Staff Exhibit 202	Idaho Power Company Response to Staff Data	01/17/23 with
11		Request No. 25	Staff Exhibit 200
12	Staff Exhibit 203	Idaho Power Company Response to Staff Data	01/17/23 with
		Request No. 6	Staff Exhibit 200
13	Staff Exhibit 204	Idaho Power Company Response to Staff Data	01/17/23 with
14		Request No. 59 - <i>Confidential</i>	Staff Exhibit 200
15	Staff Exhibit 300	Opening Testimony of Charles Lockwood	01/17/23
16	Staff Exhibit 301	Witness Qualification Statement of Charles	01/17/23 with
17		Lockwood	Staff Exhibit 300
18	Staff Exhibit 302	Idaho Power Company Responses to Staff Data	01/17/23 with
19		Requests	Staff Exhibit 300
20	Staff Exhibit 400	Rebuttal Testimony of Sudeshna Pal - <i>Confidential</i>	03/20/23
21	Staff Exhibit 401	Idaho Power Company Responses to Staff Data	03/20/23 with
22		Requests	Staff Exhibit 400
23	Staff Exhibit 402	Idaho Power Company Responses to Staff Data	03/20/23 with
24		Requests - <i>Confidential</i>	Staff Exhibit 400

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1	Staff Exhibit 403	Public Comment Summary	03/20/23 with
2			Staff Exhibit 400
3	Staff Exhibit 500	Rebuttal Testimony of Yassir Rashid	03/20/23
4	Staff Exhibit 600	Rebuttal Testimony of Charles Lockwood	03/20/23

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6 This Motion to Admit Pre-Filed Staff Exhibits is supported by Declarations of Staff
7 witnesses Sudeshna Pal, Yassir Rashid and Charles Lockwood that attest to the truthfulness of
8 their testimony. The Declarations are attached to this motion.

9 DATED this 25th day of April 2023.

10 Respectfully submitted,

11 ELLEN F. ROSENBLUM
12 Attorney General

13 */s/ Johanna M. Riemenschneider*

14 _____
15 Johanna M. Riemenschneider, OSB #990083
16 Senior Assistant Attorney General
17 Of Attorneys for Staff of the Public Utility
18 Commission of Oregon

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

PCN 5

In the Matter of
IDAHO POWER COMPANY,
Petition for Certificate of Public Convenience
and Necessity.

DECLARATION OF CHARLES LOCKWOOD

I, Charles Lockwood, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Utility Analyst in the Utility Strategy and Integration Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 300 and prepared Staff Exhibits 301 and 302.

3. Also on behalf of Staff, I drafted the pre-filed rebuttal testimony submitted for use in this docket as Staff Exhibit 600.

4. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 24 day of April 2023.

Charles Lockwood

Charles Lockwood

DOCKET PCN 5 - CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2023 **STAFF MOTION TO ADMIT PRE-FILED EXHIBITS** was served by USPS First Class Mail to said person at his last known address as indicated below:

John C. Williams
P.O. Box 1384
La Grande, OR 97850

DATED this 25th day of April 2023.

/s/ Johanna Riemenschneider

Johanna Riemenschneider, OSB #990083
Senior Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission