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

4 PCN 8

5 In the Matter of
6 PACIFICORP, dba PACIFIC POWER
7 Petition for Certificate of Public Convenience
and Necessity.

STAFF’S MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS

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

Exhibit No.	Exhibit	Filing Date
Staff Exhibit 100	Opening Testimony of Eric Shierman	8/11/2025
Staff Exhibit 101	Witness Qualifications Statement of Eric Shierman	8/11/2025, with Staff Exhibit 100
Staff Exhibit 102	PacifiCorp Responses to Staff Data Requests	8/11/2025, with Staff Exhibit 100
Staff Exhibit 103	Public Comments	8/11/2025, with Staff Exhibit 100
Staff Exhibit 200	Opening Testimony of Yassir Rashid	8/11/2025
Staff Exhibit 201	Witness Qualifications Statement of Yassir Rashid	8/11/2025, with Staff Exhibit 200

1	Staff Exhibit 202	PacifiCorp's Responses to	8/11/2025, with Staff Exhibit
2		Select Staff Data Requests	200
3	Staff Exhibit 203	Documents Provided by	8/11/2025, with Staff Exhibit
4		PacifiCorp	200
5	Staff Exhibit 300	Rebuttal Testimony of Eric	10/23/2025
6		Shierman	
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8	Staff Exhibit 301	PacifiCorp's Response to	10/23/2025, with Staff
9		Staff's Data Request	Exhibit 300
10	Staff Exhibit 400	Rebuttal Testimony of Yassir	10/23/2025
11		Rashid	
12	Staff Exhibit 401	Excerpts from PacifiCorp's	10/23/2025, with Staff
13		Electric Service	Exhibit 400
14		Requirements Manual	
15			
16	Staff Exhibit 402	PacifiCorp's Easements: A	10/23/2025, with Staff
17		Guide for Property Owners,	Exhibit 400
18		obtained	
19	Staff Exhibit 403	PacifiCorp's Response to	10/23/2025, with Staff
20		Staff's Data Request	Exhibit 400
21	Staff Exhibit 404	BPA Living and Working	10/23/2025, with Staff
22		Safely Around High-Voltage	Exhibit 400
23		Power Lines	
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1	Staff Exhibit 405	Duke Energy Use Guidelines for Encroachments Involving Transmission Easements	10/23/2025, with Staff Exhibit 400
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4	Staff Exhibit 406	AEP Encroachments on Transmission Rights-of-Way	10/23/2025, with Staff Exhibit 400
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6	Staff Exhibit 407	Excerpt from RUS Design Manual for High Voltage Transmission Lines	10/23/2025, with Staff Exhibit 400
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10	Staff Exhibit 408	PacifiCorp's Response to Staff Data Request	10/23/2025, with Staff Exhibit 400
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12	Stipulation of Parties	Stipulation of Parties	12/8/2025
13	Joint Brief in Support of Stipulation	Joint Brief in Support of Stipulation	12/18/2025
14			
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16 This Motion to Admit Testimony and Exhibits is supported by Declarations of Staff witnesses
17 Eric Shierman and Yassir Rashid that attest to the truthfulness of their testimony. The
18 Declarations are attached to this motion.

19 DATED this 22nd day of December 2025.

20 Respectfully submitted,

21 DAN RAYFIELD
22 Attorney General

23 */s/ Marli Klass*

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25 Marli Klass, OSB No.223244
26 Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon,
State of Oregon

marli.klass@doj.oregon.gov

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9 DECLARATION ERIC SHIERMAN

10 I, Eric Shierman, state the following, under penalty of perjury in the State of Oregon:

- 11 1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I am a
12 Senior Utility Analyst in the Energy Resources and Planning Division of the Public
13 Utility Commission of Oregon.
14 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this
15 docket as Staff Exhibit 100 and prepared Staff Exhibits 101 through 103.
16 3. Also on behalf of Staff, I drafted the pre-filed rebuttal testimony submitted for use in
17 this docket as Staff Exhibit 300 and prepared Staff Exhibit 301.
18 4. To the best of my knowledge, my pre-filed testimony is true and accurate. I hereby
19 declare that the above statement is true to the best of my knowledge and belief, and
20 that I understand it is made for use as evidence in this proceeding and is subject to
21 penalty for perjury.

22 Some of the exhibits I submitted are documents written by other individuals. These documents
23 are true and correct versions of the documents that I retrieved from the following sources:

- 24 • Exhibit Staff/102 – PacifiCorp’s Responses to Staff Data Requests obtained from
25 Huddle.
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- Exhibit Staff/103 –Public Comments obtained from eDockets PCN 8 and on file with Oregon Public Utility Commission, including transcript from 7/9/2025 Public Hearing.
- Exhibit Staff/301–PacifiCorp’s Response to Staff’s Data Requests obtained from Huddle

SIGNED this 22nd day of December 2025.

/s/ Eric Shierman

Eric Shierman

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9 DECLARATION OF YASSIR RASHID

10 I, Yassir Rashid, state the following, under penalty of perjury in the State of Oregon:

- 11 1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I am an
12 Electrical Engineer and Senior Utility Analyst employed in the Safety, Reliability,
13 and Security Division of the Public Utility Commission of Oregon.
14 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this
15 docket as Staff Exhibit 200 and prepared Staff Exhibits 201 through 203.
16 3. Also, on behalf of Staff, I drafted the pre-filed rebuttal testimony submitted for use in
17 this docket as Staff Exhibit 400 and prepared Staff Exhibits 401 through 408.
18 4. To the best of my knowledge, my pre-filed testimony is true and accurate. I hereby
19 declare that the above statement is true to the best of my knowledge and belief, and
20 that I understand it is made for use as evidence in this proceeding and is subject to
21 penalty for perjury.

22 Some of the exhibits I submitted are documents written by other individuals. These documents
23 are true and correct versions of the documents that I retrieved from the following sources:

- 24 • Exhibit Staff/202 – PacifiCorp’s Responses to Staff Data Requests, obtained from
25 Huddle
26 • Exhibit Staff/203 – Documents Provided by PacifiCorp to James Webb, obtained
from James Webb and Lynn Ogden.

- 1 • Exhibit Staff/401 – Excerpts from PacifiCorp’s Electric Service Requirements
2 Manual, obtained from PacifiCorp’s website.
- 3 • Exhibit Staff/ 402 – PacifiCorp’s Easements: A Guide for Property Owners,
4 obtained from PacifiCorp’s website.
- 5 • Exhibit Staff/403 – PacifiCorp’s Response to Staff’s Data Request, obtained from
6 Huddle
- 7 • Exhibit Staff/404– BPA Living and Working Safely Around High-Voltage Power
8 Lines, obtained from Bonneville Power Administration’s website.
- 9 • Exhibit Staff/405 – Duke Energy Use Guidelines for Encroachments Involving
10 Transmission Easements, obtained from Duke Energy’s website.
- 11 • Exhibit Staff/406 – AEP Encroachments on Transmission Rights-of-Way,
12 obtained from American Electric Power’s website.
- 13 • Exhibit Staff/407– Excerpt from RUS Design Manual for High Voltage
14 Transmission Lines, obtained from US Department of Agriculture’s website.
- 15 • Exhibit Staff/408 – PacifiCorp’s Response to Staff Data Request, obtained from
16 Huddle.

17 SIGNED this 22nd day of December 2025.

18 */s/ Yassir Rashid*

19 _____
20 Yassir Rashid