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Portland, OR 97201

October 30, 2018

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
Request for a General Rate Revision
Docket No. UE 335

Dear Filing Center:

Please find enclosed the Motion to Admit Pre-filed Testimony and Exhibits on behalf of the Alliance of Western Energy Consumers.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 335

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision.

MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS OF THE
ALLIANCE OF WESTERN ENERGY
CONSUMERS

Pursuant to OAR 860-001-0420, the Alliance of Western Energy Consumers (“AWEC”) moves for admission into the record of this proceeding the following pre-filed testimony and exhibits, submitted on behalf of AWEC:

Testimony & Exhibits	Description
Confidential AWEC/100	Confidential Opening Power Cost Testimony of Bradley G. Mullins
AWEC/101	Qualification Statement of Bradley G. Mullins
Confidential AWEC/102	Historical Forward Price Curve Forecast Error Analysis 2005-2016
AWEC/103	Company Response to AWEC Data Request No. 112
Confidential AWEC/200	Confidential Opening Rate Case Testimony of Bradley G. Mullins
AWEC/201	Revenue Requirement Calculations
AWEC/202	Impact of Tax Cuts and Jobs Act on Filing
AWEC/203	Interim Period Deferral
AWEC/204	Notice of Internal Use Software Regulations

PAGE 1 – AWEC MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS

DAVISON VAN CLEVE, P.C.
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AWEC/205	Responses to Data Requests
Confidential AWEC/206	Confidential Attachments to Data Responses
AWEC/300	Opening Rate Case Testimony of Dr. Marc M. Hellman
AWEC/301	Qualification Statement of Dr. Marc M. Hellman
Confidential AWEC/302	Budget Manual Instructions for 2016 and 2017
AWEC/303	OLS Output Results for Comparable Company Analysis
Confidential AWEC/304	PGE Benefits Ranking
Confidential AWEC/305	PGE Incentive Program Examples
AWEC/306	Average to Budget Incentives Percentage Payout
AWEC/307	PGE Responses to Data Requests
AWEC/308	Central Lincoln People's Utility Dist. v. Oregon Dept. of Energy, Marion County Cir. Ct., Case No. 16CV18269 (Aug. 9, 2017)
AWEC/309	Excerpt of ODOE ESA PowerPoint
AWEC/400	Rebuttal Testimony of Bradley G. Mullins
AWEC/500	Direct Access Testimony of Bradley G. Mullins
AWEC/501	Illustration of Value of Freed-Up Capacity in the Transition Period
AWEC/502	PGE Response to AWEC Data Request No. 154
AWEC/503	PGE Handout in AR 441 Workshop
AWEC/504	PGE Comments and Staff Report in Advice No. 02-17

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AWEC/505	PGE Response to Staff Data Request 324
Confidential AWEC/506	PGE Response to AWEC Data Requests Nos. 148 and 151
AWEC/507	PGE Response to AWEC Data Request No. 153
Stipulating Parties/100	Joint Testimony in Support of Partial Stipulation
Stipulating Parties/200	Joint Testimony in Support of Net Variable Power Cost Stipulation
Stipulating Parties/300	Joint Testimony in Support of Second Partial Stipulation
Stipulating Parties/400	Joint Testimony in Support of the Third Partial Stipulation
Cross-Exam Exhibits	Description
AWEC/600	CUB Response to AWEC Data Request 002 and attachments
AWEC/601	Excerpt from PGE 2016 IRP showing forecasted capacity need
Confidential AWEC/602	PGE response to AWEC Data Request No. 155 and Confidential Attachment A
AWEC/603	PGE response to AWEC Data Request No. 156
AWEC/604	PGE response to AWEC Data Request No. 158
AWEC/605	PGE response to AWEC Data Request No. 157 and Attachment A
AWEC/606	PGE response to AWEC Data Request No. 160
AWEC 607	Table 1 from Page 11 of AWEC/500 with alternative assumptions

The Affidavits of Bradley G. Mullins and Dr. Marc M. Hellman attesting to the truth and accuracy of the foregoing testimony and exhibit filings, as well as testimony offered in support of the stipulations identified above, are attached.

Dated this 30th day of October, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 335

In the Matter of

PORTLAND GENERAL ELECTRIC,

Request for a General Rate Revision.

AFFIDAVIT OF
BRADLEY G. MULLINS

I, BRADLEY G. MULLINS, being first duly sworn on oath, depose and say:

1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers ("AWEC") in this matter.

2. I sponsored testimony and exhibit filings (AWEC/100-103; AWEC/200-206; AWEC/400; AWEC/500-507; Stipulating Parties/200; Stipulating Parties/300; and Stipulating Parties/400) on behalf of AWEC and the Stipulating Parties in this matter.

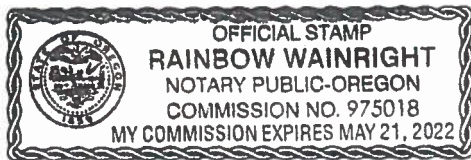
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

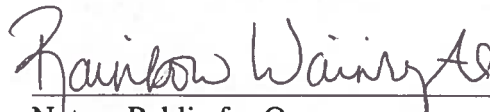
SIGNED this 29 day of October, 2018.



BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 29 day of October, 2018.





Notary Public for Oregon

My Commission Expires: May 21, 2022

state of Oregon
county of Multnomah

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 335

In the Matter of

PORTLAND GENERAL ELECTRIC,

Request for a General Rate Revision.

AFFIDAVIT OF
DR. MARC M. HELLMAN

I, DR. MARC M. HELLMAN, being first duly sworn on oath, depose and say:

1. My name is Marc M. Hellman. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers ("AWEC") in this matter.

2. I sponsored testimony and exhibit filings (AWEC/300-309; Stipulating Parties/100; and Stipulating Parties/400) on behalf of AWEC and the Stipulating Parties in this matter.

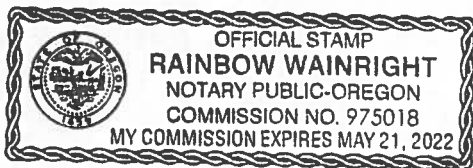
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

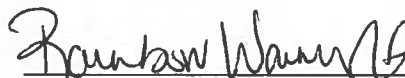
SIGNED this 30 day of October, 2018.



DR. MARC M. HELLMAN

SUBSCRIBED AND SWORN to before me this 30 day of October, 2018.




Notary Public for Oregon
My Commission Expires: May 21, 2022
State of Oregon
County of Multnomah