1 BEFORE THE PUBLIC UTILITY COMMISSION **OF OREGON** 2 **UE 335** 3 4 In the Matter of STAFF MOTION TO ADMIT EXHIBITS 5 PORTLAND GENERAL ELECTRIC COMPANY, 6 Request for a General Rate Revision. 8 9 Staff of the Public Utility Commission of Oregon ("Staff") moves to admit the following 10 exhibits into the record in the above-captioned case: 11 12 Exhibit 100 Testimony of Scott Gibbens – NVPC 13 Witness Qualification Statement of Scott Gibbens Exhibit 101 14 Exhibit 200 Testimony of Rose Anderson – NVPC 15 Exhibit 201 Witness Qualification Statement of Rose Anderson 16 Exhibit 202 Excerpt of PGE's Schedule 201 Standard Contract 17 Exhibit 300 Testimony of Lance Kaufman – NVPC (Confidential) 18 Exhibit 301 Witness Qualification Statement of Lance Kaufman 19 Exhibit 302 Non confidential DR Responses 20 Exhibit 303 Confidential DR Responses (Confidential) 21 Exhibit 304 DOE Carty Site Report 22

Page 1 - STAFF MOTION TO ADMIT EXHIBITS SSA/ssa/9254489

Columbia River Keeper Report

BPA Klondike Record of Decision

Testimony of Marianne Gardner

EnerG Magazine Report of PGE Wind Facility

Witness Qualification Statement of Marianne Gardner

Exhibit 305

Exhibit 306

Exhibit 307

Exhibit 400

Exhibit 401

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	<u>, </u>	
1	Exhibit 402	PGE Responses to Staff Data Requests
2	Exhibit 403	Escalation – Excerpts from Consumers Price Index – All Urban Consumers for the U.S. published by OEA (released February 16, 2018)
3	Exhibit 404	Staff Outstanding Data Requests to PGE
4	Exhibit 500	Testimony of John Fox (Confidential)
5	Exhibit 501	Witness Qualification Statement of John Fox
6	Exhibit 502	Effective Tax Rates
7,	Exhibit 503	Data Request Responses
8	Exhibit 600	Testimony of Jeffrey Watson
9	Exhibit 601	Witness Qualification Statement of Jeffery Watson
10	Exhibit 602	Company's Responses to Staff DR Nos. 161, 162, and 171-174
11	Exhibit 603	Company's confidential response to Staff DR No. 287 (Confidential)
12	Exhibit 604	Summary of Staff's Proposed Adjustments
13	Exhibit 700	Testimony of Mitchell Moore
14	Exhibit 701	Witness Qualification Statement of Mitchell Moore
15 16	Exhibit 702	Workpaper – Financial Impact of 2017 Storm Damages
	Exhibit 800	Testimony of Lance Kaufman (Confidential)
17	Exhibit 801	Non-confidential Data Responses
18	Exhibit 802	Confidential Data Responses (Confidential)
19	Exhibit 803	Other Revenue
20	Exhibit 804	Weather Risk Statistical Test
21	Exhibit 805	Confidential PGE Plant Forecast (Confidential)
22	Exhibit 806	Excerpt from PGE Advice 02-17
23	Exhibit 900	Testimony of George Compton
24	Exhibit 901	Witness Qualification Statement of George Compton
25	Exhibit 902	Effects of relaxing Company's Generation Reserve margin assumption
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Page 2 - STAFF MOTION TO ADMIT EXHIBITS SSA/ssa/9254489

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1	Exhibit 1000	Testimony of Scott Gibbens	
2	Exhibit 1001	Witness Qualification Statement	
3	Exhibit 1002	Company's Response to Staff DR No. 238	
4	Exhibit 1100	Rebuttal Testimony of Lance Kaufman – NVPC	
5	Exhibit 1200	Rebuttal Testimony of Scott Gibbens – NVPC	
6	The truthfulness of the testimony and witness qualification statements of Staff witnesses		

The truthfulness of the testimony and witness qualification statements of Staff witnesses is declared by Staff in declarations attached to this motion. Lance Kaufman is no longer working for the Agency and his testimony is adopted by Scott Gibbens and its truthfulness demonstrated by the declaration of Scott Gibbens.

DATED this day of October 2018.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

Stephanie S. Andrus, #92512
Senior Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon

Page 3 - STAFF MOTION TO ADMIT EXHIBITS SSA/ssa/9254489

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 **UE 335** 3 In the Matter of 4 PORTLAND GENERAL ELECTRIC CO. DECLARATION OF 5 MARIANNE GARDNER Request for a General Rate Revision 6 7 8 I, Marianne Gardner, state the following, under penalty of perjury in the State of Oregon: 9 1. I am the Program Manager for Rate Cases and Audits employed in the Energy 10 Rates, Finance and Audit Division of the Public Utility Commission of Oregon. 11 2. On behalf of Staff of the Public Utility Commission, I drafted testimony for the 12 above-captioned docket pre-filed as Staff Exhibit 400 and corrected by an errata filed on June 15, 13 2018, and drafted my witness qualification statement, pre-filed as Staff Exhibit 401. 14 3. On behalf of Stipulating Parties, I co-drafted Joint Testimony in support of Partial 15 Stipulation, Second Partial Stipulation, and Third Partial Stipulation pre-filed as Stipulating Parties 16 Exhibits 100, 300, and 400. 17 To the best of my knowledge, my pre-filed testimony and witness qualification 18 statement are true and accurate. 19 20 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 21 penalty for perjury. 22 23 SIGNED this / day of October 2018. 24 25 26

Page 1 - UE 335 - DECLARATION OF MARIANNE GARDNER

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2	UE 335			
3				
4	In the Matter of)			
5	PORTLAND GENERAL ELECTRIC CO.) DECLARATION OF MITCHELL MOORE			
6 7	Request for a General Rate Revision.			
8	I, Mitchell Moore, state the following, under penalty of perjury in the State of Oregon:			
9	1. I am a Senior Utility Analyst in the Energy Rates, Finance and Audit Division of			
10	the Public Utility Commission of Oregon.			
11	2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony			
12	for the above-captioned docket pre-filed as Staff Exhibit 700, and my witness qualification			
13	statement, pre-filed as Staff Exhibit 701.			
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification			
15	statement are true and accurate.			
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17	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			
18	penalty for perjury.			
19				
20	SIGNED this 15 day of October 2018.			
21	14th			
22	Tales of La			
23	MITCHELL MOORE			
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Page 1 - UE 335 - DECLARATION OF MITCHELL MOORE

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 **UE 335** 3 In the Matter of 4 PORTLAND GENERAL ELECTRIC CO. DECLARATION OF 5 GEORGE COMPTON Request for a General Rate Revision 6 7 8 I, George Compton, state the following, under penalty of perjury in the State of Oregon: 1. I am a Senior Economist (part-time) employed by the Public Utility Commission 10 of Oregon. 11 2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony 12 for the above-captioned docket pre-filed as Staff Exhibit 900, and my witness qualification 13 statement, pre-filed as Staff Exhibit 901. 14 To the best of my knowledge, my pre-filed testimony and witness qualification 15 statement are true and accurate. 16 17 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 18 penalty for perjury. 19 SIGNED this $\frac{\cancel{8} th}{\text{day of October 2018}}$. 20 21 22 23 24 25 26

Page 1 - UE 335 - DECLARATION OF GEORGE COMPTON

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2	UE 335			
3	In the Matter of			
5	PORTLAND GENERAL ELECTRIC CO.) DECLARATION OF SCOTT GIBBENS			
6 7	Request for a General Rate Revision)			
8	I, Scott Gibbens, state the following, under penalty of perjury in the State of Oregon:			
9	1. I am a Senior Economist employed in the Energy Rates, Finance and Audit			
10	Division of the Public Utility Commission of Oregon.			
11	2. On behalf of Staff of the Public Utility Commission, I drafted testimony for the			
12	above-captioned docket pre-filed as Staff Exhibits 100, 1000, and 1200, and my witness			
13	qualification statement, pre-filed as Staff Exhibit 101.			
14	3. On behalf of Staff, I co-drafted Joint Testimony in support of net Variable Power			
15	Cost Stipulation and Testimony in Support of Stipulation pre-filed as Stipulating Parties Exhibit			
16	200 and 600, the latter corrected by errata on September 28, 2018.			
17	4. On behalf of the Staff, I adopt the testimony of former Staff employee Lance			
18	Kaufman pre-filed as Staff Exhibits 300, 800, and 1100, and adopt his co-written Joint			
19	Testimony in Support of Direct Access Partial Stipulation pre-filed as Stipulating Parties Exhibit			
20	500.			
21	To the best of my knowledge, my pre-filed testimony, including adopted testimony, and			
22	witness qualification statement are true and accurate.			
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Page 1 - UE 335 - DECLARATION OF SCOTT GIBBENS

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2	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
3	penalty for perjury.
4	SIGNED this 15th day of October 2018.
5	SIGNED this 2 day of October 2018.
6	SCOTT GIBBENS
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Page 2 - UE 335 - DECLARATION OF SCOTT GIBBENS

	IC UTILITY COMMISSION OREGON		
UE 335			
In the Matter of			
PORTLAND GENERAL ELECTIC CO.) DECLARATION OF		
Request for a General Rate Revision) JOHN FOX))		
of the Public Utility Commission of Oregon. 2. On behalf of Staff of the Public for the above-captioned docket pre-filed as statement, pre-filed as Staff Exhibit 501.	of perjury in the State of Oregon: st, in the Energy Rates, Finance and Audit Division ic Utility Commission, I drafted opening testimony Staff Exhibit 500, and my witness qualification , my pre-filed testimony and witness qualification		
•	nt is true to the best of my knowledge and for use as evidence in court and is subject to 18. John Fox		

Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 947-4520 / Fax: (503) 378-3784

Page 1 - UE 335 - DECLARATION OF JOHN FOX

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON						
2	UE 335					
3	In the Matter of					
5	PORTLAND GENERAL ELECTRIC CO.) DECLARATION OF JEFFREY WATSON					
6	Request for a General Rate Revision)					
7 8 9 10 11 12 13 14 15 16	I, Jeffrey Watson, state the following, under penalty of perjury in the State of Oregon: 1. I am a Consumer Services Analyst employed by the Public Utility Commission of Oregon. 2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for the above-captioned docket pre-filed as Staff Exhibit 600, and my witness qualification statement, pre-filed as Staff Exhibit 601. 3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.					
171819	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 benalty for perjury.					
20	SIGNED this $\frac{15}{15}$ day of October 2018.					
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22	JEFFREY WATSON					
2324						
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Page 1 - UE 335 - DECLARATION OF JEFFREY WATSON

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2. **UE 335** In the Matter of 4 PORTLAND GENERAL ELECTRIC CO. **DECLARATION OF** 5 ROSE ANDERSON Request for a General Rate Revision. 7 I. Rose Anderson, state the following, under penalty of perjury in the State of Oregon: 8 I am a Senior Utility Analyst in the Energy Resources and Planning Division of 1. 9 the Public Utility Commission of Oregon. 10 On behalf of Staff of the Public Utility Commission, I drafted opening testimony 2. 11 for the above-captioned docket pre-filed as Staff Exhibit 200, and my witness qualification 12 statement, pre-filed as Staff Exhibit 201. 13 To the best of my knowledge, my pre-filed testimony and witness qualification 14 statement are true and accurate. 15 16 I hereby declare that the above statement is true to the best of my knowledge and 17 belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury. 18 19 SIGNED this \ day of October 2018. 20 21 22. 23 24 25 26

Page 1 - UE 335 - DECLARATION OF ROSE ANDERSON