

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
Suite 450  
1750 SW Harbor Way  
Portland, OR 97201

September 13, 2019

## *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 COMPANY,  
2020 Annual Power Cost Update Tariff  
**Docket No. UE 359**

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Motion to Admit Pre-filed Testimony and Exhibits in the above-referenced docket.

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

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 359**

In the Matter of  PORTLAND GENERAL ELECTRIC COMPANY,  2020 Annual Power Cost Update Tariff (Schedule 125).	) ) ) ) ) ) )	MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS OF THE ALLIANCE OF WESTERN ENERGY CONSUMERS
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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.

<u>Exhibit</u>	<u>Description</u>
Confidential AWEC/100	Confidential Opening Testimony of Bradley G. Mullins
AWEC/101	Qualification Statement of Bradley G. Mullins
Confidential AWEC/102	PGE Gas Optimization Illustration and Quantification
AWEC/103	PGE Response to AWEC DR 112 in Docket No. UE 335
Confidential AWEC/200	Confidential Opening Testimony of Lance D. Kaufman
AWEC/201	Qualification Statement of Lance D. Kaufman

<u>Exhibit</u>	<u>Description</u>
AWEC/202	Illustration from UE 319 Staff Testimony
AWEC/203	Company Responses to Data Requests

The Affidavits of Bradley G. Mullins and Lance D. Kaufman attesting to the truth and accuracy of their testimony and exhibit filings, as well as Mr. Kaufman’s testimony in support of the stipulation filed in this proceeding, are attached.

Dated this 13th day of September, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 359**

In the Matter of ) AFFIDAVIT OF BRADLEY G. MULLINS  
)  
PORTLAND GENERAL ELECTRIC )  
COMPANY, )  
)  
2020 Annual Power Cost Update Tariff )  
(Schedule 125). )

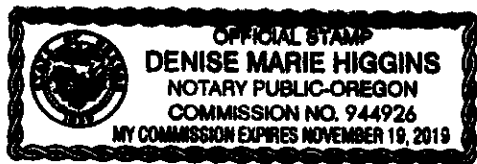
I, BRADLEY G. MULLINS, being first duly sworn on oath, depose and say:


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) on behalf of AWEC 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 19 day of August, 2019.

  
\_\_\_\_\_  
BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 19 day of August, 2019.



  
\_\_\_\_\_  
Notary Public for Oregon  
My Commission Expires: NOV 19 2019

