

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER,)	OREGON CITIZENS' UTILITY
)	BOARD'S MOTION TO ADMIT PRE-
Request for a General Rate Revision.)	FILED TESTIMONY AND EXHIBITS
_____)	

Pursuant to OAR 860-001-0420 and Administrative Law Judge Lackey's September 14, 2020 Memorandum, the Oregon Citizens' Utility Board ("CUB") moves for admission of the following pre-filed testimony and exhibits into the record in the above-captioned proceeding:

1. CUB's Opening Testimony and Exhibits of Bob Jenks (CUB/100-105, Jenks)
 - CUB/100 – Opening Testimony of Bob Jenks
 - CUB/101 – Witness Qualification Statement of Bob Jenks
 - CUB/102 – State of Oregon Department of Environmental Quality – Fact Sheet – Regional Haze: Four Factor Analysis, Regional Haze Planning, and Overview of Regional Haze
 - CUB/103 – PacifiCorp Response to Sierra Club Data Request 1.1
 - CUB/104 – Oregon Office of Economic Analysis – June 2020 Economic and Revenue Forecast
 - CUB/105 – Confidential – PacifiCorp Response to OPUC Data Request 558
2. CUB's Opening Testimony and Exhibits of Sudeshna Pal and William Gehrke (CUB/200-214, Pal-Gehrke)
 - CUB/200 – Opening Testimony of Sudeshna Pal and William Gehrke
 - CUB/201 – Witness Qualification Statement of Sudeshna Pal
 - CUB/202 – Witness Qualification Statement of Will Gehrke
 - CUB/203 – Declining Gas Prices at Henry HUB
 - CUB/204 – Fuel Heating Cost Comparison (Oregon)
 - CUB/205 – Fuel Price of Electric Vehicle versus Gas Vehicle
 - CUB/206 – Pacific Power Monthly Billing Comparison – Single Family
 - CUB/207 – Pacific Power Monthly Billing Comparison – Multi-Family
 - CUB/208 – Residential Customer Charge Six State Comparison
 - CUB/209 – Residential Customer Charge Survey (Pacific Northwest)
 - CUB/210 – Copy of Pacific Power Residential Bill
 - CUB/211 – Residential TOU Pilot Justification

- CUB/212 – CUB Proposed Residential TOU Pilot Program
 - CUB/213 – Residential Hourly Energy Use (kWh) During On-Peak Hours
 - CUB/214 – UM 1708 Cadmus Evaluation of PGE’s Residential Pricing Pilot
3. CUB’s Rebuttal and Cross-Answering Testimony on Coal Decommissioning Costs and Independent Evaluator Report of Bob Jenks (CUB/300, Jenks)
 4. CUB’s Rebuttal and Cross-Answering Testimony of Bob Jenks (CUB/400-410, Jenks)
 - CUB/400 – Rebuttal and Cross-Answering Testimony of Bob Jenks
 - CUB/401 – Moody’s Investor Service – *Puget Sound Energy’s rate case outcome is credit negative*
 - CUB/402 – Attachment to PacifiCorp Response to CUB Data Request 10
 - CUB/403 – Confidential – Attachment to PacifiCorp Response to CUB Data Request 13
 - CUB/404 – Confidential – Excerpt of CUB’s Opening Comments in LC 57
 - CUB/405 – PacifiCorp Response to CUB Data Request 12
 - CUB/406 – Confidential – CUB Calculation of Jim Bridger Units 3 and 4 Rate Base
 - CUB/407 – Confidential – Attachment to PacifiCorp Response to OPUC Data Request 750
 - CUB/408 – Confidential – PacifiCorp 1st Revised Confidential Response to CUB Data Request 4
 - CUB/409 – Confidential – PacifiCorp 1st Revised Confidential Response to CUB Data Request 5
 - CUB/410 – Confidential – Attachment to PacifiCorp Response to CUB Data Request 16
 5. CUB’s Cross-Examination and Additional Exhibits (CUB/500-508)
 - CUB/500 - *Alternative Regulatory Methods and Firm Efficiency: Stochastic Frontier Evidence from the U.S. Electricity Industry* – Dr. Christopher Knittel, MIT.
 - CUB/501 – PacifiCorp Response to CUB Data Request 18
 - CUB/502 – PacifiCorp Response to CUB Data Request 19
 - CUB/503 – Redacted Direct Testimony of Chad A. Teply in California General Rate Case Proceeding, Filed April 2018
 - CUB/504 – Redacted Rebuttal Testimony of Chad A. Teply in California General Rate Case Proceeding, Filed November 2018
 - CUB/505 – Redacted Direct Testimony of Rick T. Link in Wyoming CPCN Proceeding, Filed August 2012
 - CUB/506 – Redacted Direct Testimony of Rick T. Link in California General Rate Case Proceeding, Filed April 2018
 - CUB/507 – Redacted Rebutall Testimony of Rick T. Link in California General Rate Case Proceeding, Filed November 2018
 - CUB/508 - Federal Register, Vol. 78, No. 111, Monday, June 10, 2013. Part III.

The above-referenced testimony and exhibits were previously filed with the Commission and represent CUB’s contribution to the record in this docket. Declarations attesting to the

truthfulness of witness testimony are attached herewith.

Dated this 17th Day of September, 2020.

Respectfully Submitted,



Michael P. Goetz, OSB #141465
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 374**

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER,) DECLARATION OF ROBERT (BOB)
) JENKS
Request for a General Rate Revision.)
_____)

I, Robert (Bob) Jenks, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Robert (Bob) Jenks. I am the Executive Director of the Citizens' Utility Board of Oregon (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205.
2. I sponsored CUB's Opening Testimony and Exhibits of Bob Jenks (CUB/100-105);
3. I sponsored CUB's Rebuttal and Cross-Answering Testimony on Coal Decommissioning Costs and Independent Evaluator Report (CUB/300);
4. I sponsored CUB's Rebuttal and Cross-Answering Testimony (CUB/400-410);
5. My testimony and exhibits that were previously filed are true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

Signed this 17th day of September 2019.

Signed: _____



Bob Jenks
Executive Director
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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 374

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER,) DECLARATION OF
) SUDESHNA PAL
Request for a General Rate Revision.)
_____)

I, Sudeshna Pal declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Sudeshna Pal. I am an Economist for the Oregon Citizens’ Utility Board of Oregon (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205.
2. On behalf of CUB, I co-sponsored the pre-filed Opening Testimony and Exhibits of Sudeshna Pal and William Gehrke (CUB 200-214).
3. My testimony and exhibits previously filed are true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

Signed this 17th day of September 2020.



Sudeshna Pal, Economist
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER,)	DECLARATION OF
)	WILLIAM GEHRKE
Request for a General Rate Revision.)	
_____)	

I, William Gehrke declare under penalty of perjury under the laws of the State of Oregon:

1. My name is William Gehrke. I am an Economist for the Oregon Citizens' Utility Board of Oregon (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205.
2. On behalf of CUB, I co-sponsored the pre-filed Opening Testimony and Exhibits of Sudeshna Pal and William Gehrke (CUB 200-214).
3. My Testimony and Exhibits previously filed are true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

Signed this 17th day of September 2020.



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