

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

3 UE 374

4 In the Matter of  
5 PACIFICORP, dba PACIFIC POWER,  
6 Request for a General Rate Revision.  
7

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

8 Staff of the Public Utility Commission of Oregon (Staff) moves for admission of the  
9 following pre-filed testimony, exhibits and cross-examination exhibits into the record in the  
10 above-captioned docket:  
11

| 12 <b>Staff Opening Testimony</b> |                               |
|-----------------------------------|-------------------------------|
| 13 Staff/100-102                  | John Fox                      |
| 14 Staff/200-210                  | Matt Muldoon and Moya Enright |
| 15 Staff/300-313                  | Brian Fjeldheim               |
| 16 Staff/400-403                  | Heather Cohen                 |
| 17 Staff/500-501                  | Russell Beitzel               |
| 18 Staff/600-603                  | Mitchell Moore                |
| 19 Staff/700-703                  | Sabrina Soldavini             |
| 20 Staff/800-803                  | Steve Storm                   |
| 21 Staff/900-902                  | Ming Peng                     |
| 22 Staff/1000-1003                | John Fox                      |
| 23 Staff/1100-1103                | Max St. Brown                 |
| 24 Staff/1200-1203                | Paul Rossow                   |

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|---|-----------------|---|
| 1 | Staff/1300-1301 | Scott Gibbens                                 |
| 2 | Staff/1400-1408 | Yassir Rashid, Matt Muldoon and Nadine Hanhan |
| 3 | Staff/1500-1501 | Rose Anderson                                 |
| 4 | Staff/1600-1603 | Kathy Zarate                                  |

|   |   |             |
|---|---|-------------|
| 6 | <b>Staff Rebuttal &amp; Cross-Answering on Coal Decommissioning</b> |             |
| 7 | Staff/1700-1706   | Steve Storm |

|    |                                 |   |
|----|---------------------------------|---|
| 9  | <b>Staff Rebuttal Testimony</b> |   |
| 10 | Staff/1800-1802                 | John Fox                                      |
| 11 | Staff/1900-1912                 | Matt Muldoon, Moya Enright, Curtis Dlouhy     |
| 12 | Staff/2000-2002                 | Steve Storm                                   |
| 13 | Staff/2100-2108                 | Nadine Hanhan, Yassir Rashid and Matt Muldoon |
| 14 | Staff/2200                      | Rose Anderson                                 |
| 15 | Staff/2300-2303                 | Sabrina Soldavini                             |
| 16 | Staff/2400-2403                 | Scott Gibbens                                 |
| 17 | Staff/2500-2502                 | Heather Cohen                                 |
| 18 | Staff/2600-2602                 | Brian Fjeldheim                               |
| 19 | Staff/2700-2704                 | Mitch Moore                                   |
| 20 | Staff/2800                      | Paul Rossow                                   |
| 21 | Staff/2900-2901                 | Max St. Brown                                 |
| 22 | Staff/3000-3001                 | Russell Beitzel                               |

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| 1  | <b>Staff Cross-Examination Exhibits</b> |  |
| 2  | Staff/3300                              | PacifiCorp's Response to Staff DRs 92        |
| 3  |   | (attachment), 126 (attachment), 272, 769,    |
| 4  |   | 770, 771 (CONF), 772 (CONF), 773 (with       |
| 5  |   | attachment), 774, 775 and 776. Attachments   |
| 6  |   | to PacifiCorp's responses to 123, 178, 242   |
| 7  |   | and 696.                                     |
| 8  | Staff/3400                              | PacifiCorp's Response to Staff DRs 311, 312  |
| 9  |   | (1st Supplemental response), 313 (1st        |
| 10 |   | Supplemental Response), 725, 726, 727        |
| 11 |   | (CONF), 730, 794, 796, 797, 799, 800, 801,   |
| 12 |   | 803, 804, 807, 809, 811, 819 and 824;        |
| 13 |   | PacifiCorp's Response to AWEC 057            |
| 14 |   | (attachments only)                           |
| 15 | Staff/3500                              | PacifiCorp's Response to Staff DRs 530, 471, |
| 16 |   | 499 (CONF), 826, 827, 828, 830 (CONF) and    |
| 17 |   | 831  |
| 18 | Staff/3600                              | PacifiCorp's Response to Staff DR 793        |
| 19 | Staff/3700                              | PacifiCorp's Response to Staff DRs 515, 761, |
| 20 |   | 762, and 792 (with attachment)               |

21 This motion is supported by the declarations of Staff witnesses Matt Muldoon, Brian  
22 Fjeldheim, Heather Cohen, Russell Beitzel, Ming Peng, Steve Storm, John Fox, Max St. Brown,  
23 Paul Rossow, Nadine Hanhan, Rose Anderson, Kathy Zarate, Moya Enright, Scott Gibbens,  
24 Sabrina Soldavini, Yassir Rashid and Curtis Dlouhy that attest to the truthfulness of their  
25 testimony. The declarations are attached to this motion. Due to extenuating circumstances, Staff  
26 witness Mitch Moore was not available to sign a declaration as of the date of this filing. Staff

1 will file a declaration for Mr. Moore as soon as he is available, which is anticipated to be the  
2 week of September 21, 2020.

3

4 DATED this 17<sup>th</sup> day of September, 2020.

5

Respectfully submitted,

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ELLEN F. ROSENBLUM  
Attorney General

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*/s/ Sommer Moser*

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Sommer Moser, OSB # 105260  
Assistant Attorney General  
Of Attorneys for Staff of the Public Utility  
Commission of Oregon

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DECLARATION OF  
MATT MULDOON

7  
8 I, Matthew J. (Matt) Muldoon, declare under penalty of perjury under the laws of the State  
9 of Oregon:

10 1. My name is Matt Muldoon. I am Manager of Economic Analysis for the Public  
11 Utility Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

12 2. On behalf of Staff, I co-drafted pre-filed testimony and exhibits submitted for use in  
13 this docket as follows: Staff/200, Staff/201 (Witness Qualification Statement), Supporting Exhibits  
14 Staff/203-210 & Staff 1400, Supporting Exhibits 1403-1408 (Reply Testimony); and Staff/1900,  
15 Supporting Exhibits Staff/1902-1912; & Staff/2100, Supporting Exhibits 2102-2108 (Rebuttal  
16 Testimony).

17 3. To the best of my knowledge, my pre-filed testimony and my witness qualification  
18 statement are true and accurate.

19 I hereby declare that the above statements are true to the best of my knowledge and belief,  
20 and that I understand it is made for use as evidence before the Public Utility Commission of  
21 Oregon and is subject to penalty for perjury.

22

23 SIGNED this 16<sup>th</sup> day of September, 2020 at Salem, Oregon.

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Signed: Matthew J. Muldoon  
Matt Muldoon

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DECLARATION OF  
BRIAN FJELDHEIM

7  
8 I, Brian Fjeldheim, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Brian Fjeldheim. I am a Senior Financial Analyst for the Public Utility  
10 Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

11 2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in  
12 this docket as follows: Staff/300 (Opening Testimony), Staff/301 (Witness Qualification  
13 Statement) and Staff/2600 (Rebuttal Testimony).

14 3. To the best of my knowledge, my pre-filed testimony and my witness qualification  
15 statement are true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,  
17 and that I understand it is made for use as evidence before the Public Utility Commission of  
18 Oregon and is subject to penalty for perjury.

19  
20 SIGNED this 16th day of September, 2020 at Salem, Oregon.

21  
22 Signed: /s/ Brian Fjeldheim  
23 Brian Fjeldheim

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DECLARATION OF  
HEATHER COHEN

8 I, Heather Cohen, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Heather Cohen. I am a Senior Utility Analyst for the Public Utility  
10 Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

11 2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in  
12 this docket as follows: Staff/400 (Opening Testimony), Staff/401 (Witness Qualification  
13 Statement) and Staff/2500 (Rebuttal Testimony).

14 3. To the best of my knowledge, my pre-filed testimony and my witness qualification  
15 statement are true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,  
17 and that I understand it is made for use as evidence before the Public Utility Commission of  
18 Oregon and is subject to penalty for perjury.

19  
20 SIGNED this 16th day of September, 2020 at Salem, Oregon.

21  
22 Signed: Heather Cohen  
23 Heather Cohen  
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DECLARATION OF  
RUSSELL BEITZEL

7  
8 I, Russell Beitzel, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Russell Beitzel. I am a Senior Utility Analyst for the Public Utility  
10 Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

11 2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in  
12 this docket as follows: Staff/500 (Opening Testimony), Staff/501 (Witness Qualification  
13 Statement) and Staff/3000 (Rebuttal Testimony).

14 3. To the best of my knowledge, my pre-filed testimony and my witness qualification  
15 statement are true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,  
17 and that I understand it is made for use as evidence before the Public Utility Commission of  
18 Oregon and is subject to penalty for perjury.

19  
20 SIGNED this 16 day of September, 2020 at Salem, Oregon.

21  
22 Signed: /s/ Russell Beitzel  
23 Russell Beitzel





























