

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 374

In the Matter of  
  
PACIFICORP d/b/a PACIFIC POWER,  
  
Request for a General Rate Revision

SIERRA CLUB'S MOTION TO ADMIT  
TESTIMONY AND EXHIBITS

In accordance with Administrative Law Judge Lackey's August 31, 2020 memorandum, Sierra Club hereby moves to admit the following pre-filed testimony and exhibits and cross examination exhibits presented at hearing into the evidentiary record in this proceeding. Attached in support of this motion are the signed declarations of Ezra Hausman and Jeremy Fisher attesting to the truth and accuracy of their pre-filed testimony and exhibits. The cross-examination exhibit referenced in this motion were presented and authenticated during the evidentiary hearing in this proceeding.

<b>Exhibit No.</b>	<b>Description</b>
Sierra Club/100	Highly Confidential Opening Testimony of Jeremy Fisher, PhD
Sierra Club/101	Curriculum Vitae of Jeremy Fisher, PhD
Sierra Club/102	Public Discovery Responses
Sierra Club/103	Confidential Direct Testimony of Rick Link in 20000-418-EA-12 (Wyo.P.S.C.) (provided as an attachment to PacifiCorp Response to Sierra Club Data Request 1.1)
Sierra Club/104	Redacted Rebuttal Testimony of Rick Link in 20000-418-EA-12 (Wyo.P.S.C.)
Sierra Club/105	WY DEQ Bart Appeal Settlement Agreement (November 2010)
Sierra Club/106	PacifiCorp Emission Reduction Plan (Nov. 2, 2010)
Sierra Club/107	PacifiCorp Comments on WY Regional Haze Plan (Aug. 26, 2013) (excerpt)

<b>Exhibit No.</b>	<b>Description</b>
Sierra Club/108	Confidential Rebuttal Testimony of Dana Ralston in UE-152253 (Wash. U.T.C) (provided as an attachment to PacifiCorp Response to Sierra Club Data Request 1.8(c))
Sierra Club/109	Redacted Supplemental Rebuttal Testimony of Cindy A. Crane in UE-152253 (Wash. U.T.C)
Sierra Club/110	PacifiCorp Response to Sierra Club Data Request 4.9 in Docket No. 13-035-184 (Utah P.S.C.)
Sierra Club/111	Hearing Transcript of Ms. Cindy Crane in Docket No. 20000-418-EA-12 (Wyo.P.S.C )
Sierra Club/112	"Attach Sierra Club 3.27" in Docket No. LC 70
Sierra Club/113	Andrew Graham, <i>Life beneath the earth in Wyo's only underground coal mine</i>
Sierra Club/114	Supplemental Testimony of Jeremy Twitchell in Docket No. UE-152253 (Wash.U.T.C.)
Sierra Club/115	Confidential Attachment 1.5-2 to PacifiCorp Response to Sierra Club Data Request
Sierra Club/116	PacifiCorp, <i>2012 Natural Gas Request for Proposals Workshop</i> (Oct. 29, 2013)
Sierra Club/117	PacifiCorp Response to Sierra Club Data Request 4.10 in Docket No. 13-035-184 (Utah P.S.C.)
Sierra Club/118	PacifiCorp Dec. 5, 2013 Memorandum (provided as a confidential attachment to PacifiCorp Response to Sierra Club Data Request 1.4)
Sierra Club/119	Highly Confidential Exhibit B Re: Bridger EPC Contract
Sierra Club/120	Direct Testimony of Susan Arigoni in Docket No. 11A-917E (Colo. P.U.C.)
Sierra Club/121	Confidential Technical Workshop: Review of Existing Analysis on Craig and Hayden Environmental Investments (provided as a confidential attachment to PacifiCorp Response to Sierra Club 2.6)
Sierra Club/122	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.6-2 (Hayden PVRP)
Sierra Club/123	Confidential Hayden SCR Recommendation Memo (provided as a confidential attachment to PacifiCorp Response to Sierra Club Data Request 2.4)
Sierra Club/124	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.4 (Xcel Energy Projects)
Sierra Club/125	Direct Testimony of James Hill in Docket No. 10M-245E (Colo. P.U.C.)
Sierra Club/300	Opening Testimony of Ezra Hausman, PhD
Sierra Club/301	Resume of Ezra D. Hausman, Ph.D.
Sierra Club/302	Oregon Governor Kate Brown's Executive Order No. 20-04
Sierra Club/303	Oregon Governor Kate Brown's Executive Order No. 17-20
Sierra Club/304	Oregon Global Warming Commission's 2018 Biennial Report to the Legislature for the 2019 Legislative Session
Sierra Club/305	Selected Public Data Responses

<b>Exhibit No.</b>	<b>Description</b>
Sierra Club/400	Confidential Rebuttal Testimony of Jeremy Fisher, PhD
Sierra Club/401	Exhibit DR-2C to the Direct Testimony of Dana Ralston in UE-152253 (Wash. U.T.C.) (provided as a confidential attachment to Sierra Club Data Request 1.8)
Sierra Club/402	Exhibit DR-3C to the Direct Testimony of Dana Ralston in UE-152253 (Wash. U.T.C.) (provided as a confidential attachment to Sierra Club Data Request 1.8)
Sierra Club/403	Selected Sierra Club Public Data Responses
Sierra Club/404	Confidential Attachment "Bridger Summary Analysis.xlsx." Summary tab to PacifiCorp Response to Sierra Club Data Request 9.1
Sierra Club/405	Confidential Rebuttal Testimony of Rick Link in 20000-418-EA-12 (Wyo. P.S.C.)
Sierra Club/406	2013 PacifiCorp IRP Confidential Vol. III
Sierra Club/407	Redacted Direct Testimony of Jeremy Fisher in 20000-418-EA-12 (Wyo. P.S.C.)
Sierra Club/408	Redacted Rebuttal Testimony of Chad Teply in 20000-418-EA-12 (Wyo. P.S.C.) (excerpt)
Sierra Club/409	PacifiCorp Response to Wyoming Industrial Energy Consumers Data Request 1.83 in 20000-418-EA-12 (Wyo. P.S.C.)
Sierra Club/410	Confidential Letter from PacifiCorp Energy's William K. Lawson to Wyoming DEQ's David Finley (Jan. 29, 2009) (provided as a confidential attachment to PacifiCorp Response to Sierra Club Data Request 9.6)
Sierra Club/411	Exhibit Sierra Club/114, 2003 PacifiCorp Control Report in UE 246
Sierra Club/412	Exhibit Sierra Club/115, Air Quality Reference Case Investments 2005 in UE 246
Sierra Club/413	Cal. P.U.C Advice Letter 507-E (July 21, 2014)
Sierra Club/414	Docket No. UE-191024 et al. Proposed Settlement Stipulation (Wash. U.T.C)
Sierra Club/500	Rebuttal Testimony of Ezra Hausman, PhD
Sierra Club/600	Confidential Supplemental Rebuttal Testimony of Jeremy Fisher, PhD
Sierra Club/601	PacifiCorp Response to Sierra Club Data Request 8.2 – 1st Revised
Sierra Club/602	Confidential attachment to PacifiCorp Response to Sierra Club 8.2, 1st Revised (excerpt)
Sierra Club/703	Confidential PacifiCorp Response to Sierra Club Data Request 11.3
Sierra Club/706	Confidential PacifiCorp Response to Sierra Club Data Request 11.6
Sierra Club/707	Confidential PacifiCorp Response to Sierra Club Data Request 11.7
Sierra Club/708	Confidential Attachment to Sierra Club 9.1, "BCC Production-Operating Cost Schedules (4-unit Coal Operation).xlsx", tab "OPEX"
Sierra Club/709	Confidential Attachment to Sierra Club 9.1, "BRIDGER (2015 IRP).xlsx"
Sierra Club/713	Confidential Ralston Workpaper "CONF Exhibit_PAC_2603_CONF and WPs.xlsx "
Sierra Club/714	Confidential Link Workpaper "Link Figures 11, 12, 14.xlsx"
Sierra Club/715	Attachment to PacifiCorp Response to Sierra Club Data Request 1.6

<b>Exhibit No.</b>	<b>Description</b>
Sierra Club/716	PacifiCorp Response to Sierra Club Data Request 12.5
Sierra Club/717	Confidential PacifiCorp Response to Sierra Club Data Request 7.1
Sierra Club/718	Confidential Attachment to Sierra Club 7.1-1
Sierra Club/719	PacifiCorp Response to Sierra Club Data Request 7.2
Sierra Club/720	Confidential Attachment to Sierra Club 7.2-2: "PIRA REDACTED Nominal\$ 10.10.13 PROPRIETARY CONF.xlsx"
Sierra Club/721	Confidential Attachments to PacifiCorp Response to Sierra Club 8.3 - 1st supp.
Sierra Club/722	PacifiCorp Response to Sierra Club Data Request 12.2
Sierra Club/723	Attachment to Sierra Club 12.2 (Gateway West)
Sierra Club/724	Attachment to Sierra Club 12.2 (Aeolus West)
Sierra Club/726	Confidential Attachment to Sierra Club 7.2-1 "PIRA_ nominal\$ _2013 09 04 PROPRIETARY CONF.xlsx"
Sierra Club/728	PacifiCorp Response to Sierra Club 12.3
Sierra Club/729	PacifiCorp Response to Sierra Club 12.4
Sierra Club/732	Confidential Attachment to Sierra Club 12.1-1 "BRIDGER.xlsx"
Sierra Club/733	Confidential Attachment to Sierra Club 1.8 "BRIDGER.xlsx"

Dated: September 17, 2020

Respectfully submitted,

*/s/ Rose Monahan* \_\_\_\_\_

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DECLARATION OF JEREMY I. FISHER

I, Jeremy I. Fisher declare as follows:

1. My name is Jeremy I. Fisher. I am the Senior Advisor for Strategic Research and Development for the Sierra Club Environmental Law Program. My work address is 2101 Webster Street, Suite 1300, Oakland, CA 94612.
2. I am the same Jeremy I. Fisher that previously filed testimony and exhibits on behalf of Sierra Club in this matter (Sierra Club/100-125, Sierra Club/400-414, and Sierra Club/600-602).
3. My pre-filed testimony and exhibits are true and accurate. If I were asked the same questions under oath today, my answers would be the same.

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 penalty for perjury.

Executed this 16 day of September 2020 at Piedmont, California

Jeremy I. Fisher



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DECLARATION OF EZRA D. HAUSMAN

I, Ezra D. Hausman declare as follows:

1. My name is Ezra D. Hausman, Ph.D. I am an independent consultant doing business as Ezra Hausman Consulting. My work address is 77 Kaposia Street, Auburndale, Massachusetts 02466. In this proceeding, I testified on behalf of Sierra Club.
2. I am the same Ezra D. Hausman that previously filed testimony and exhibits on behalf of Sierra Club in this matter (Sierra Club/300-305 and Sierra Club/500).
3. My pre-filed testimony and exhibits are true and accurate. If I were asked the same questions under oath today, my answers would be the same.

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 penalty for perjury.

Executed this 16<sup>th</sup> day of September 2020 at Auburndale, Massachusetts

  
\_\_\_\_\_  
Ezra D. Hausman, Ph.D.