



September 1, 2021

*Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem, OR 97301

**Re: Docket UE-390—Sierra Club’s Motion to Admit Pre-Filed Testimony and Exhibits and Witness Declaration**

Please find enclosed for filing Sierra Club’s Motion to Admit Pre-Filed Testimony and Exhibits and witness declaration of Ed Burgess.

Please let me know if you have any questions or concerns.

Respectfully submitted,

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Rose Monahan  
Staff Attorney  
Sierra Club Environmental Law Program  
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Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 390

In the Matter of  
  
PACIFICORP d/b/a PACIFIC POWER,  
  
2022 Transition Adjustment Mechanism

SIERRA CLUB'S MOTION TO ADMIT  
PRE-FILED TESTIMONY AND  
EXHIBITS

In accordance with Administrative Law Judge Rowe's August 24, 2021 memorandum, Sierra Club hereby moves to admit the following pre-filed testimony and exhibits into the evidentiary record in this proceeding. Attached in support of this motion is the signed declaration of Ed Burgess attesting to the truth and accuracy of his pre-filed testimony and exhibits.

**Sierra Club Pre-Filed Exhibits**

**Witness: Ed Burgess**

<b>Exhibit No.</b>	<b>Description</b>
Sierra Club/100	Highly Confidential Opening Testimony of Ed Burgess
Sierra Club/101	Curriculum Vitae of Ed Burgess
Sierra Club/102	Redacted PacifiCorp Long-Term Fuel Supply Plan for the Jim Bridger Plant Comparison Report (provided as an attachment to PacifiCorp Response to Sierra Club Data Request 1.31)
Sierra Club/103	Selected Public PacifiCorp Data Responses
Sierra Club/104	PacifiCorp Response to OPUC Data Request 57
Sierra Club/105	Excerpts from 2021 ECAC Evidentiary Hearing Transcript in California Public Utilities Commission Proceeding A.20-08-002
Sierra Club/106 <sup>1</sup>	Confidential Attachment to PacifiCorp Response Sierra Club Data Request 1.4
Sierra Club/112	Selected Confidential PacifiCorp Data Responses
Sierra Club/113	PacifiCorp Response to OPUC Data Request 72
Sierra Club/114	PacifiCorp Response to Sierra Club Data Request 8.9 in California Public Utilities Commission Proceeding A.20-08-002

<sup>1</sup> Please note that Sierra Club/107-111 were listed as placeholder exhibits that Sierra Club is not moving into the record.

<b>Exhibit No.</b>	<b>Description</b>
Sierra Club/115	Confidential Attachment OPUC 71-1 to PacifiCorp Response to OPUC Data Request 71
Sierra Club/116	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 1.6
Sierra Club/117	Confidential Attachment OPUC 71-2 to PacifiCorp Response to OPUC Data Request 71
Sierra Club/118	Redacted PacifiCorp Confidential Long-Term Fuel Supply Plan for the Jim Bridger Plant
Sierra Club/119	Corrected Supplemental Direct Testimony of David G. Webb (PAC/600) in California Public Utilities Commission Proceeding A.20-08-002
Sierra Club/120	PacifiCorp Response to Sierra Club Data Request 8.7 in California Public Utilities Commission Proceeding A.20-08-002
Sierra Club/121	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.3
Sierra Club/122	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.7
Sierra Club/123	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.22
Sierra Club/124	PacifiCorp Response to Sierra Club Data Request 3.1 in California Public Utilities Commission Proceeding A.20-08-002
Sierra Club/125	PacifiCorp Response to Sierra Club Data Request 5.1 in California Public Utilities Commission Proceeding A.20-08-002
Sierra Club/126	PacifiCorp Response to Sierra Club Data Request 7.1 in California Public Utilities Commission Proceeding A.20-08-002
Sierra Club/127	Excerpt from Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 1.32
Sierra Club/200	Confidential Rebuttal Testimony of Ed Burgess
Sierra Club/201	PacifiCorp Response to Sierra Club Data Request 5.5
Sierra Club/202	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.6
Sierra Club/203	Taylor Kuykendall, <i>US coal deliveries increasingly arrive to power plants on shorter-term contract</i>

Dated: September 1, 2021

Respectfully submitted,

/s/ Rose Monahan

Rose Monahan (*pro hac vice*)

Joshua Smith

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DECLARATION OF ED BURGESS

I, Ed Burgess, declare as follows:

1. My name is Ed Burgess. I am a Senior Director at Strategen Consulting. My work address is 2150 Allston Way, Suite 400, Berkeley, California 94704.
2. I am the same Ed Burgess that previously filed testimony and exhibits on behalf of Sierra Club in this matter (Sierra Club/100-127<sup>1</sup> and Sierra Club/200-203).
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 31 day of August 2021 at Berkeley, CA



Ed Burgess

<sup>11</sup> Sierra Club/107-111 and Sierra Club/118 were listed a placeholder exhibits that Sierra Club no longer seeks to admit into the record in this proceeding.