

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

3 UE 390

4 In the Matter of
5 PACIFICORP, dba PACIFIC POWER
6 2022 Transition Adjustment Mechanism.
7

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

8 Staff of the Public Utility Commission of Oregon (Staff) moves for admission of the
9 following pre-filed testimony and exhibits, which have not previously been admitted, into the
10 record in the above-captioned docket:

11

12 Staff Opening Testimony	
13 Staff/100-104	Moya Enright
14 Staff/200-203	Heather Cohen
15 Staff/300-303	Nadine Hanhan
16 Staff/400-403	Brian Fjeldheim
17 Staff/500-503	Kathy Zarate
18 Staff/600-602	John Fox
19 Staff/900-901	Scott Gibbens

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21 Staff Rebuttal and Cross-Answering Testimony	
22 Staff/1000	Moya Enright
23 Staff/1100	Kathy Zarate
24 Staff/1300	Scott Gibbens
25 Staff/1500	John Fox
26 Staff/1600-1601	Nadine Hanhan

1 This motion is supported by the declarations of Staff witnesses Brian Fjeldheim, Heather
2 Cohen, John Fox, Nadine Hanhan, Kathy Zarate, Moya Enright and Scott Gibbens that attest to
3 the truthfulness of their testimony. The declarations are attached to this motion.

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5 DATED this 1st day of September, 2021.

6

Respectfully submitted,

7

ELLEN F. ROSENBLUM
Attorney General

8

/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
HEATHER COHEN

7
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 Opening Testimony (Staff/200) and my witness
12 qualification statement (Staff/201).

13 3. To the best of my knowledge my pre-filed testimony is true and accurate.

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

17
18 SIGNED this 31st day of August, 2021 at Salem, Oregon.

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20 Signed: Heather Cohen
21 Heather Cohen

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DECLARATION OF
NADINE HANHAN

7
8 I, Nadine Hanhan, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Nadine Hanhan. I am a Senior Utility Analyst for the Public Utility
10 Commission of Oregon (“Staff”) in the Energy Resources and Planning Division.
11 2. On behalf of Staff, I drafted Opening Testimony (Staff/300), my witness
12 qualification statement (Staff/301) and Reply and Cross-Answering Testimony (Staff/1600).
13 3. To the best of my knowledge my pre-filed testimony is true and accurate.

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

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18 SIGNED this 31 day of August, 2021 at Happy Valley, Oregon.

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20 Signed: 
21 Nadine Hanhan

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DECLARATION OF
KATHY ZARATE

7
8 I, Kathy Zarate, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Kathy Zarate. I am a Utility Economist 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 Opening Testimony (Staff/500), my witness
12 qualification statement (Staff/501) and Reply and Cross-Answering Testimony (Staff/1100).
13 3. To the best of my knowledge my pre-filed testimony is true and accurate.

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

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18 SIGNED this 31 day of August, 2021 at Salem, Oregon.

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20 Signed: Kathy Zarate
21 Kathy Zarate
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DECLARATION OF
MOYA ENRIGHT

I, Moya Enright, declare under penalty of perjury under the laws of the State of Oregon:

- 1. My name is Moya Enright. I am a Senior Economist for the Public Utility Commission of Oregon (“Staff”) in the Energy Rates Finance and Audit Division.
- 2. On behalf of Staff, I drafted Opening Testimony (Staff/100), my witness qualification statement (Staff/101) and Reply and Cross-Answering Testimony (Staff/1000).
- 3. To the best of my knowledge my pre-filed testimony is true and accurate.

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

SIGNED this 31st day of August, 2021 at San Mateo, California.

MEnright

Signed: _____
Moya Enright

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DECLARATION OF
SCOTT GIBBENS

7
8 I, Scott Gibbens, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Scott Gibbens. I am a Policy and Economic Analysis Manager for the
10 Public Utility Commission of Oregon (“Staff”) in the Strategy and Integration Division.

11 2. On behalf of Staff, I drafted Opening Testimony (Staff/900), my witness
12 qualification statement (Staff/901) and Reply and Cross-Answering Testimony (Staff/1300).

13 3. My witness qualification inadvertently includes my former title. I was promoted to
14 my current position, described above, on February 1, 2021.

15 4. To the best of my knowledge my pre-filed testimony is true and accurate. Aside
16 from my title and division, my witness qualification statement remains true and accurate.

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

20
21 SIGNED this 31st day of August, 2021 at Salem, Oregon.

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23 Signed: Scott Gibbens
24 Scott Gibbens
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