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September 7, 2021

Via Electronic Filing

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
2022 Annual Power Cost Update.
Docket No. UE 391

Dear Filing Center:

Please find enclosed the Motion to Admit Pre-filed Testimony and Exhibits of the Alliance of Western Energy Consumers in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 391

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) MOTION TO ADMIT PRE-FILED
COMPANY,) TESTIMONY AND EXHIBITS OF THE
) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
2022 Annual Power Cost Update Tariff.)
_____)

The Alliance of Western Energy Consumers (“AWEC”) moves for admission into the record of this proceeding the following pre-filed testimony and exhibits submitted on behalf of AWEC.

<u>Exhibit</u>	<u>Description</u>
Confidential AWEC/100	Confidential Opening Testimony of Bradley G. Mullins
AWEC/101	Qualification Statement of Bradley G. Mullins
AWEC/102	2022 Production Tax Credit Rate Analysis
Confidential AWEC/103	COB Margins Analysis
Confidential AWEC/104	Avangrid Capacity Contract Analysis

<u>Exhibit</u>	<u>Description</u>
Confidential AWEC/200	Confidential Opening Testimony of Lance D. Kaufman
AWEC/201	Curriculum Vitae of Lance D. Kaufman
Confidential AWEC/202	PGE Responses to Data Requests

The Declarations of Lance D. Kaufman and Bradley G. Mullins attesting to the truth and accuracy of their testimony and exhibit filings are attached.

Dated this 7th day of September, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 391

In the Matter of)	
)	DECLARATION OF
PORTLAND GENERAL ELECTRIC)	LANCE D. KAUFMAN
COMPANY,)	
)	
2022 Annual Power Cost Update Tariff.)	
_____)	

I, LANCE D. KAUFMAN, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Lance D. Kaufman. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers (“AWEC”) in this matter.

2. On behalf of AWEC, I sponsored testimony and exhibits in this proceeding (AWEC/200-202).

3. To the best of my knowledge, my testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 7 day of September, 2021.



LANCE D. KAUFMAN

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 391

In the Matter of)	
)	DECLARATION OF
PORTLAND GENERAL ELECTRIC)	BRADLEY G. MULLINS
COMPANY,)	
)	
2022 Annual Power Cost Update Tariff.)	
_____)	

I, BRADLEY G. MULLINS, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers (“AWEC”) in this matter.

2. On behalf of AWEC, I sponsored testimony and exhibits in this proceeding (AWEC/100-104 and Stipulating Parties/100-101).

3. To the best of my knowledge, my testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 7 day of September, 2021.



BRADLEY G. MULLINS