



September 16, 2022

*Via Electronic Filing*

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

**Re: Docket UE-400—Sierra Club’s Motion to Admit**

Please find enclosed Sierra Club’s Motion to Admit Pre-filed Testimony and Exhibits in the above-referenced docket.

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

Respectfully submitted,

/s/ Rose Monahan

Rose Monahan  
Staff Attorney  
Sierra Club Environmental Law Program  
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Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 400

In the Matter of  
  
PACIFICORP d/b/a PACIFIC POWER,  
  
2023 Transition Adjustment Mechanism

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

Sierra Club 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	Confidential Opening Testimony of Ed Burgess (Sierra Club/100) in UE 375 (excerpt)
Sierra Club/103	Confidential Opening Testimony of Ed Burgess (Sierra Club/100) in UE 390 (excerpt)
Sierra Club/104	Redacted PacifiCorp Long-Term Fuel Supply Plan for the Jim Bridger Plant (Attach Sierra Club 4.2)
Sierra Club/105	Selected PacifiCorp Public Data Responses
Sierra Club/106	PacifiCorp Response to Western Resource Advocates Data Request 4.28 in Utah Public Service Commission Docket No. 21-035-09
Sierra Club/107	PacifiCorp Response to Western Resource Advocates Data Request 4.2 in Utah Public Service Commission Docket No. 21-035-09
Sierra Club/108	Highly Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 4.1 “GEN Forecast_2022BP_v2_20220314_Scenario 3”
Sierra Club/109	Highly Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 4.1 “GEN Forecast_2022BP_v2_20220314_Scenario 6”

<b>Exhibit No.</b>	<b>Description</b>
Sierra Club/110	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.15 “Attach SC 2.15-1 CONF”
Sierra Club/111	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.8 “Attach SC 2.8-2 CONF”
Sierra Club/112	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 3.13 “Attach SC 3.13 CONF”
Sierra Club/113	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.9 “Attach SC 2.9 CONF”
Sierra Club/114	Confidential PacifiCorp Response to Sierra Club Data Request 3.2
Sierra Club/115	Public Data Responses from California Public Utilities Commission Proceeding No. A.21-08-004
Sierra Club/116	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 3.6 “Attach SC 3.6 CONF”
Sierra Club/117	Highly Confidential PacifiCorp Response to Sierra Club Data Request 5.8
Sierra Club/118	Selected PacifiCorp Responses to ALJ Bench Requests in LC 77
Sierra Club/119	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 2.16 “Attach ALJ Bench Request 1-1 CONF”
Sierra Club/120	Confidential Attachment to PacifiCorp Response to Sierra Club Data Request 1.11

Dated: September 16, 2022

Respectfully submitted,

/s/ Rose Monahan

Rose Monahan (*pro hac vice*)  
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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 400

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

2023 Transition Adjustment Mechanism

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/100-120).
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 16th day of September 2022 at Portland, Oregon.



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Ed Burgess