

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

3 **UE 416**

4 In the Matter of  
5 PORTLAND GENERAL ELECTRIC  
6 COMPANY,

**AMENDED STAFF MOTION  
TO ADMIT NVPC TESTIMONY**

7 Request for a General Rate Revision.  
8

9 Staff of the Public Utility Commission of Oregon asks the Administrative Law Judge  
10 (ALJ) to admit into the record of the above-captioned docket the exhibits listed below. The  
11 listed exhibits address the NVPC portion of Portland General Electric Company's general rate  
12 case.

12	Staff 100	Opening Testimony of Julie Jent
13	Staff 101	Witness Qualifications Statement of Julie Jent
14	Staff 102	Non-confidential Data Request Responses in support of Testimony
15	Staff 103	Confidential Data Request Responses in support of Testimony
16	Staff 104	Highly Confidential Exhibit
17	Staff 200	Opening Testimony of Ishraq Ahmed
18	Staff 201	Witness Qualifications Statement of Ishraq Ahmed
19	Staff 202	Non-confidential Data Request Responses in Support of Testimony
20	Staff 203	Confidential Data Request Responses in Support of Testimony
21	Staff 204	Highly Confidential Data Request Responses in Support of Testimony
22	Staff 300	Opening Testimony of Curtis Dlouhy
23	Staff 301	Witness Qualifications Statement of Curtis Dlouhy
24	Staff 302	Non-confidential Data Request Responses of Curtis Dlouhy
25	Staff 2800	Rebuttal Testimony of Curtis Dlouhy
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1 Staff witness Julie Jent is adopting the testimony of Ishraq Ahmed as he has left the  
2 Commission. The declarations of Julie Jent and Curtis Dlouhy attesting to the truthfulness of  
3 their testimony are attached to this motion.

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5 SIGNED this 28<sup>th</sup> day of August 2023.

6 Respectfully submitted,

7 ELLEN F. ROSENBLUM  
8 Attorney General

9 */s/ Stephanie S. Andrus*

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Stephanie S. Andrus, OSB No. 925123  
11 Sr. Assistant Attorney General  
12 Of Counsel for Attorneys of Oregon Public  
13 Utility Commission Staff

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

3 **UE 416**

4  
5 In the Matter of  
6 **PORTLAND GENERAL ELECTRIC**  
7 **COMPANY,**  
Request for a General Rate Revision.

DECLARATION OF JULIE JENT

8 I, JULIE JENT, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Economist in the Energy Costs Section of the Rates, Safety and  
10 Utility Performance Division of the Oregon Public Utility Commission.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored NVPC  
12 testimony for the above-captioned docket pre-filed as Staff Exhibit No. 100 and drafted a witness  
13 qualifications statement, pre-filed as Staff Exhibit 101.

14 3. In addition to sponsoring my own testimony in Staff Exhibit No. 100, I am also  
15 adopting NVPC testimony sponsored by Ishraq Ahmed, pre-filed as Staff Exhibit No. 200.

16 To the best of my knowledge, the pre-filed testimony in Staff Exhibit Nos. 100 and 200  
17 and my witness qualifications statement are true and accurate.

18  
19 I hereby declare that the above statement is true to the best of my knowledge and  
20 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

21  
22 SIGNED this 28th day of August, 2023.

23  
24   
25 JULIE JENT  
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1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UE 416**

4  
5 In the Matter of  
6 PORTLAND GENERAL ELECTRIC  
7 COMPANY,

DECLARATION OF CURTIS DLOUHY

8 Request for a General Rate Revision.

9 I, CURTIS DLOUHY, state the following, under penalty of perjury in the State of Oregon:

10 1. I am a Senior Economist in the Strategy and Integration Division of the Oregon  
11 Public Utility Commission.

12 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
13 above-captioned docket pre-filed as Staff Exhibit Nos. 300 and 2800 and drafted a witness  
14 qualifications statement, pre-filed as Staff Exhibit 301.

15 To the best of my knowledge, my pre-filed testimony and my witness qualifications  
16 statement are true and accurate.

17 I hereby declare that the above statement is true to the best of my knowledge and  
18 belief, and that I understand it is made for use as evidence in court and is subject to  
19 penalty for perjury.

20 SIGNED this 28th day of August, 2023.

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CURTIS DLOUHY, Ph.D.