

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UE 416**

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
Request for a General Rate Revision.

STAFF MOTION TO ADMIT  
PRE-FILED EXHIBITS

Staff of the Public Utility Commission of Oregon (Staff) requests the Administrative Law Judge (ALJ) admit the following pre-filed exhibits into the record in the above-captioned case.<sup>1</sup>

Exhibit No.	Description
Staff 400	Opening Testimony of Matt Muldoon
Staff 401	Witness Qualifications Statement of Matt Muldoon
Staff 402	ROE – Peer Screen, Dividends, EPS, Hamada Adjustments
Staff 403	ROE – Three-State DCF Modeling
Staff 404	ROE – Three State DCF Modeling Results
Staff 405	ROE – Capital Asset Pricing Model (CAPM)
Staff 406	ROE – Gordan Growth, Single State DCF
Staff 407	ROE – US BEA Historical GDP Growth
Staff 408	ROE – TIPS Implies Inflation
Staff 409	Financial News Investors Are Seeing
Staff 410	EI Financial Review
Staff 411	Value Line (VL) Electric Utilities
Staff 412	PGE Responses to DRs Regarding UM 217 as Offset
Staff 500	Opening Testimony of Itayi Chipanera
Staff 501	Witness Qualifications Statement of Itayi Chipanera
Staff 600	Opening Testimony of Michelle Scala
Staff 601	Witness Qualifications Statement of Michelle Scala
Staff 602	Non-confidential Responses to Data Requests
Staff 700	Opening Testimony of Ishraq Ahmed
Staff 701	Witness Qualifications Statement of Ishraq Ahmed
Staff 702	Non-confidential Responses to Data Requests
Staff 800	Opening Testimony of Bret Stevens and Robert Young
Staff 801	Staff’s Revenue Requirement Adjustment Calculation
Staff 802	Non-confidential Response to Staff Data Requests
Staff 900	Opening Testimony of Russ Beitzel
Staff 901	Witness Qualifications Statement of Russ Beitzel
Staff 902	PGE Responses to Staff Data Requests
Staff 1000	Opening Testimony of Madison Bolton

<sup>1</sup> Staff Exhibits 100-302 and Staff 2800 concerning NVPC have already been admitted into the record.

1	Staff 1001	Witness Qualifications Statement of Madison Bolton
	Staff 1002	Non-confidential Responses to Staff Data Requests
	Staff 1003	Confidential Responses to Staff Data Requests
2	Staff 1004	PGE's Errata 2024 ROO workpaper
	Staff 1100	Opening Testimony of Curtis Dlouhy
3	Staff 1101	Non-confidential Responses to Data Requests used in Support of Testimony
	Staff 1102	Confidential Data Responses used in Support of Testimony
4	Staff 1103	News Used in Support of Testimony
	Staff 1200	Opening Testimony of Bret Farrell
5	Staff 1201	Witness Qualifications Statement of Bret Farrell
	Staff 1202	PGE Response to OPUC Data Request 236
6	Staff 1203	PGE Response to OPUC Data Request 595
	Staff 1204	Staff Workpaper
7	Staff 1205	PGE Response to Staff Data Request 599
	Staff 1206	PGE Response to Staff Data Request 598
8	Staff 1207	PGE Response to Staff Data Request 600
	Staff 1208	Staff Workpaper
9	Staff 1209	Staff Adjustment Workpaper
10	Staff 1210	PGE Response to Staff Data Request 354, Attachment A
	Staff 1211	PGE Response to Staff Data Request 354, Attachment A (Electric Format)
11	Staff 1212	PGE Response to Staff Data Request 354, Attachment B
	Staff 1213	Confidential Response to Staff Data Request 356
12	Staff 1300	Opening Testimony of Julie Jent
	Staff 1301	PGE Responses to Staff Data Requests
13	Staff 1302	Confidential PGE Response to Staff Data Request
	Staff 1303	Confidential Staff Workpaper wage and salary model
14	Staff 1400	Opening Testimony of Charles Lockwood
	Staff 1401	Witness Qualifications Statement of Charles Lockwood
15	Staff 1402	PGE Response to Staff Data Request 351, Attachment B
	Staff 1403	Confidential PGE Response to Staff DR 352A
16	Staff 1404	PGE Response to Staff DRs 487-89
	Staff 1500	Opening Testimony of Luz Mondragon
17	Staff 1501	Witness Qualifications Statement of Luz Mondragon
	Staff 1502	PGE Responses to Staff Data Requests
18	Staff 1600	Opening Testimony of Mitchell Moore
	Staff 1601	Witness Qualifications Statement of Mitchell Moore
19	Staff 1602	PGE Responses to Staff Data Requests
	Staff 1603	Staff workpaper
20	Staff 1700	Opening Testimony of Ming Peng
	Staff 1701	Witness Qualifications Statement of Ming Peng
21	Staff 1702	PGE Responses to Staff Data Requests
	Staff 1800	Opening Testimony of Rose Pileggi
22	Staff 1801	Witness Qualifications Statement of Rose Pileggi
	Staff 1802	PGE Responses to Staff Data Requests
23	Staff 1803	Confidential Exhibits in Support of Opening Testimony
	Staff 1804	Highly Confidential Exhibits in Support of Opening Testimony
24	Staff 1805	Exhibits in Support of Opening Testimony
	Staff 1806	Confidential Exhibits in Support of Opening Testimony
25	Staff 1807	Confidential Exhibits in Support of Opening Testimony
	Staff 1808	Confidential Exhibits in Support of Opening Testimony
26	Staff 1900	Opening Testimony of Eric Shierman

1	Staff 1901	Witness Qualifications Statement of Eric Shierman
	Staff 1902	Exhibits in Support of Opening Testimony
2	Staff 1903	Confidential Staff Exhibit in Support of Testimony
	Staff 1904	Exhibits in Support of Opening Testimony
3	Staff 1905	Exhibits in Support of Opening Testimony
	Staff 1906	Exhibits in Support of Opening Testimony
4	Staff 1907	Exhibits in Support of Opening Testimony
	Staff 1908	Exhibits in Support of Opening Testimony
5	Staff 1909	Exhibits in Support of Opening Testimony
	Staff 2000	Opening Testimony of Bret Stevens
6	Staff 2001	Witness Qualifications Statement of Bret Stevens
	Staff 2002	PGE Responses to Staff Data Requests
7	Staff 2100	Opening Testimony of Robert young
	Staff 2101	Witness Qualifications Statement of Robert Young
8	Staff 2102	Representative Staff Data Requests
	Staff 2103	Representative PGE Responses to Staff Data Requests
9	Staff 2104	PGE Response to Staff DR 586-OH FITNES Dist.
	Staff 2105	PGE Response to Staff DR 586-Brookwood Substation
10	Staff 2106	PGE Response to Staff DR 792-Brookwood Substation
	Staff 2107	PGE Response to Staff DR 586-Orenco Substation
11	Staff 2108	PGE Response to Staff DR 586-Helvetia Substation
	Staff 2109	PGE Response to Staff DR 590-Helvetia Substation
12	Staff 2110	PGE Response to Staff DR 586-OH FITNES Trans.
	Staff 2111	PGE Response to Staff DR 789-OH FITNES Trans
13	Staff 2112	PGE Response to Staff DR 586-Downtown Core
	Staff 2113	PGE Response to Staff DR 586-Blue Lake Phase II
14	Staff 2114	PGE Response to Staff DR 586-Memorial Substation
	Staff 2115	PGE's March 2023 OH FITNES Program Health Report
15	Staff 2200	Opening Testimony of Curtis Dlouhy, Matt Muldoon, Michelle Scala, and Bret Stevens
16	Staff 2201	PGE Responses to Staff Data Requests
17	Staff 2300	Opening Testimony of Ishraq Ahmed, Curtis Dlouhy, Julie Jent, and Rose Pileggi
18	Staff 2301	PGE's Responses to Staff Data Requests
	Staff 2302	Staff Workpapers in Support of Opening Testimony
19	Staff 2400	Opening Testimony of Melissa Nottingham and Scott Shearer
	Staff 2401	Witness Qualifications Statement of Melissa Nottingham
20	Staff 2402	Witness Qualifications Statement of Scott Shearer
	Staff 2403	PGE Responses to Staff Data Requests
21	Staff 2500	Opening Testimony of Lisa Gorsuch
	Staff 2501	Witness Qualifications Statement of Lisa Gorsuch
22	Staff 2600	Opening Testimony of Scott Lundquist
	Staff 2601	Witness Qualifications Statement of Scott Lundquist
23	Staff 2602	Non-confidential PGE Responses to Data Requests
	Staff 2603	Confidential PGE Responses to Data Requests
24	Staff 2700	Opening Testimony of August Ankum and Warren Fischer
	Staff 2701	Witness Qualifications Statement of August Ankum
25	Staff 2702	Witness Qualifications Statement of Warren Fischer
	Staff 2703	PGE Workbook
26	Staff 2704	PGE Non-confidential Responses to Data Requests
	Staff 2705	PGE Confidential Responses to Data Requests

1	Staff 2706	PGE Highly Confidential Responses to Data Requests
	Staff 2702	Summary of PGE Plant Additions
2	Staff 2708	List of Project Justification Forms Examined
	Staff 2709	Confidential Project Justification Form Evaluation Tables
3	Staff 2710	Summary of Project Justification Form Results
4	Staff 2711	Testing Sample of Confidential Monthly Project Status and other PGE Program Reports
	Staff 2712	Summary of Restated MMA Adjustment
5	Staff 2713	Restated GRC MMA Workpaper (Highly Confidential)
	Staff 2900	Rebuttal Testimony of Matt Muldoon
6	Staff 2901	Value Line (VL) Electric Utilities
	Staff 2902	ROE – Peer Screen, Dividends, EPS, Hamada Adjustments
7	Staff 2903	ROE- Three State DCF Modeling
	Staff 2904	ROE – Three Stage DCF Modeling Results
8	Staff 2905	ROE – Capital Asset pricing Model (CAPM)
	Staff 2906	ROE – Gordon Growth, Single State DCF
9	Staff 2907	Financial News Investors are Seeing
	Staff 2908	EI Financial Review
10	Staff 2909	Public Comments ( <i>See Errata filed September 7, 2023</i> )
	Staff 3000	Rebuttal Testimony of Itayi Chipanera
11	Staff 3100	Rebuttal Testimony of Michelle Scala
	Staff 3101	Confidential PGE Responses to Data Requests
12	Staff 3200	Rebuttal Testimony of Bret Stevens and Robert Young
	Staff 3201	PGE Response to Staff Data Request
13	Staff 3300	Rebuttal Testimony of Bret Stevens
	Staff 3301	PGE’s Vegetation Citations and Proposed Thresholds
14	Staff 3302	PGE Audit Report E22-62
	Staff 3400	Rebuttal Testimony of Curtis Dlouhy
15	Staff 3500	Rebuttal Testimony of Bret Farrell
	Staff 3600	Rebuttal Testimony of Julie Jent
16	Staff 3700	Rebuttal Testimony of Curtis Dlouhy, Matt Muldoon, Michelle Scala, and Bret Stevens
17	Staff 3800	Rebuttal Testimony of Curtis Dlouhy, Julie Jent, Rose Pileggi
18	Staff 3900	Rebuttal Testimony of Melissa Nottingham and Scott Shearer
	Staff 4000	Rebuttal Testimony of August Ankum
19	Staff 4100	Rebuttal Testimony of Madison Bolton and Bret Stevens
	Staff 4101	PGE Response to Staff Data Request
20	Staff 4200	Rebuttal Testimony of Eric Shierman

21           The testimony of Staff witnesses is supported by declarations of each witness attesting to  
22 the truthfulness of their testimony and the statements in the Witness Qualifications Statement.

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1 Staff Witness Curtis Dlouhy has adopted the testimony of Ishraq Ahmed, and attests to the  
2 truthfulness of his testimony.

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DATED this 29<sup>th</sup> day of September 2023.

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Respectfully submitted,  
ELLEN F. ROSENBLUM  
Attorney General

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*/s/ Stephanie S. Andrus*

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

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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,  
8  
9    Request for a General Rate Revision.

10    |    DECLARATION OF MATT MULDOON

11    I, MATT MULDOON, state the following, under penalty of perjury in the State of Oregon:

- 12                    1.    I am a manager employed in the Accounting and Finance Section of the Rates,  
13                    Safety, and Utility Performance Division of the Oregon Public Utility Commission.  
14                    2.    On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
15                    above-captioned docket pre-filed as Staff Exhibit Nos. 400 and 2900, co-sponsored Joint  
16                    Testimony pre-filed as Staff Exhibit Nos. 2200 and 3700, and sponsored a Witness  
17                    Qualifications Statement pre-filed as Staff Exhibit No. 401.  
18                    3.    To the best of my knowledge, the pre-filed testimony and my Witness  
19                    Qualifications Statement are true and accurate.

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

23                    SIGNED this 28<sup>th</sup> day of September, 2023.

24    *Matt Muldoon*  
25    \_\_\_\_\_  
26    MATT MULDOON

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 ITAYI CHIPANERA

8 I, ITAYI CHIPANERA, state the following, under penalty of perjury in the State of Oregon:

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

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit Nos. 500 and 3000 and a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 501.

14 To the best of my knowledge, the pre-filed testimony is true and accurate.

15  
16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
18 penalty for perjury.

19 SIGNED this 28<sup>th</sup> day of September, 2023.

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21 *Itayi Chipanera*  
22 ITAYI CHIPANERA

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**  
**UE 416**

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
Request for a General Rate Revision.

DECLARATION OF MICHELLE SCALA

I, MICHELLE SCALA, state the following, under penalty of perjury in the State of Oregon:

1. I am the Energy Justice Program Manager of the Oregon Public Utility Commission.
2. On behalf of Staff of the Public Utility Commission, I sponsored testimony and a Witness Qualifications Statement for the above-captioned docket pre-filed as Staff Exhibit Nos. 600, 3100, and 601, and co-sponsored Joint Testimony pre-filed as Staff Exhibit Nos. 2200 and 3700.
3. To the best of my knowledge, the pre-filed testimony and my Witness Qualifications Statement are true and accurate.

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.

SIGNED this 28<sup>th</sup> day of September, 2023.

*Michelle Scala*  
MICHELLE SCALA



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 MADISON BOLTON

8 I, MADISON BOLTON, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Energy and Policy Analyst employed in the Utility Strategy and  
10 Integration Division of the Oregon Public Utility Commission.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony and a  
12 Witness Qualifications Statement for the above-captioned docket pre-filed as Staff Exhibit Nos.  
13 1000 and 1001 and co-sponsored joint testimony pre-filed as Staff Exhibit No. 4100.

14 3. To the best of my knowledge, the pre-filed testimony and my Witness  
15 Qualifications Statement are true and accurate.

16  
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  
penalty for perjury.

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20 SIGNED this 28<sup>th</sup> day of September, 2023.

21  
22 *Madison Bolton*

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MADISON BOLTON



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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 416**

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
Request for a General Rate Revision.

DECLARATION OF BRET FARRELL

I, BRET FARRELL, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Utility and Energy Analyst employed in the Accounting and Finance Section of the Rates, Safety, and Utility Performance Program (RSUP) of the Oregon Public Utility Commission.

2. On behalf of Staff of the Public Utility Commission, I sponsored testimony and a Witness Qualifications Statement for the above-captioned docket pre-filed as Staff Exhibit Nos. 1200, 3500, and 1201.

3. To the best of my knowledge, the pre-filed testimony and my Witness Qualifications Statement are true and accurate.

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.

SIGNED this 28<sup>th</sup> day of September, 2023.

*Brett Farrell*  
\_\_\_\_\_  
BRET FARRELL

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

3                                   **UE 416**

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

9                                   **DECLARATION OF JULIE JENT**

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

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

13           2.       On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
14                    above-captioned docket pre-filed as Staff Exhibit Nos. 1300 and 3600, and co-sponsored Joint  
15                    Testimony pre-filed as Staff Exhibit Nos. 2300 and 3800.

16                    To the best of my knowledge, the pre-filed testimony is 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 26<sup>th</sup> day of September, 2023.

21                                   *Julie Jent*  
22                                   \_\_\_\_\_  
23                                   JULIE JENT  
24  
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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 416**

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
Request for a General Rate Revision.

DECLARATION OF LUZ MONDRAGON

I, LUZ MONDRAGON, state the following, under penalty of perjury in the State of Oregon:

- 1. I am a Senior Financial Analyst employed in the Accounting and Finance Section of the Rates, Safety, and Utility Performance Program of the Oregon Public Utility Commission.
- 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony and a Witness Qualifications Statement for the above-captioned docket pre-filed as Staff Exhibit Nos. 1500 and 1501.
- 3. To the best of my knowledge, the pre-filed testimony and my Witness Qualifications Statement are true and accurate.

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.

SIGNED this 28<sup>th</sup> day of September, 2023.

*Luz Mondragon*  
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LUZ MONDRAGON

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

3 **UE 416**

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

9 **DECLARATION OF MITCHELL MOORE**

10 I, MITCHELL MOORE, state the following, under penalty of perjury in the State of Oregon:

11 1. I am a Senior Utility Analyst employed in the Accounting and Finance Section of  
12 the Rates, Safety, and Utility Performance Program of the Oregon Public Utility Commission.

13 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony and a  
14 Witness Qualifications Statement for the above-captioned docket pre-filed as Staff Exhibit Nos.  
15 1600 and 1601.

16 3. To the best of my knowledge, the pre-filed testimony and my Witness  
17 Qualifications Statement are true and accurate.

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

21 SIGNED this 28<sup>th</sup> day of September, 2023.

22 *Mitchell Moore*

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MITCHELL MOORE

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

3 **UE 416**

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

9 | DECLARATION OF MING PENG

10 I, MING PENG, state the following, under penalty of perjury in the State of Oregon:

11 1. I am a Senior Economist employed in the Accounting and Finance Section of the  
12 Rates, Safety, and Utility Performance Program of the Oregon Public Utility Commission.

13 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony and a  
14 Witness Qualifications Statement for the above-captioned docket pre-filed as Staff Exhibit Nos.  
15 1700 and 1701.

16 3. To the best of my knowledge, the pre-filed testimony and my Witness  
17 Qualifications Statement are true and accurate.

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

21 SIGNED this 28<sup>th</sup> day of September, 2023.

22 *Ming Peng*

23 \_\_\_\_\_  
24 MING PENG



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

3 **UE 416**

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

8 Request for a General Rate Revision.

9 **DECLARATION OF ROSE PILEGGI**

10 I, ROSE PILEGGI, state the following, under penalty of perjury in the State of Oregon:

11 1. I am a Senior Utility Analyst employed in the Energy Costs Section of the Rates,  
12 Safety, and Utility Performance Program of the Oregon Public Utility Commission.

13 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony and a  
14 Witness Qualifications Statement for the above-captioned docket pre-filed as Staff Exhibit Nos.  
15 1800 and 1801, and co-sponsored Joint Testimony pre-filed as Staff Exhibit Nos. 2300 and 3800.

16 3. To the best of my knowledge, the pre-filed testimony and my Witness  
17 Qualifications Statement are true and accurate.

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

21 SIGNED this 28<sup>th</sup> day of September, 2023.

22 *Rose Pileggi*  
23 ROSE PILEGGI



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 BRET STEVENS

8 I, BRET STEVENS state the following, under penalty of perjury in the State of Oregon:

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

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit Nos. 2000 and 3300, co-sponsored Joint  
13 Testimony pre-filed as Staff Exhibit Nos. 800, 2200, 3200, 3700, and 4100, and sponsored a  
14 Witness Qualifications Statement pre-filed as Staff Exhibit No. 2001.

15 3. To the best of my knowledge, the pre-filed testimony and my Witness  
16 Qualifications Statement are true and accurate.

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

20  
21 SIGNED this 28<sup>th</sup> day of September, 2023.

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24 BRET STEVENS, Ph.D.

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 ROBERT YOUNG

8  
9     Request for a General Rate Revision.

I, ROBERT YOUNG, state the following, under penalty of perjury in the State of Oregon:

10               1.     I am Managing Director of economists.com, a consulting firm located in Portland,  
11     Oregon.

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 No. 2100 and co-sponsored Joint Testimony  
14     pre-filed as Staff Exhibit Nos. 800 and 3200.

15               3.     My witness qualifications are pre-filed as Staff Exhibit 2101.

16               3.     To the best of my knowledge, the pre-filed testimony and the information  
17     regarding witness qualifications are true and accurate.

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

21                       SIGNED this 29<sup>th</sup> day of September, 2023.

22  
23   */s/ Robert Young*

24   \_\_\_\_\_  
25   ROBERT YOUNG  
26

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

3 **UE 416**

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

8 Request for a General Rate Revision.

DECLARATION OF MELISSA NOTTINGHAM

9 I, MELISSA NOTTINGHAM, state the following, under penalty of perjury in the State of  
10 Oregon:

11 1. I am the Consumer Services and Residential Service Protection Fund (RPSF)  
12 Manager of the Oregon Public Utility Commission.

13 2. On behalf of Staff of the Public Utility Commission, I co-sponsored testimony  
14 pre-filed as Staff Exhibit No. 2400 and 3900 and drafted a Witness Qualifications Statement for  
15 the above-captioned docket pre-filed as Staff Exhibit 2401.

16 3. To the best of my knowledge, the pre-filed testimony and my Witness  
17 Qualifications Statement are true and accurate.

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

21 SIGNED this 28<sup>th</sup> day of September, 2023.

22  
23 *Melissa Nottingham*  
24 \_\_\_\_\_  
25 MELISSA NOTTINGHAM  
26

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

3 **UE 416**

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

DECLARATION OF SCOTT SHEARER

9 I, SCOTT SHEARER, state the following, under penalty of perjury in the State of Oregon:

10 1. I am an analyst employed in the Rates and Telecommunications Services Section  
11 of the Rates, Safety and Utility Performance Program of the Oregon Public Utility Commission.

12 2. On behalf of Staff of the Public Utility Commission, I co-sponsored testimony  
13 pre-filed as Staff Exhibit No. 2400 and 3900 and drafted a Witness Qualifications Statement for  
14 the above-captioned docket pre-filed as Staff Exhibit 2402.

15 3. To the best of my knowledge, the pre-filed testimony and my Witness  
16 Qualifications 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 28<sup>th</sup> day of September, 2023.

21  
22 *Scott Shearer*

23 \_\_\_\_\_  
24 DECLARATION OF SCOTT SHEARER  
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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 LISA GORSUCH

8 Request for a General Rate Revision.

9 I, LISA GORSUCH, state the following, under penalty of perjury in the State of Oregon:

10 1. I am a manager employed in the Emergency Management Section of the Utility,  
11 Reliability and Security Division of the Oregon Public Utility Commission.

12 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony and a  
13 Witness Qualifications Statement for the above-captioned docket pre-filed as Staff Exhibit Nos.  
14 2500 and 2501.

15 3. To the best of my knowledge, the pre-filed testimony and my Witness  
16 Qualifications 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 28<sup>th</sup> day of September, 2023.

21  
22 *Lisa Gorsuch*  
23 \_\_\_\_\_  
24 LISA GORSUCH  
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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,

8 Request for a General Rate Revision.

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**DECLARATION OF SCOTT LUNDQUIST**

8 I, SCOTT LUNDQUIST, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a consultant employed by QSI Consulting, Inc.

10 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
11 above-captioned docket pre-filed as Staff Exhibit No. 2600.

12 3. My witness qualifications are pre-filed as Staff Exhibit No. 2601.

13 3. To the best of my knowledge, the pre-filed testimony and information regarding  
14 my witness qualifications are true and accurate.

15  
16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
18 penalty for perjury.

19 SIGNED this 29<sup>th</sup> day of September, 2023.

20  
21 */s/ Scott Lundquist*

22 \_\_\_\_\_  
23 SCOTT LUNDQUIST



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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 416**

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
Request for a General Rate Revision.

DECLARATION OF AUGUST ANKUM

I, AUGUST ANKUM, state the following, under penalty of perjury in the State of Oregon:

1. I am the Chief Economist and a founding partner of QSI Consulting, Inc.

2. On behalf of Staff of the Public Utility Commission, I co-sponsored Joint  
Opening Testimony with Warren Fischer for the above-captioned docket pre-filed as Staff  
Exhibit No. 2700 and sponsored Rebuttal Testimony pre-filed as Staff Exhibit No. 4000.

3. On behalf of Staff, I prepared information regarding my witness qualifications,  
which is pre-filed as Staff Exhibit No. 2701.

3. To the best of my knowledge, the pre-filed testimony and information regarding  
my witness qualifications are true and accurate.

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.

SIGNED this 28<sup>th</sup> day of September, 2023.

\_\_\_\_\_  
ANGUS ANKUM, Ph.D.

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 416**

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
Request for a General Rate Revision.

DECLARATION OF WARREN FISCHER

I, WARREN FISCHER, state the following, under penalty of perjury in the State of Oregon:

1. I am the Chief Financial Officer and a founding partner of QSI Consulting, Inc.
2. On behalf of Staff of the Public Utility Commission, I co-sponsored testimony for the above-captioned docket pre-filed as Staff Exhibit No. 2700.
3. My witness qualifications are pre-filed as Staff Exhibit No. 2702.
3. To the best of my knowledge, the pre-filed testimony and information regarding my witness qualifications are true and accurate.

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.

SIGNED this 28<sup>th</sup> day of September, 2023.

/s/ Warren Fischer

WARREN FISCHER