

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 435

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision

VERDE'S MOTION TO ADMIT PRE-
FILED TESTIMONY AND EXHIBITS

Verde moves for admission into the record in this proceeding the following pre-filed testimony and exhibits submitted on behalf of Verde:

Verde 100	Opening Testimony of Anahi Segovia Rodriguez
Verde 101	Witness Qualification Statement
Verde 102	Resume
Verde 103	PGE Response to AWEC Data Request No. 105
	PGE Response to CUB Data Request 053
	PGE Response to CUB Data Request 056
	PGE Response to CUB Data Request 059
	PGE Response to CUB Data Request 062
	PGE Response to OPUC Data Request 308
	PGE Response to OPUC Data Request 311
	PGE Response to OPUC Data Request 315
	PGE Response to OPUC Data Request 317

	PGE Response to OPUC Data Request 485
	PGE Response to OPUC Data Request 642
Verde 104	UG 490, Coalition/700, Colton/20
Verde 105	Portland General Electric Announces First Quarter 2024 Results
Verde 106	Appendix B to NW Natural LINA
Verde 200	Rebuttal Testimony of Anahi Segovia Rodriguez
Verde 201	UE 416 PGE 2024 Rate Review, 2024 Energy Burden Assessment
Verde 202	PGE Response to CUB Data Request 126
Verde 203	RO 12 Service Disconnections Quarterly Report Update
Verde 204	PGE Response to OPUC Data Request 642
Verde 205	PGE Response to CUB Data Request 132

The Declaration of Anahi Segovia Rodriguez attesting to the truth and accuracy of her testimony and exhibit filings filed in this proceeding is attached.

Respectfully submitted this 9th day of October, 2023

/s/ Tonia Moro
Tonia Moro
Counsel for Verde
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DECLARATION OF ANAHI SEGOVIA
RODRIGUEZ IN SUPPORT OF MOTION
TO ADMIT PRE-FILED TESTIMONY AND
EXHIBITS

I, Anahi Segovia Rodriguez, declare under penalty of perjury under the laws of the State of Oregon:

1. I am the Energy Justice Coordinator at Verde.
2. On behalf of Verde, I submitted/sponsored opening testimony and rebuttal testimony on the issues related to low-income residential customers, including Rate Relief, Affordability, Income Qualified Bill Discounts, Energy Burden, Arrearage Management, Disconnection, Energy Efficiency, Weatherization, and Return on Investment in Verde 100, and Verde 200. I also sponsored supporting exhibits Verde 101 - 106 and 200 - 205.
3. To the best of my knowledge and belief, the testimony I sponsored is true and accurate. If I were asked the same questions today, my answers would be the same.

DATED this 9th day of October 2024.

Respectfully submitted,

Signed by:


Anahi Segovia Rodriguez