

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

3 **UE 435**

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC  
6 COMPANY,

7 Request for a General Rate Revision.

STAFF MOTION TO ADMIT EXHIBITS

8 Staff of the Public Utility Commission of Oregon (Staff) moves the Administrative Law  
9 Judge (ALJ) for admission of the following exhibits in the record in the above-captioned docket:

Exhibit No.	Description
Staff 100	Opening Testimony of Russ Beitzel
Staff 101	Witness Qualifications Statement of Russ Beitzel
Staff 200	Opening Testimony of Michelle Scala
Staff 201	Witness Qualifications Statement of Michelle Scala
Staff 202	Exhibits in Support of Opening Testimony
Staff 300	Opening Testimony of Itayi Chipanera
Staff 301	Witness Qualifications Statement of Itayi Chipanera
Staff 302	Company Responses to Data Requests
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 Stage DCF Modeling
Staff 404	ROE – Three Stage DCF Modeling Results
Staff 405	ROE – Capital Asset Pricing Model (CAPM)
Staff 406	ROE – Gordon Growth Single Stage DCF
Staff 407	ROE – US BEA Historical GDP Growth
Staff 408	ROE – TIPS Implies Inflation
Staff 409	Value Line (VL) Electric Utilities
Staff 410	Financial News Investors are Seeing
Staff 500	Opening Testimony of Rose Pileggi
Staff 501	Witness Qualifications Statement of Rose Pileggi
Staff 600	Opening Testimony of Melissa Nottingham
Staff 601	Witness Qualifications Statement of Melissa Nottingham
Staff 602	Public Comments through July 1, 2024 and Public Comment Hearing on May 16, 2024
Staff 700	Opening Testimony of Ming Peng
Staff 701	Witness Qualifications Statement of Ming Peng
Staff 702	Exhibits in Support of Opening Testimony
Staff 800	Opening Testimony of Dustin Ball
Staff 801	Witness Qualifications Statement of Dustin Ball

1	Staff 802	DR Responses
	Staff 803	DR Responses – Confidential
2	Staff 804	Tables 6-9 in Support of Opening Testimony
	Staff 900	Opening Testimony of Bret Stevens
3	Staff 901	Witness Qualifications Statement of Bret Stevens
	Staff 902	Non-Confidential Discovery in Support of Opening Testimony
4	Staff 1000	Opening Testimony of Laurel Anderson
5	Staff 1001	Witness Qualifications Statement of Laurel Anderson
	Staff 1100	Opening Testimony of Nicola Peterson
6	Staff 1101	Witness Qualifications Statement of Nicola Peterson
	Staff 1200	Opening Testimony of Steph Yamada
7	Staff 1201	Witness Qualifications Statement of Steph Yamada
	Staff 1202	PGE’s Non-Confidential Data Request Responses
8	Staff 1203	Staff Workpapers
	Staff 1300	Opening Testimony of Luz Mondragon
9	Staff 1301	Witness Qualifications Statement of Luz Mondragon
	Staff 1302	Exhibits in Support of Opening Testimony
10	Staff 1303	Figure 9. PGE Vegetation Spend History
	Staff 1400	Opening Testimony of Julie Dyck
11	Staff 1401	Witness Qualifications Statement of Julie Dyck
	Staff 1402	PGE’s Non-Confidential Responses to Data Requests
12	Staff 1403	PGE’s Confidential Responses to Data Requests
	Staff 1404	PGE’s Highly Confidential Responses to Data Requests
13	Staff 1500	Opening Testimony of Mitch Moore
	Staff 1501	Witness Qualifications Statement of Mitch Moore
14	Staff 1600	Opening Testimony of Madison Bolton
	Staff 1601	Witness Qualifications Statement of Madison Bolton
15	Staff 1602	PGE Response to OPUC DR 353
16	Staff 1603	PGE Response to OPUC DR 367, Att. A. TLEA Cost/Benefit Analysis
	Staff 1604	Updated TLEA Cost/Benefit Analysis
17	Staff 1605	Schedule 38 Marginal Cost Compared to Revenues Workpaper
18	Staff 1700	Opening Testimony of Curtis Dlouhy
	Staff 1701	Witness Qualifications Statement of Curtis Dlouhy
19	Staff 1702	Non-Confidential Responses to Data Requests
	Staff 1703	Confidential Responses to Data Requests
20	Staff 1704	Highly Confidential Responses to Data Requests
	Staff 1705	Excerpts from the 2021 RFP Final Draft
21	Staff 1800	Opening Testimony of Scott Shearer
	Staff 1801	Witness Qualifications Statement of Scott Shearer
22	Staff 1900	Opening Testimony of Kate Ayres
	Staff 1901	Witness Qualifications Statement of Kate Ayres
23	Staff 1902	Exhibits in Support of Opening Testimony
24	Staff 2000	Opening Testimony of David Abraham
	Staff 2001	Witness Qualifications of David Abraham
25	Staff 2002	Exhibits in Support of Opening Testimony
	Staff 2100	Opening Testimony of Paul Rossow
26	Staff 2101	Witness Qualifications Statement of Paul Rossow
	Staff 2102	Confidential Meals and Entertainment Workpaper

1	Staff 2103	Non-Confidential Memberships Workpaper
	Staff 2200	Opening Testimony of Eric Shierman
2	Staff 2201	Witness Qualifications Statement of Eric Shierman
	Staff 2202	Analysis of UM 1811 Budget Violations
3	Staff 2203	Confidential Analysis of TE Operating Expenses
	Staff 2204	Confidential PGE's Fleet Decarbonization Study
4	Staff 2205	Confidential PGE's Decarbonization BCA
	Staff 2206	EV Total Cost of Ownership Analysis
5	Staff 2207	Analysis of New Line Extension Allowances
	Staff 2300	Rebuttal Testimony of Curtis Dlouhy and Michelle Scala
6	Staff 2301	Exhibits in Support of Opening Testimony
	Staff 2400	Rebuttal Testimony of Curtis Dlouhy
7	Staff 2401	Non-Confidential Responses to Data Requests
	Staff 2500	Rebuttal Testimony of Kate Ayres
8	Staff 2600	Rebuttal Testimony of Melissa Nottingham
	Staff 2601	Public Comments July 2, 2024 to August 27, 2024
9	Staff 2700	Rebuttal Testimony of Itayi Chipanera
	Staff 2800	Rebuttal Testimony of Matt Muldoon
10	Staff 2801	ROE – Three-Stage DCF: Peer Screen, Dividends, Earnings Per Share (EPS), and Hamada Equation
11	Staff 2802	ROE – Three-Stage DCF: Models X and Model Y
	Staff 2803	ROE – Three Stage DCF: Summary and Recommendations
12	Staff 2804	Capital Asset Pricing Model (CAPM)
13	Staff 2805	ROE: Gordon Growth – Single Stage DCF
	Staff 2806	ROE: BEA Historical GDP Growth
14	Staff 2807	ROE: TIPS Implied Inflation
	Staff 2808	ROE: Value line Electric Utilities
15	Staff 2809	ROE: Other GDP Growth Rates
	Staff 2810	ROE: Financial News that Investors in Electric Utilities are Seeing
16	Staff 2811	EEI 2023 Financial Review [July 18, 2024 Edition]
17	Staff 2812	Major Energy Rate Case Decisions January to June 2024 Regulatory Research Associates (RRA) [July 29, 2024 Edition]
18	Staff 2813	“Morningstar Mirage” WSJ: October 25, 2017
19	Staff 2814	U.S. SEC 8K 400M Shares Common Stock POR – Portland General Electric Company At the Market
20	Staff 2815	U.S. SEC Quarterly Report POR – Portland General Electric Company
21	Staff 2816	2024 Q2 Earnings Call Transcript POR – Portland General Electric Company
22	Staff 2817	2024 Q2 Earnings Call Slides POR – Portland General Electric Company
23	Staff 2818	Investor Presentation [June 17, 2024] POR – Portland General Electric Company
24	Staff 2900	Rebuttal Testimony of Rose Pileggi
25	Staff 2901	Exhibits in Support of Rebuttal Testimony
	Staff 3000	Rebuttal Testimony of Bret Stevens
26	Staff 3001	Non-Confidential Discovery in Support of Rebuttal Testimony

1	Staff 3100	Rebuttal Testimony of Madison Bolton
	Staff 3101	Staff Response to PGE DR 22
2	Staff 3200	Rebuttal Testimony of Eric Shierman
	Staff 3201	Electric Avenue AFUDC
3	Staff 3202	Capital Expenditures on Electric Island
	Staff 3203	PGE's Clarified Need for TE Database
4	Staff 3204	Operating Expenses for the TE Department and the EV Field Operations Department
5	Staff 3205	Training Costs for the EV Field Operations Department
	Staff 3206	Procurement of Motor Vehicles
6	Staff 3207	Adjustments to Line Extension Allowances in UE 394
	Staff 3208	Adjustments Incremental Line Extension Allowances in UE 416
7	Staff 3300	Rebuttal Testimony of Steph Yamada
8	Staff 3301	Confidential Exhibits in Support of Rebuttal Testimony
	Staff 3400	Rebuttal Testimony of Dustin Ball
9	Staff 3401	Exhibits in Support of Rebuttal Testimony
	Staff 3402	Confidential Exhibits in Support of Rebuttal Testimony
10	Staff 3500	Rebuttal Testimony of Luz Mondragon
	Staff 3501	Exhibits in Support of Rebuttal Testimony
11	Staff 3502	2023 OPUC Report No. E23-53R, Portland General Electric-Vegetation (Systemwide)
12	Staff 3600	Rebuttal Testimony of Julie Dyck
	Staff 3601	PGE's Non-Confidential and Redacted Data Request (DR) Responses in Support of Rebuttal Testimony
13	Staff 3700	Rebuttal Testimony of Laurel Anderson
14	Staff 3800	Rebuttal Testimony of Nicola Peterson
	Staff 3900	Rebuttal Testimony of Mitch Moore
15	Staff 3901	Exhibits in Support of Rebuttal Testimony
	Staff 4000	Rebuttal Testimony of David Abraham
16	Staff 4100	Rebuttal Testimony of Paul Rossow
	Staff 4101	Exhibits in Support of Rebuttal Testimony
17	Staff 4200	Staff Response to PGE DR 30

18           The testimony of Staff and Staff Witness Qualifications Statements are supported by the  
19 declarations of Staff witnesses attached to this motion, except for the testimony and statements

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1 of Staff witnesses Kate Ayre and Dustin Ball. Both witnesses are out of the office. Their  
2 declarations will be filed upon their return.

3 DATED this 9<sup>th</sup> day of October 2024.

4 Respectfully submitted,

5 ELLEN F. ROSENBLUM  
6 Attorney General

7 */s/ Stephanie Andrus*

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Stephanie Andrus, OSB No. 925123  
9 Sr. Assistant Attorney General  
10 Of Attorneys for Staff of the Public Utility  
11 Commission of Oregon  
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1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UE 435**

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

DECLARATION OF RUSS BEITZEL

8 I, RUSS BEITZEL, state the following, under penalty of perjury in the State of Oregon:

9 1. I am employed as a Program Manager in the Rates and Telecommunications  
10 Section of the Water, Telecom, Safety, and Consumers Program of the Oregon Public Utility  
11 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 No. 100 and sponsored a Witness  
14 Qualifications Statement pre-filed as Staff Exhibit No. 101.

15 3. To the best of my knowledge, my pre-filed testimony and Witness Qualifications  
16 Statement are true and accurate, other than references to the Section and Program in which I  
17 work, which have been updated to those listed above since my testimony was filed in this case.

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  
21 penalty for perjury.

22 SIGNED this 9<sup>th</sup> day of October, 2024.

23  
24 Russell E Beitzel III  
25 RUSS BEITZEL  
26

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

3 **UE 435**

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

DECLARATION OF MICHELLE SCALA

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

9 1. I am employed as the Manager of the Regulatory Strategy Section of the Energy  
10 Rates and Regulatory Strategy 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 No. 200, co-sponsored testimony pre-filed as  
13 Staff Exhibit No. 2300, and sponsored a Witness Qualifications Statement pre-filed as Staff  
14 Exhibit No. 201.

15 3. To the best of my knowledge, my pre-filed testimony and Witness Qualifications  
16 Statement are true and accurate, other than references in Exhibit Nos. 200 and 201 to my job title  
17 and the Section and Program in which I work, which have changed since testimony was filed.

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  
21 penalty for perjury.

22 SIGNED this 9<sup>th</sup> day of October, 2024.

23  
24 Michelle Scala /s/  
25 MICHELLE SCALA  
26

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 435**

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

DECLARATION OF ITAYI CHIPANERA

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

1. I am employed as a Utility Analyst in the Accounting and Finance Section of the Energy Rates and Regulatory Strategy Program of the Oregon Public Utility Commission.

2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the above-captioned docket pre-filed as Staff Exhibit Nos. 300 and 2700 and sponsored a Witness Qualifications Statement pre-filed as Staff Exhibit No. 301.

3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications Statement are true and accurate other than references in Exhibit Nos. 300 and 301 to the name of the program within which I work at the OPUC, which has been modified to what is stated above.

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 9<sup>th</sup> day of October, 2024.

  
ITAYI CHIPANERA



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

3 **UE 435**

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

DECLARATION OF MATT MULDOON

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

9 1. I am employed as a Program Manager in the Accounting and Finance Section of  
10 the Energy Rates and Regulatory Strategy Program of the Oregon Public Utility Commission.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony pre-  
12 filed as Staff Exhibit Nos. 400 and 2800 and sponsored a Witness Qualifications Statement pre-  
13 filed as Staff Exhibit No. 401.

14 3. To the best of my knowledge, my statements in this pre-filed testimony are true  
15 and accurate, other than the references in Staff Exhibit Nos. 400 and 401 to the name of Utility  
16 Program in which I work at the OPUC, which has been modified to that listed above.

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  
20 penalty for perjury.

21 SIGNED this 9<sup>th</sup> day of October, 2024.

22  
23 *Matt MULDOON*

24 MATT MULDOON

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

3 **UE. 435**

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

DECLARATION OF ROSE PILEGGI

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

- 9 1. I am employed as a Senior Utility Analyst in the Energy Costs Section of the  
10 Energy Rates and Regulatory Strategy 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 2900 and sponsored a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 501.
- 14 3. To the best of my knowledge, the pre-filed testimony listed and my Witness  
15 Qualifications Statement listed above are true and accurate, other than references in Exhibit Nos.  
16 500 and 501 to the Program in which I work in the OPUC, which was modified after the filing of  
17 Staff testimony.

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  
21 penalty for perjury.

22 SIGNED this 9<sup>th</sup> day of October 2024.

23  
24 *Rose Pileggi*  
25 \_\_\_\_\_  
ROSE PILEGGI

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

3 **UE 435**

4 In the Matter of  
5 NORTHWEST NATURAL GAS  
6 COMPANY, dba, NW NATURAL,  
7 Request for a General Rate Revision.

DECLARATION OF MELISSA NOTTINGHAM

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

10 1. I am employed as the Compliance and Regulatory Program Manager of the  
11 Consumers Program of the Oregon 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. 600 and 2600, and a Witness  
14 Qualifications Statement pre-filed as Staff Exhibit No. 601.

15 3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
16 Statement are true and accurate, except for the references to the Utility Program in which I work,  
17 which has been modified since Staff Exhibits 600 and 601 were filed.

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 9<sup>th</sup> day of October, 2024.

22 *Melissa Nottingham*  
23 MELISSA NOTTINGHAM

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

3 **UE 435**

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

DECLARATION OF MING PENG

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

- 9 1. I am employed as a Senior Economist in the Accounting and Finance Program of  
10 the Energy Rates and Regulatory Strategy Section 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 No. 700 and sponsored a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 701.  
14 3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
15 Statement are true and accurate other than references to the name of the program and section in  
16 which I work within the OPUC, which have been modified to what is stated above.

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  
20 penalty for perjury.

21 SIGNED this 9<sup>th</sup> day of October, 2024.

22  
23 *Ming Peng*

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

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 435**

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

DECLARATION OF BRET STEVENS, Ph.D.

I, BRET STEVENS, Ph.D., state the following, under penalty of perjury in the State of Oregon:

- 1. I am employed as a Senior Economist in the Regulatory Strategy Section of the Energy Rates and Regulatory Strategy Program of the Oregon Public Utility Commission.
- 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the above-captioned docket pre-filed as Staff Exhibit Nos. 900 and 3000, and sponsored a Witness Qualifications Statement pre-filed as Staff Exhibit No. 901.
- 3. To the best of my knowledge, my pre-filed testimony and Witness Qualifications Statement are true and accurate, other than references in Exhibit Nos. 900 and 901 to the Section and Program in which I work, which have changed since those exhibits were filed.

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 9<sup>th</sup> day of October, 2024.



\_\_\_\_\_  
BRET STEVENS, Ph.D.

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

3                                   **UE 435**

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

DECLARATION OF LAUREL ANDERSON

8 I, LAUREL ANDERSON, state the following, under penalty of perjury in the State of Oregon:

9           1.       I am employed as a Senior Telecommunications Analyst in the Rates and  
10 Telecommunications Section of the Water, Telecom, Safety, and Consumers Program of the  
11 Oregon 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. 1000 and 3700 and sponsored a Witness  
14 Qualifications Statement pre-filed as Staff Exhibit No. 1001.

15           3.       To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
16 Statement listed above are true and accurate, except for the references in Exhibit Nos. 1000 and  
17 1001 to the Utility Section and Program in which I work, which have been modified to those  
18 stated above.

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  
21 penalty for perjury.

22           SIGNED this 9<sup>th</sup> day of October, 2024.

*Laurel ANDERSON*

\_\_\_\_\_  
LAUREL ANDERSON

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

3 **UE 435**

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

DECLARATION OF NICOLA PETERSON

8 I, NICOLA PETERSON, state the following, under penalty of perjury in the State of Oregon:

9 1. I am employed as a Senior Telecommunications Analyst in the Water, Telecom,  
10 Safety and Consumers Division of 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. 1100 and 3800, and a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 1101.

14 3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
15 Statement are true and accurate, except for the references to the Utility Section and Program in  
16 which I work in Staff Exhibit No. 1100 and 1101, which have been modified to those stated  
17 above.

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 SIGNED this 9<sup>th</sup> day of October, 2024.

22 *Nicola PETERSON*

23 \_\_\_\_\_  
NICOLA PETERSON

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

3   **UE 435**

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

DECLARATION OF STEPH YAMADA

8     I, STEPH YAMADA, state the following, under penalty of perjury in the State of Oregon:

9             1.         I am employed as a Senior Utility Analyst in the Rates and Telecommunications  
10            Section of the Water, Telecom, Safety, and Consumers Program of the Oregon Public Utility  
11            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. 1200 and 3300 and sponsored a Witness  
14            Qualifications Statement pre-filed as Staff Exhibit No. 1201.

15            3.         To the best of my knowledge, my pre-filed testimony and Witness Qualifications  
16            Statement are true and accurate, other than references to the Section and Program in which I  
17            work, which have been updated to those listed above since Staff Exhibit Nos. 1200 and 1201  
18            were filed.

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  
21     penalty for perjury.

22                         SIGNED this 9<sup>th</sup> day of October, 2024.

23  
24   

25   \_\_\_\_\_  
26   STEPH YAMADA



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

3 **UE 435**

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

DECLARATION OF LUZ MONDRAGON

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

9 1. I am employed as a Senior Financial Analyst in the Accounting and Finance  
10 Program of the Energy Rates and Regulatory Strategy Section of the Oregon Public Utility  
11 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. 1300 and 3500 and sponsored a Witness  
14 Qualifications Statement pre-filed as Staff Exhibit No. 1301.

15 3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
16 Statement are true and accurate other than references in Exhibit Nos. 1300 and 1301 to the  
17 names of the utility program and section in which I work, which have been modified since these  
18 exhibits were filed.

19  
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 9<sup>th</sup> day of October, 2024.

24  
25   
26 LUZ MONDRAGON

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

3 **UE 435**

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

DECLARATION OF JULIE DYCK

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

- 9 1. I am employed as a Senior Utility Analyst in the Energy Costs Section of the  
10 Energy Rates and Regulatory Strategy 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. 1400 and 3600 and sponsored a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 1401.
- 14 3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
15 Statement listed above, are true and accurate, other than references in Exhibit Nos. 1400 and  
16 1401 to the Program in which I work in the OPUC, which was modified after the filing of these  
17 exhibits.

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  
21 penalty for perjury.

22 SIGNED this 9<sup>th</sup> day of October, 2024.

23  
24   
25 \_\_\_\_\_  
26 JULIE DYCK

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

3 **UE 435**

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

DECLARATION OF MITCHELL MOORE

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

9 1. I am employed as a Senior Utility Analyst in the Accounting and Finance Section  
10 of the Energy Rates and Regulatory Strategy 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. 1500 and 3900 and sponsored a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 1501 and Staff Exhibit No. 1502.

14 3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
15 Statement are true and accurate other than references in Exhibit Nos. 1500 and 1501 to where I  
16 work within the OPUC, which has been modified to what is stated above.

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  
20 penalty for perjury.

21 SIGNED this 9<sup>th</sup> day of October, 2024.

22  
23 *Mitch MOORE*  
24 \_\_\_\_\_  
25 MITCHELL MOORE  
26

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

3                                   **UE 435**

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

DECLARATION OF MADISON BOLTON

8 Request for a General Rate Revision.

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

10           1.       I am a Senior Energy and Policy Analyst employed in the Policy and Economic  
11 Analysis Section of the Energy Rates and Regulatory Strategy Division of the Public Utility  
12 Commission.

13           2.       On behalf of Staff of the Public Utility Commission, I sponsored testimony pre-  
14 filed as Staff Exhibit Nos. 1600 and 3100 and a Witness Qualifications Statement pre-filed as  
15 Staff Exhibit No.1601.

16           3.       To the best of my knowledge, the pre-filed testimony and my Witness  
17 Qualifications Statement are true and accurate, other than the references in Exhibit Nos. 1600  
18 and 1601 to name of the section and division in which I work at the OPUC, which has changed  
19 since the exhibits were pre-filed.

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 9<sup>th</sup> day of October, 2024.

24                                     
25                                   \_\_\_\_\_  
26                                   MADISON BOLTON

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

3 **UE 435**

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

DECLARATION OF CURTIS DLOUHY

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

10 1. I am employed as the Program Manager of the Policy and Economic Analysis  
11 Section of the Energy Rates and Regulatory Strategy Program of the Oregon Public Utility  
12 Commission.

13 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony pre-  
14 filed as Staff Exhibit Nos. 1700 and 2400, co-sponsored Joint Testimony pre-filed Staff Exhibit  
15 No. 2300, and sponsored a Witness Qualifications Statement pre-filed as Staff Exhibit No. 1701.

16 3. To the best of my knowledge, my pre-filed testimony and Witness Qualifications  
17 Statement are true and accurate, other than references in Staff Exhibit Nos. 1700 and 1701 to my  
18 job title and the section and program in which I work, which have changed since testimony was  
19 filed.

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

24 SIGNED this 9<sup>th</sup> day of October, 2024.

25 

26 CURTIS DLOUHY, Ph.D.

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

3   **UE 435**

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

9   DECLARATION OF SCOTT SHEARER

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

11             1.       I am an analyst employed in the Rates and Telecommunications Services Program  
12 of the Water, Telecom, Safety, and Consumers Section of the Oregon Public Utility  
13 Commission.

14             2.       On behalf of Staff of the Public Utility Commission, I sponsored testimony pre-  
15 filed as Staff Exhibit No. 1800 and drafted a Witness Qualifications Statement for the above-  
16 captioned docket pre-filed as Staff Exhibit 1801.

17             3.       To the best of my knowledge, the pre-filed testimony and my Witness  
18 Qualifications Statement are true and accurate other than the references to the names of the  
19 section and program in which I work at the OPUC, which have changed since filing the  
20 testimony.

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

23                                 SIGNED this 9<sup>th</sup> day of October, 2024.

24   *Scott Shearer*

25   \_\_\_\_\_  
26   DECLARATION OF SCOTT SHEARER

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

3 **UE 435**

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

DECLARATION OF DAVID ABRAHAM

8 I, DAVID ABRAHAM, state the following, under penalty of perjury in the State of Oregon:

9 1. I am employed as a Senior Economist in the Energy Costs Section of the Energy  
10 Rates and Regulatory Strategy 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. 2000 and 4000 and sponsored a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 2001.

14 3. To the best of my knowledge, the pre-filed testimony and my Witness  
15 Qualifications Statement are true and accurate, other than references to where I work in the  
16 OPUC, which has been modified since Staff Exhibit Nos. 2000 and 2001 was filed.

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  
20 penalty for perjury.

21 SIGNED this 9<sup>th</sup> day of October, 2024.

22  
23 *David Abraham*

24 

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DAVID ABRAHAM

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

3 **UE 435**

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

DECLARATION OF PAUL ROSSOW

8 I, PAUL ROSSOW, state the following, under penalty of perjury in the State of Oregon:

- 9 1. I am employed as a Utility Analyst in the Accounting and Finance Section of the  
10 Energy Rates and Regulatory Strategy 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. 2100 and 4100 and sponsored a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 2101.  
14 3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
15 Statement are true and accurate other than references in Exhibit Nos. 2100 and 2101 to where I  
16 work within the OPUC, which has been modified to what is stated above.

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 9<sup>th</sup> day of October, 2024.

21  
22 *Paul Rossow*

23 \_\_\_\_\_  
24 PAUL ROSSOW  
25  
26



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

3 **UE 435**

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

DECLARATION OF ERIC SHIERMAN

8 I, ERIC SHIERMAN, state the following, under penalty of perjury in the State of Oregon:

9 1. I am employed as a Utility Analyst in the Resource and Programs Development  
10 Section of the Energy Resources and Planning Division of 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. 2200 and 3200, and a Witness  
13 Qualifications Statement pre-filed as Staff Exhibit No. 2201.

14 3. To the best of my knowledge, the pre-filed testimony and Witness Qualifications  
15 Statement are true and accurate, except for the references where I changed my position in  
16 Staff/3200 when agreeing with points made by Portland General Electric in the Company's  
17 Reply Testimony.

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 SIGNED this 9<sup>th</sup> day of October, 2024.  
22

23 *Eric Shierman*

24 ERIC SHIERMAN  
25  
26