#### **OF OREGON**

#### **UM 1610**

In the Matter of	) ) MOTION TO ADMIT PRE-FILED
PUBLIC UTILITY COMMISSION OF OREGON	<ul> <li>) TESTIMONY AND EXHIBITS ON BEHALF</li> <li>) OF THE RENEWABLE ENERGY</li> <li>) COALITION</li> </ul>
Investigation Into Qualifying Facility Contracting and Pricing	) ) )

Pursuant to the Administrative Law Judge's Ruling, dated May 30, 2013, the Renewable Energy Coalition ("REC") hereby moves that the following pre-filed testimony and exhibits submitted on behalf of REC be admitted to the record.

Testimony & Exhibits	Witness
Coalition/100-102	John Lowe (REC)
Coalition/200-201	Donald Schoenbeck (REC)
Coalition/300-302	Jeremiah Camarata (REC)
Cross-Examination Exhibits	Witness
REC/400	MacFarlane-Mortan (PGE)
REC/401	MacFarlane-Mortan (PGE)
REC/402	MacFarlane-Mortan (PGE)
REC/403	Dickman (PacifiCorp)
REC/404	Dickman (PacifiCorp)
REC/405	Dickman (PacifiCorp)
REC/406	Dickman (PacifiCorp)
REC/407	Dickman (PacifiCorp)

The affidavits of John Lowe, Donald Schoenbeck, Edson Pugh and Jeremiah Camarata attesting to the truth and accuracy of the testimony and exhibits are attached.

PAGE 1 – REC MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS

#### Dated this 4th day of June, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

Irion A. Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

ias@dvclaw.com

Of Attorneys for the Renewable

**Energy Coalition** 

#### **OF OREGON**

#### **UM 1610**

In the Matter of	)	
	)	AFFIDAVIT OF
PUBLIC UTILITY COMMISSION OF	)	
OREGON	)	JOHN LOWE
	)	
Investigation Into Qualifying Facility	)	
Contracting and Pricing	)	

I, John Lowe, being first duly sworn on oath, depose and say:

- 1. My name is John Lowe. I am the director of the Renewable Energy Coalition (the "Coalition"). My business address is 12040 SW Tremont Street, Portland, Oregon 97225.
- 2. I sponsored pre-filed testimony and exhibits on behalf of the Coalition in Oregon Public Utility Commission Docket No. UM 1610. Specifically, my pre-filed Response Testimony and exhibits, Coalition/100-102 were filed on March 18, 2013.
- 3. My testimony and exhibits that were previously filed are true and accurate, and no corrections need to be made. If I were asked the same questions today, my answers would be the same.

OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 29 day of May, 2013, at Perhand, Oregon.

John Lowe

SUBSCRIBED AND SWORN to before me this 29 day of May, 2013.

NOTARY PUBLIC FOR OREGON

My Commission Expires: 1/15/17

OFFICIAL SEAL

GARETH R HOOD

NOTARY PUBLIC - OREGON

COMMISSION NO. 474816

MY COMMISSION EXPIRES JANUARY 15, 2017

#### **OF OREGON**

#### **UM 1610**

In the Matter of	)	
	)	AFFIDAVIT OF
PUBLIC UTILITY COMMISSION OF	)	
OREGON	)	DONALD SCHOENBECK
	)	
Investigation Into Qualifying Facility	)	
Contracting and Pricing	)	

- I, Donald Schoenbeck, being first duly sworn on oath, depose and say:
- 1. My name is Donald Schoenbeck. I am employed by the firm of Regulatory and Cogeneration Services, regulatory and economic consultants. I am appearing in this proceeding as a witness for the Renewable Energy Coalition (the "Coalition"). My business address is 900 Washington Street, Suite 780, Vancouver, WA 98660.
- 2. I sponsored pre-filed testimony and exhibits on behalf of the Coalition in Oregon Public Utility Commission Docket No. UM 1610. Specifically, my pre-filed Response Testimony and exhibits, Coalition/200-201, were filed on March 18, 2013.
- 3. My testimony and exhibits that were previously filed are true and accurate, and no corrections need to be made. If I were asked the same questions today, my answers would be the same.

OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS And that I understand it is made as evidence and is subject to penalty for perjury.

Donald Schoenbeck

SUBSCRIBED AND SWORN to before me this Adday of May, 2013.

GENEVIEVE A SCHMIDT NOTARY PUBLIC

Sonald/ Schoenberk

STATE OF WASHINGTON COMMISSION EXPIRES SEPTEMBER 10, 2016 OTÁRY PÚBLIC FOR WASHINGTON

My Commission Expires: 9/0-16

#### OF OREGON

#### **UM 1610**

In the Matter of	)	AFFIDAVIT OF
PUBLIC UTILITY COMMISSION OF OREGON	)	EDSON PUGH
Investigation Into Qualifying Facility Contracting and Pricing	)	

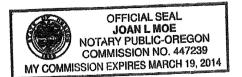
- I, Edson Pugh, being first duly sworn on oath, depose and say:
- 1. My name is Edson Pugh. I am the General Manager at Deschutes Valley Water District, which is a member of the Renewable Energy Coalition (the "Coalition"). My business address is Deschutes Valley Water District, 881 S.W. Culver Highway, Madras, OR 97741.
- I sponsored pre-filed testimony and exhibits on behalf of the Coalition in Oregon
   Public Utility Commission Docket No. UM 1610. Specifically, my pre-filed Response
   Testimony and exhibits, Coalition/300-302 were filed on March 18, 2013.
- 3. My testimony and exhibits that were previously filed are true and accurate, and no corrections need to be made. If I were asked the same questions 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 AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 24th day of May, 2013, at Madras, Oregon.

Edson Pugh

SUBSCRIBED AND SWORN to before me this 24 day of May, 2013.



Edom Pugh

NOTARY PUBLIC FOR OREGON

My Commission Expires: 3-19-14

DAVISON VAN CLEVE, PC
MAY 3 0 2013

### BEFORE THE PUBLIC UTILITY COMMISSION

#### OF OREGON

UM 1610

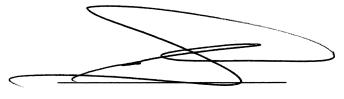
In the Matter of	١	
III LIIC WALG OI	Ś	AFFIDAVIT OF
PUBLIC UTILITY COMMISSION OF	Ś	7
OREGON	í	JEREMIAH CAMARATA
3.1233.1	)	
Investigation Into Qualifying Facility	)	
Contracting and Pricing	)	•

I. Jeremiah Camarata, being first duly sworn on oath, depose and say:

- 1. My name is Jeremiah Camarata. I am the District Manager at Farmers Irrigation District ("FID"), which is a member of the Renewable Energy Coalition (the "Coalition"). My business address is Farmers Irrigation District, 1985 Country Club Road, Hood River, OR 97031.
- I sponsored pre-filed testimony and exhibits on behalf of the Coalition in
   Oregon Public Utility Commission Docket No. UM 1610. Specifically, my pre-filed Response
   Testimony and exhibits, Coalition/300-302 were filed on March 18, 2013.
- 3. My testimony and exhibits that were previously filed are true and accurate, and no corrections need to be made. If I were asked the same questions 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 AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 29 day of May, 2013, at How Residual Pregion.



Jeremiah Camarata

SUBSCRIBED AND SWORN to before me this 29 day of May, 2013.

OFFICIAL SEAL
JUNE M BROCK
NOTARY PUBLIC-OREGON
COMMISSION NO. 444587
MY COMMISSION EXPIRES DECEMBER 26, 2013

NOTARY PUBLIC FOR OREGON

My Commission Expires: 12-26-13

## Davison Van Cleve PC

#### Attorneys at Law

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June 4, 2013

#### Via Electronic and U.S. Mail

Public Utility Commission of Oregon Attn: Filing Center 550 Capitol St. NE #215 P.O. Box 2148 Salem OR 97308-2148

Re: In the Matter of Public Utility Commission of Oregon Investigation Into

Qualifying Facility Contracting and Pricing

Docket No. UM 1610

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Renewable Energy Coalition's Motion to Admit Pre-filed Testimony and Exhibits.

Thank you for your assistance, and please do not hesitate to contact our office if you have any questions.

Sincerely,

/s/ Jesse Gorsuch
Jesse Gorsuch

Enclosures

cc: Service List

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing documents upon the parties on the service list via electronic mail only, as all parties have waived paper service.

Dated at Portland, Oregon, this 4th day of June, 2013.

Sincerely,

/s/ Jesse Gorsuch
Jesse Gorsuch

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