



Oregon

Tina Kotek, Governor

Public Utility Commission

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October 9, 2024

Via Electronic Filing

OREGON PUBLIC UTILITY COMMISSION ATTENTION: FILING CENTER
PO BOX 1088
SALEM OR 97308-1088

RE: Docket No. UE 435 – In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision.

Attached for filing is Staff's Redacted Exhibit 4200, Staff's Cross-Examination Statement and Supplemental Exhibit List.

Highly Confidential exhibit included with this filing is:

Highly Confidential exhibit:
Exh 4200 HCONF

/s/ Mark Brown

Mark Brown
Oregon Public Utility Commission
(971) 375-5080
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CERTIFICATE OF SERVICE

UE 435

I certify that this day I served the foregoing document upon all the following parties or attorneys of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid or by electronic mail pursuant to OAR 860-001-0180 (which may include a link to a secure shared file service).

Dated this 9th day of October, 2024, at Salem, Oregon.



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UE 435 – Service List

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CASE: UE 435
WITNESS: STAFF

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 4200

**REDACTED
Staff's
Cross-Examination Statement
and
Supplemental Exhibit List**

October 9, 2024

Date: October 8, 2024

TO:
Jaki Ferchland
Portland General Electric Company
Manager, Rates & Regulatory Affairs
121 SW Salmon Street, 3WTC-0306
Portland, OR 97204

FROM: Curtis Dlouhy, Staff

OREGON PUBLIC UTILITY COMMISSION
Docket No. UE 435 – PGE Data Request No. 30

PGE Data Request No. 30:

See Staff/2400, Dlouhy/13. Please provide workpapers with formulae intact showing the calculations relied upon for Staff's proposed adjustments for Constable and Seaside. Specifically, show where AFUDC and owners' costs were recognized in costs for the RFP bid values relied upon by Staff for its adjustment.

OPUC Data Response No. 30:

Staff assumes that the Company intended to refer to Staff/2400, Dlouhy/13.

Please refer to Staff's testimony in Staff/1700, Dlouhy/20 on lines 12-18 and Staff/1700, Dlouhy/28 at lines 17-19.

Upon review following the submission of Staff's rebuttal testimony, Staff realized that it crafted its adjustment based on the incorrect cell of the Company's workpapers that omitted expected AFUDC and owners' costs. Staff has updated its adjustment to include AFUDC and owners' costs **[BEGIN HIGHLY CONFIDENTIAL]**

[REDACTED]
[END HIGHLY CONFIDENTIAL] Staff's updated adjustments to the Constable and Seaside battery projects are as follows:

- \$10.1 million reduction to Constable's rate base
- \$35.1 million reduction to Seaside's rate base

The calculation supporting these adjustments can be found in the workpaper titled "HIGH CONF DR 30 Attachment."

Page 2 is Highly Confidential