

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 180/UE 181/UE 184**

<p>In the Matters of</p> <p>PORTLAND GENERAL ELECTRIC COMPANY</p> <p>Request for a General Rate Revision (UE 180)</p> <p>Annual Adjustments to Schedule 125 (2007 RVM Filings) (UE 181)</p> <p>Request for General Rate Revision relating to the Port Westward Plant (UE 184)</p>	<p>MOTION TO ADMIT EXHIBITS</p>
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Staff requests that administrative law judge admit the exhibits listed below into the record in the above-captioned case. Staff exhibits 100-1801 were previously filed with the Commission and are staff testimony and staff exhibits in support of testimony. Affidavits attesting to the truthfulness of the staff's testimony and exhibits are attached to this motion.¹

Exhibits 1900-1923, which are responses to staff data requests, are being submitted to the Commission today under separate cover.

Exhibit #	Exhibit
Staff 100	Direct testimony of Maury Galbraith
Staff 101	Witness qualification statement (Galbraith)
Staff 102	Exhibits in support of direct testimony (Galbraith)
Staff 200	Direct testimony of Bill Wordley
Staff 201	Witness qualification statement (Wordley)
Staff 202	Exhibits in support of direct testimony (Wordley)
Staff 300	Direct testimony of Ed Durrenberger

¹ The affidavit one staff witness, Judy Johnson, will be filed upon her return from vacation.

1	Staff 301	Witness qualification statement (Durrenberger)
2	Staff 302	Exhibits in support of direct testimony (Durrenberger)
3	Staff 400	Direct testimony of Carla Owings
4	Staff 401	Witness qualification statement (Owings)
5	Staff 402	Exhibits in support of direct testimony (Owings)
6	Staff 500	Direct testimony of Judy Johnson
7	Staff 501	Witness qualification statement (Johnson)
8	Staff 502	Exhibits in support of direct testimony (Johnson)
9	Staff 600	Direct testimony of Lisa Schwartz
10	Staff 601	Witness qualification statement (Schwartz)
11	Staff 602	Exhibits in support of direct testimony (Schwartz)
12	Staff 700	Direct testimony of JR Gonzalez
13	Staff 701	Witness qualification statement
14	Staff 702	Exhibits in support of direct testimony (Gonzalez)
15	Staff 800	Direct testimony of Maury Galbraith
16	Staff 900	Direct testimony of Steve W. Chriss
17	Staff 901	Witness qualification statement
18	Staff 1000	Direct testimony of Thomas D. Morgan
19	Staff 1001	Witness qualification statement (Morgan)
20	Staff 1002	Exhibits in support of direct testimony (Morgan)
21	Staff 1003	Exhibits in support of direct testimony (Morgan)
22	Staff 1100	Direct testimony of Bryan Conway
23	Staff 1101	Witness qualification statement
24	Staff 1102	Exhibits in support of direct testimony (Conway)
25	Staff 1200	Direct testimony of Bryan Conway
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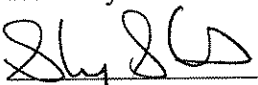
1	Staff 1201	Exhibits in support of direct testimony (Conway)
2	Staff 1202	Exhibits in support of direct testimony (Conway)
3	Staff 1300	Surrebuttal testimony of Bryan Conway
4	Staff 1301	Exhibits in support of surrebuttal testimony (Conway)
5	Staff 1400	Surrebuttal testimony of Thomas D. Morgan
6	Staff 1401	Exhibits in support of surrebuttal testimony (Morgan)
7	Staff 1402	Exhibits in support of surrebuttal testimony (Morgan)
8	Staff 1403	Confidential exhibits in support of surrebuttal testimony (Morgan)
9	Staff 1500	Surrebuttal testimony of Maury Galbraith
10	Staff 1501	Exhibits in support of surrebuttal testimony (Galbraith)
11	Staff 1502	Exhibits in support of surrebuttal testimony (Galbraith)
12	Staff 1600	Surrebuttal testimony of Bill Wordley
13	Staff 1601	Confidential exhibits in support of surrebuttal testimony (Wordley)
14	Staff 1602	Exhibits in support of surrebuttal testimony (Wordley)
15	Staff 1603	Exhibits in support of surrebuttal testimony (Wordley)
16	Staff 1700	Surrebuttal testimony of Lisa Schwartz
17	Staff 1800	Surrebuttal testimony of Carla Owings
18	Staff 1801	Exhibits in support of surrebuttal testimony (Owings)
19	Staff 1900	City of Portland response to staff data request no. 1
20	Staff 1901	PGE response to staff data request no. 130
21	Staff 1902	PGE response to staff data request no. 530
22	Staff 1903	PGE response to staff data request no. 534
23	Staff 1904	PGE response to staff data request no. 622
24	Staff 1905	PGE response to staff data request no. 623
25	Staff 1906	PGE response to staff data request no. 624
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1	Staff 1907	PGE response to staff data request no. 625
2	Staff 1908	PGE response to staff data request no. 626
3	Staff 1909	PGE response to staff data request no. 628
4	Staff 1910	PGE response to staff data request no. 630
5	Staff 1911	PGE response to staff data request no. 638
6	Staff 1912	PGE response to staff data request no. 639
7	Staff 1913	PGE response to staff data request no. 640
8	Staff 1914	PGE response to staff data request no. 643
9	Staff 1915	PGE response to staff data request no. 644
10	Staff 1916	PGE response to staff data request no. 647
11	Staff 1917	PGE response to staff data request no. 648
12	Staff 1918	PGE response to staff data request no. 657
13	Staff 1919	PGE response to staff data request no. 658
14	Staff 1920	PGE response to staff data request no. 659
15	Staff 1921	PGE response to staff data request no. 660
16	Staff 1922	PGE response to staff data request no. 662
17	Staff 1923	PGE response to staff data request no. 663

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DATED this 2ND day of November 2006.

Respectfully submitted,

HARDY MYERS
Attorney General


Stephanie S. Andrus, #92512
Assistant Attorney General
Of Attorneys for staff of the Public Utility
Commission of Oregon

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UE 180/UE 181/UE 184**

4 In the Matters of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY

7 Request for a General Rate Revision (UE 180)

8 Annual Adjustments to Schedule 125
(2007 RVM Filing) (UE 181)

9 Request for General Rate Revision relating to the
10 Port Westward Plant (UE 184)

AFFIDAVIT OF MAURY GALBRAITH

11 State of Oregon)

12 County of Marion) ss.

13 I, Maury Galbraith, hereby depose and say:

14 1. I am employed by the Public Utility Commission of Oregon ("the Commission") as a
15 senior economic analyst in the Electric and Natural Gas Division.

16 2. In the course of my employment, I sponsored testimony in the above-captioned dockets
17 on behalf of Commission staff. My testimony was pre-filed as Staff Exhibits 100, 800 and 1500,
18 accompanied by supporting exhibits pre-filed as Staff Exhibits 101, 102, 103, 104, 105, 1501 and
19 1502.

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1 3. My pre-filed testimony and supporting exhibits are true and accurate. If I were asked the
2 same questions today, my answers would be the same.

3

4 SIGNED this 1st day of November, 2006.

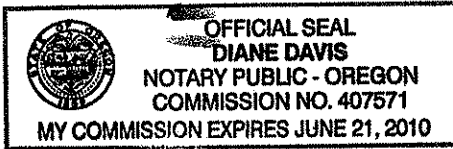
5

6 Maury Galbraith
7 MAURY GALBRAITH

8 SUBSCRIBED AND SWORN to before me this 1st day of November, 2006

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Diane Davis
Notary Public for Oregon
My Commission expires: 06-21-2010

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1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 180/UE 181/UE 184**

4 In the Matters of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY
7 Request for a General Rate Revision (UE 180)
8 Annual Adjustments to Schedule 125
9 (2007 RVM Filing) (UE 181)
10 Request for General Rate Revision relating to the
11 Port Westward Plant (UE 184)

AFFIDAVIT OF BILL WORDLEY

11 State of Oregon)
12) ss.
13 County of Marion)

13 I, Bill Wordley, hereby depose and say:

14 1. I am employed by the Public Utility Commission of Oregon (“the Commission”) as
15 senior economist in the Economic and Policy Analysis section of the Economic Research and
16 Financial Analysis Division.

17 2. In the course of my employment, I sponsored testimony in the above-captioned dockets
18 on behalf of Commission staff. My testimony was pre-filed as Staff Exhibits 200 and 1600,
19 accompanied by supporting exhibits pre-filed as Staff Exhibits 201, 202, 203, 204, 1601, 1602
20 and 1603.

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1 3. My pre-filed testimony and supporting exhibits are true and accurate. If I were asked the
2 same questions today, my answers would be the same.

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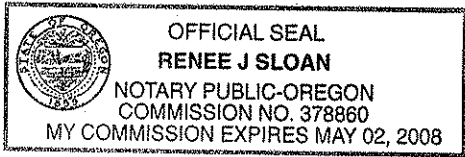
SIGNED this 31 day of October, 2006.

Bill Wordley
BILL WORDLEY

SUBSCRIBED AND SWORN to before me this 31 day of October, 2006

STATE OF OREGON
County of MARION

Renee J Sloan
Notary Public for Oregon
My Commission expires: May 2, 2008



1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 180/UE 181/UE 184**

4 In the Matters of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY
7 Request for a General Rate Revision (UE 180)
8 Annual Adjustments to Schedule 125
(2007 RVM Filing) (UE 181)
9 Request for General Rate Revision relating to the
10 Port Westward Plant (UE 184)

AFFIDAVIT OF ED DURRENBERGER

11 State of Oregon)
12 County of Marion) ss.

13 I, Ed Durrenberger, hereby depose and say:

14 1. I am employed by the Public Utility Commission of Oregon (“the Commission”) as a
15 senior revenue requirement analyst in the Rates and Tariffs Section of the Electric and Natural
16 Gas Division.

17 2. In the course of my employment, I sponsored testimony in the above-captioned dockets
18 on behalf of Commission staff. My testimony was pre-filed as Staff Exhibit 300 and
19 accompanied by supporting exhibits pre-filed as Staff Exhibits 301 and 302.

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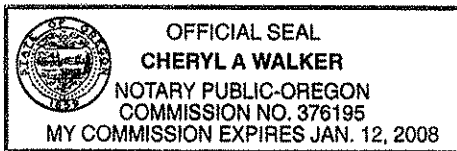
1 3. My pre-filed testimony and supporting exhibits are true and accurate. If I were asked the
2 same questions today, my answers would be the same.

3
4 SIGNED this 1 day of November 2006.

5
6 Ed Durrenberger
7 ED DURRENBERGER

8 SUBSCRIBED AND SWORN to before me this 1 day of November, 2006

9
10 Cheryl A. Walker
11 Notary Public for Oregon
12 My Commission expires: Jan. 12, 2008



1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 180/UE 181/UE 184**

4 In the Matters of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY
7 Request for a General Rate Revision (UE 180)
8 Annual Adjustments to Schedule 125
9 (2007 RVM Filing) (UE 181)
10 Request for General Rate Revision relating to the
11 Port Westward Plant (UE 184)

AFFIDAVIT OF CARLA OWINGS

11 State of Oregon)
12 County of Marion) ss.

13 I, Carla Owings, hereby depose and say:

14 1. I am employed by the Public Utility Commission of Oregon (“the Commission”) as
15 senior revenue requirement analysis in the Rates and Tariffs section of the Electric and Natural
16 Gas Division.

17 2. In the course of my employment, I sponsored testimony in the above-captioned dockets
18 on behalf of Commission staff. My testimony was pre-filed as Staff Exhibits 400 and 1800,
19 accompanied by supporting exhibits pre-filed as Staff Exhibits 401, 402, and 1801.

20 3. I also co-sponsored Joint Testimony in the above-captioned dockets on behalf of
21 Commission staff. The joint testimony was pre-filed as Staff-PGE-CUB Exhibit 100.

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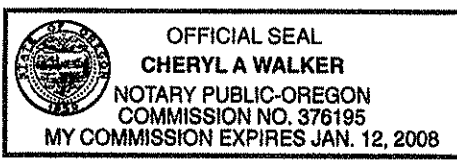
3. My pre-filed testimony and supporting exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 31 day of October, 2006.

Carla Owings
CARLA OWINGS

SUBSCRIBED AND SWORN to before me this 31 day of October, 2006

Cheryl A. Walker
Notary Public for Oregon
My Commission expires: Jan. 12, 2008



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 180/UE 181/UE 184**

In the Matters of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision (UE 180)

Annual Adjustments to Schedule 125
(2007 RVM Filing) (UE 181)

Request for General Rate Revision relating to the
Port Westward Plant (UE 184)

AFFIDAVIT OF LISA SCHWARTZ

State of Oregon)
) ss.
County of Marion)

I, Lisa Schwartz, hereby depose and say:

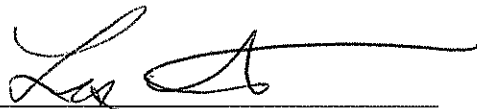
1. I am employed by the Public Utility Commission of Oregon (“the Commission”) as a senior utility analyst in the Resource and Market Analysis Section of the Electric and Natural Gas Division.

2. In the course of my employment, I sponsored testimony in the above-captioned dockets on behalf of Commission staff. My testimony was pre-filed as Staff Exhibit 600 and 1700, accompanied by supporting exhibits pre-filed as Staff Exhibits 601 and 602.

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3. My pre-filed testimony and supporting exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 31 day of October, 2006.

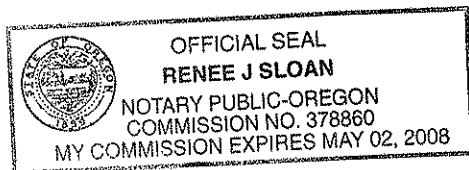


LISA SCHWARTZ

SUBSCRIBED AND SWORN to before me this 31 day of October, 2006

State of Oregon
County of Marion

Renee J Sloan
Notary Public for Oregon
My Commission expires: May 2, 2008



1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 180/UE 181/UE 184**

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6 COMPANY
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11 Port Westward Plant (UE 184)

AFFIDAVIT OF JR GONZALEZ

11 State of Oregon)
12) ss.
13 County of Marion)

14 I, JR Gonzalez, hereby depose and say:

15 1. I am employed by the Public Utility Commission of Oregon (“the Commission”) as
16 Program Manager of the Utility Safety and Reliability Section in the Electric and Natural Gas
17 Division.

18 2. In the course of my employment, I sponsored testimony in the above-captioned dockets
19 on behalf of Commission staff. My testimony was pre-filed as Staff Exhibit 700, accompanied
20 by supporting exhibits pre-filed as Staff Exhibits 701 and 702.

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1 3. My pre-filed testimony and supporting exhibits are true and accurate. If I were asked the
2 same questions today, my answers would be the same.

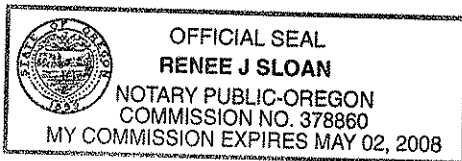
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4 SIGNED this 1 day of NOV, 2006.

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6 
7 JR GONZALEZ

8 SUBSCRIBED AND SWORN to before me this 1ST day of November, 2006

9
10 State of Oregon
11 County of Marion

Renee J Sloan
Notary Public for Oregon
My Commission expires: May 2, 2008



1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 180/UE 181/UE 184**

4 In the Matters of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY
7 Request for a General Rate Revision (UE 180)
8 Annual Adjustments to Schedule 125
9 (2007 RVM Filing) (UE 181)
10 Request for General Rate Revision relating to the
11 Port Westward Plant (UE 184)

AFFIDAVIT OF THOMAS D. MORGAN

11 State of Oregon)
12) ss.
13 County of Marion)

13 I, Thomas D. Morgan, hereby depose and say:


14 1. I am employed by the Public Utility Commission of Oregon (“the Commission”) as a
15 Financial Economist in the Economic Research & Financial Analysis Division.

16 2. In the course of my employment, I sponsored testimony in the above-captioned dockets
17 on behalf of Commission staff. My testimony was pre-filed as Staff Exhibits 1000 and 1400,
18 accompanied by supporting exhibits pre-filed as Staff Exhibits 1001, 1002, 1003, 1401, 1402,
19 and 1403.

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1 3. My pre-filed testimony and supporting exhibits are true and accurate. If I were asked the
2 same questions today, my answers would be the same.

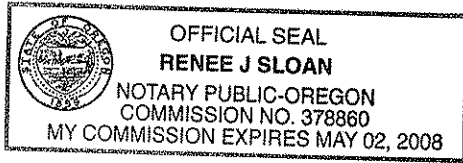
3
4 SIGNED this 31st day of October, 2006.

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6 
7 THOMAS D. MORGAN

8 SUBSCRIBED AND SWORN to before me this 31 day of October, 2006

9
10 state of Oregon
11 County of Marion

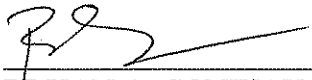
Renee J Sloan
Notary Public for Oregon
My Commission expires: May 4, 2008



1 3. My pre-filed testimony and supporting exhibits as corrected in Staff/1801 are true and
2 accurate. If I were asked the same questions today, my answers would be the same.

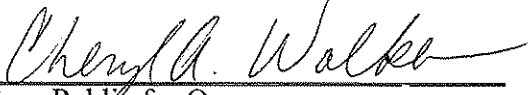
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SIGNED this 31 day of October, 2006.

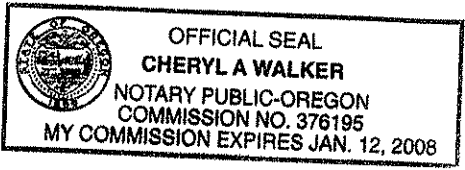


BRYAN A. CONWAY

SUBSCRIBED AND SWORN to before me this 31 day of October, 2006

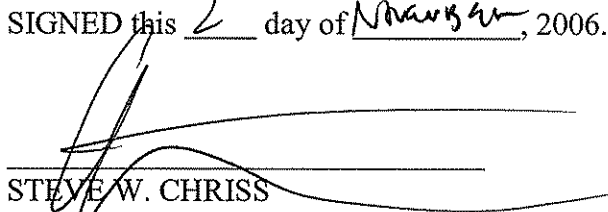


Notary Public for Oregon
My Commission expires: Jan. 12, 2008



1 3. My pre-filed testimony and supporting exhibits are true and accurate. If I were asked the
2 same questions today, my answers would be the same.

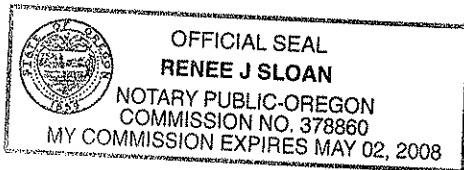
3
4 SIGNED this 2nd day of November, 2006.

5
6 
7 STEVE W. CHRISS

8 SUBSCRIBED AND SWORN to before me this 2nd day of November, 2006

9 *State of Oregon*
10 *County of Marion*

11 *Renee J. Sloan*
12 Notary Public for Oregon
13 My Commission expires: *May 2, 2008*



1 **CERTIFICATE OF SERVICE**

2
3 I certify that on November 2, 2006, I served the foregoing Staff Affidavits upon all
4 parties of record in this proceeding by delivering a copy by electronic mail and by mailing a
5 copy by postage prepaid first class mail or by hand delivery/shuttle mail to the parties accepting
6 paper service.

7 **JIM DEASON - CONFIDENTIAL**
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10 PORTLAND OR 97258-2014
11 jimdeason@comcast.net

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CITIZENS' UTILITY BOARD OF OREGON
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40 **BRUBAKER & ASSOCIATES INC**
41 JAMES T SELECKY - **CONFIDENTIAL**
42 1215 FERN RIDGE PKWY - STE 208
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44 jtselecky@consultbai.com

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S BRADLEY VAN CLEVE - **CONFIDENTIAL**
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4 **EPCOR MERCHANT & CAPITAL (US) INC**
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6 lwhittles@epcor.ca

7 **GRESHAM CITY ATTORNEY'S OFFICE**
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SR. ASST. CITY ATTORNEY
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9 GRESHAM OR 97030
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10 **GRESHAM CITY OF**
JOHN HARRIS -**CONFIDENTIAL**
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14 **KAFOURY & MCDUGAL**
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17 **LEAGUE OF OREGON CITIES**
ANDREA FOGUE - **CONFIDENTIAL**
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18 PO BOX 928
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19 SALEM OR 97308
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20 **MCDOWELL & ASSOCIATES PC**
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PORTLAND OR 97204
22 katherine@mcd-law.com

23 **W**
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24 LON L PETERS - **CONFIDENTIAL**
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26

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W
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TRANSPORTATION
RICHARD GRAY
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