

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER THE PUBLIC UTILITY COMMISSION OF OREGON	)	)	)	)	)
Investigation Into Qualifying Facility Contracting and Pricing	)	)	)	)	)
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CASE NO. UM 1610

MOTION TO ADMIT TESTIMONY  
AND EXHIBITS OF THE COMMUNITY  
RENEWABLE ENERGY ASSOCIATION

Pursuant to the instruction of Administrative Law Judge (“ALJ”) Shani Pines at the hearing in this case, the Community Renewable Energy Association (“CREA”) hereby respectfully submits its motion to admit CREA’s testimony and exhibits. By this motion, CREA moves to admit into the record: (1) CREA’s pre-filed testimony and exhibits, and (2) CREA’s hearing exhibits, to the extent that CREA’s hearing exhibits have not yet been admitted.

**Pre-filed Testimony and Exhibits**

CREA’s pre-filed testimony and exhibits are as follows:

CREA/100-105	Direct Testimony and Exhibits of Ormand Hilderbrand
CREA/200-204	Direct Testimony and Exhibits of Dr. Don Reading
CREA/300-304	Direct Testimony and Exhibits of Tom Svendsen
CREA/400	Reply Testimony of Ormand Hilderbrand

These exhibits are supported by the attached affidavits of the witnesses.

**Hearing Exhibits**

CREA’s hearing exhibits, which were pre-filed prior to the hearing, are as follows:

CREA/500	<i>Gas Transmission Northwest, LLC</i> , 142 FERC ¶ 61,186 (2013)
CREA/501	Idaho Power Initial & Supplemental Response to CREA Data Request 3.3

CREA/502           PacifiCorp's Schedule 37 PPA Off-System PPA  
CREA/503           PacifiCorp Response to CREA Data Requests 4.1, 4.2, 4.3, 4.4, 4.5 & 4.7  
CREA/504           PacifiCorp Response to Three Mile Canyon Data Request 1.6  
CREA/505           UE 235 PacifiCorp Advice 11-011 Proposed Tariff  
CREA/506           *Farmers Irrigation District v. PacifiCorp*, OPUC Docket No. UM 1441,  
                          ALJ Ruling (Sept. 8, 2009)

At the hearing, ALJ Pines admitted into the record the following exhibits: CREA/502, CREA/503, CREA/504, CREA/505, and CREA/506. To the extent that CREA/500 and CREA/501 have not yet been admitted to the record, CREA respectfully requests that these exhibits be admitted to the record. CREA/500 pertains to issues specific to Portland General Electric Company ("PGE"), and PGE stipulated to admit this exhibit prior to the hearing. Likewise, CREA/501 pertains to issues specific to Idaho Power, and Idaho Power stipulated to admit this exhibit prior to the hearing.

RESPECTFULLY SUBMITTED this 29<sup>th</sup> day of May 2013.

RICHARDSON & O'LEARY, PLLC

*/s/ Gregory M. Adams*

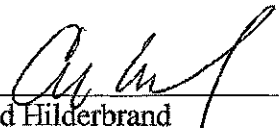
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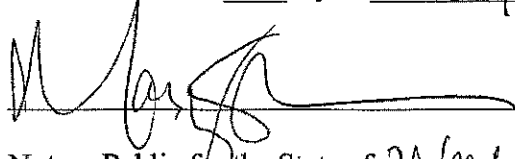


I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct based on my information and belief.

I signed this the 24<sup>th</sup> day of May 2013.

  
Ormand Hilderbrand

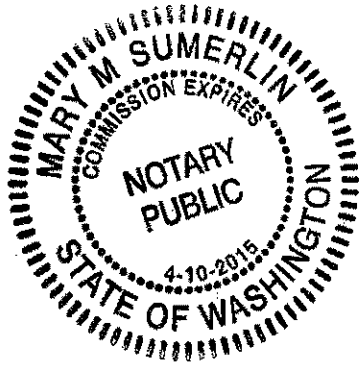
SUBSCRIBED AND SWORN to before me this 24<sup>th</sup> day of May 2013.



Notary Public for the State of Washington

Residing at Walla Walla

My Commission expires 4-10-15



BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

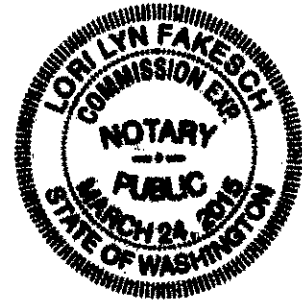
IN THE MATTER THE PUBLIC UTILITY  
COMMISSION OF OREGON

Investigation Into Qualifying Facility  
Contracting and Pricing

CASE NO. UM 1610

AFFIDAVIT OF TOM SVENDSEN  
REGARDING TESTIMONY AND  
EXHIBITS

STATE OF Washington )  
County of Klickitat ) ss.



I, Tom Svendsen, being first duly sworn on oath, depose and say:

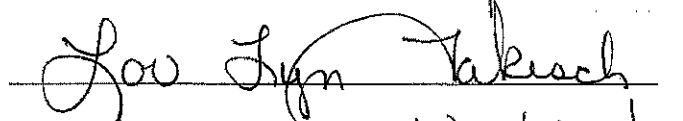
1. My name is Tom Svendsen.
2. I am the same Tom Svendsen that previously filed the following testimony and exhibits on behalf of the Community Renewable Energy Association: CREA/300-304.
3. My pre-filed testimony and exhibits are true and accurate based on my information and belief. If I were to answer those questions today, my responses would be the same.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct based on my information and belief.

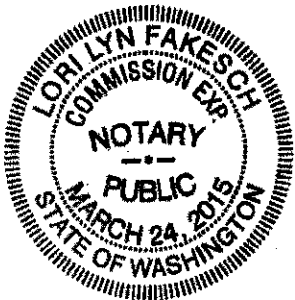
I signed this the 23<sup>rd</sup> day of MAY 2013.

  
Tom Svendsen

SUBSCRIBED AND SWORN to before me this 23 day of May 2013.

  
Notary Public for the State of Washington  
Residing at Klickitat

My Commission expires March 24, 2015



BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER THE PUBLIC UTILITY  
COMMISSION OF OREGON

Investigation Into Qualifying Facility  
Contracting and Pricing

CASE NO. UM 1610

AFFIDAVIT OF DON C. READING  
REGARDING TESTIMONY AND  
EXHIBITS

STATE OF IDAHO )  
County of ADA ) ss.

I, Don C. Reading, being first duly sworn on oath, depose and say:

1. My name is Don C. Reading.
2. I am the same Don C. Reading that previously filed the following testimony and exhibits on behalf of the Community Renewable Energy Association: CREA/200-204.
3. My pre-filed testimony and exhibits are true and accurate based on my information and belief. If I were to answer those questions today, my responses would be the same.

I declare under penalty of perjury under the laws of the state of IDAHO that the foregoing is true and correct based on my information and belief.

I signed this the 23<sup>rd</sup> day of MAY 2013.

Don C. Reading  
Don C. Reading

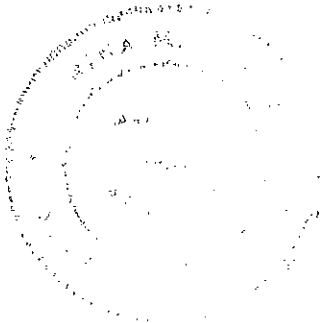
SUBSCRIBED AND SWORN to before me this 23<sup>rd</sup> day of May 2013.

Dena M. Curtis

Notary Public for the State of IDAHO

Residing at Boise, ID

My Commission expires 3/19/15





## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29<sup>th</sup> day of May, 2013, a true and correct copy of the within and foregoing **MOTION TO ADMIT TESTIMONY AND EXHIBITS OF THE COMMUNITY RENEWABLE ENERGY ASSOCIATION** was served as shown to:

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