

ELLEN F. ROSENBLUM
Attorney General



FREDERICK M. BOSS
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DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

October 6, 2015

VIA E-MAIL ONLY

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: *In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Investigation into
Qualifying Facility Contracting and Pricing*
PUC Docket No.: UM 1610 / Phase 2
DOJ File No.: 330-030-GN0240-12

To the Filing Center:

On behalf of the Oregon Department of Energy ("Department"), enclosed for electronic filing today with the Commission in the above-captioned matter is the Department's MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS and the accompanying Affidavits of Philip Carver and Diane Broad.

Sincerely,

Renee M. France
Senior Assistant Attorney General
Natural Resources Section

Enclosures
RMF:jrs/#6834487

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UM 1610**

4 In the matter of)
5 PUBLIC UTILITY COMMISSION OF) MOTION TO ADMIT PRE-FILED
6 OREGON) TESTIMONY AND EXHIBITS
7)
8 Investigation into Qualifying)
9 Facility Contracting and Pricing)
10)
11 _____)

12 In accordance with OAR 860-001-0420, the Oregon Department of Energy (ODOE)
13 moves for the following pre-filed testimony and exhibits to be admitted into the record in this
14 proceeding:

- 15 1. Opening Testimony of Philip Carver (ODOE/700);
16 2. Exhibit to Opening Testimony of Philip Carver (ODOE/701);
17 3. Response Testimony of Philip Carver (ODOE/900);
18 4. Reply Testimony of Philip Carver (ODOE/1100);
19 5. Opening Testimony of Diane Broad (ODOE/800);
20 6. Exhibit to Opening Testimony of Diane Broad (ODOE/801);
21 7. Response Testimony of Diane Broad (ODOE/1000);
22 8. Reply Testimony of Diane Broad (ODOE/1200);
23 9. Joint Reply Testimony of Philip Carver and Diane Broad (ODOE/1300).

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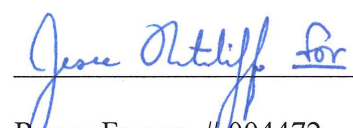
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This motion is supported by the affidavits of Philip Carver and Diane Broad attesting that their pre-filed testimony and exhibits are true and correct.

Respectfully submitted this 6th day of October 2015.

OSR # 043944



Renee France, #004472
Senior Assistant Attorney General
Of Attorneys for Oregon Department
of Energy, State of Oregon

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1610**

In the matter of)
PUBLIC UTILITY COMMISSION OF) AFFIDAVIT OF PHIL CARVER
OREGON)
Staff Investigation into Qualifying)
Facility Contracting and Pricing)
State of Oregon)
County of Marion)
_____)

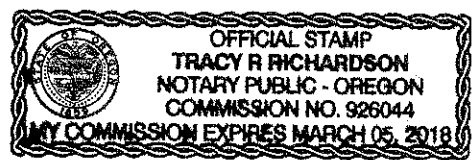
14 I, Phil Carver, being first duly sworn oath, depose and say:

- 15 1. My name is Phil Carver. I am an Energy Analyst for the Oregon Department of Energy
16 (ODOE).
17 2. I am the same Phil Carver that filed testimony on behalf of ODOE in this matter
18 (Opening Testimony (ODOE/700); Exhibit to Opening Testimony (ODOE/701);
19 Response Testimony (ODOE/900); Reply Testimony (ODOE/1100); and joint Reply
20 Testimony with Diane Broad (ODOE/1300)).
21 3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were
22 asked the same questions today, my answers would be the same.

23 Signed this 6th day of October 2015.

24 Signed: Phil Carver

25 State of Oregon, County of Marion
Signed before me on October 6th 2015
by Phil Carver.
Tracy R
Notary Public # 926044
my commission expires March 5, 2018



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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1610**

In the matter of)
PUBLIC UTILITY COMMISSION OF) AFFIDAVIT OF DIANE BROAD
OREGON)
Staff Investigation into Qualifying)
Facility Contracting and Pricing)
State of Oregon)
County of Marion)
_____)

14 I, Diane Broad, being first duly sworn oath, depose and say:

- 15 1. My name is Diane Broad. I am an Energy Analyst for the Oregon Department of
- 16 Energy (ODOE).
- 17 2. I am the same Diane Broad that filed testimony on behalf of ODOE in this matter
- 18 (Opening Testimony (ODOE/800); Exhibit to Opening Testimony (ODOE/801);
- 19 Response Testimony (ODOE/1000); Reply Testimony (ODOE/1200); and joint Reply
- 20 Testimony with Philip Carver (ODOE/1300)).
- 21 3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were
- 22 asked the same questions today, my answers would be the same.

23 Signed this 6th day of October 2015.

24 state of Oregon
25 County of Marion
Signed before me on October 6th, 2015
by Diane Broad.

Signed: Diane Broad

Tracy R. Richardson
Notary Public # 926044
My Commission Expires March 5, 2018

