

ELLEN F. ROSENBLUM
Attorney General



FREDERICK M. BOSS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

September 24, 2014

Attention: Filing Center
Public Utility Commission of Oregon
3930 Fairview Industrial Drive SE
P.O. Box 1088
Salem, OR 97308-1088

Re: *In the Matter of PACIFICORP, dba PACIFIC POWER, Application for Deferred Accounting and Prudence Determination Associated with the Energy Imbalance Market*
OPUC Docket No.: UM 1689
DOJ File No.: 860115-GB0316-14

Enclosed for filing with the Commission today, please find an original and one copy STAFF'S MOTION TO ADMIT PRE-FILED TESTIMONY in the above-captioned docket.

Sincerely,

Michael T. Weirich
Assistant Attorney General
Business Activities Section

Enclosures

MTW:jrs/#5852676

c: UM 1689 service list (electronic copies only)

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1689

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Application for Deferred Accounting and
Prudence Determination Associated with the
Energy Imbalance Market.


STAFF'S MOTION TO ADMIT PRE-FILED
TESTIMONY

Staff of the Public Utility Commission of Oregon ("Staff") requests that the Administrative Law Judge admit Staff's pre-filed testimony and exhibits in this docket along with Settling Parties/100. The above-referenced testimony and exhibits were previously filed with the Commission in this docket. The affidavits of Deborah Garcia and Brittany Andrus attesting to the truthfulness of their testimony are attached to this motion.

Dated this 24th day of September, 2014.

Respectfully submitted,

ELLEN ROSENBLUM
Attorney General


Michael T. Weirich, #82425
Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1689

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Application for Deferred Accounting and
Prudence Determination Associated with the
Energy Imbalance Market.

AFFIDAVIT OF BRITTANY ANDRUS

STATE OF OREGON)

County of Marion)

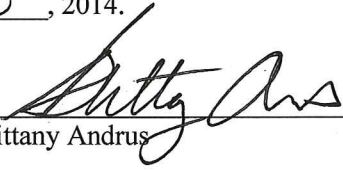
I, Brittany Andrus, being duly sworn on oath depose and say:

1. My name is Brittany Andrus. I am employed by the Public Utility
Commission of Oregon as a Senior Utility Analyst.

2. I sponsored the following two exhibits on behalf of Commission Staff in this
matter: Staff/100 and Staff/101.

3. My testimony and exhibits are true and accurate based on my information and
belief. If I were to answer these questions today, my responses would be the same.

Dated this 23 day of September, 2014.



Brittany Andrus

SUBSCRIBED AND SWORN to before me this 23 day of September, 2014.





Notary Public, State of Oregon

County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF BRITTANY ANDRUS
#5850573

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1689

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Application for Deferred Accounting and
Prudence Determination Associated with the
Energy Imbalance Market.

AFFIDAVIT OF DEBORAH GARCIA

STATE OF OREGON)

County of Marion)

I, Deborah Garcia, being duly sworn on oath depose and say:

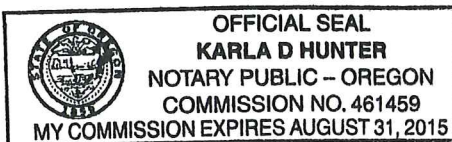
1. My name is Deborah Garcia. I am employed by the Public Utility Commission of Oregon as a Senior Revenue Requirement Analyst.
2. I sponsored the following three exhibits on behalf of Commission Staff in this matter: Staff/200, Staff/201 and Settling Parties/100.
3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

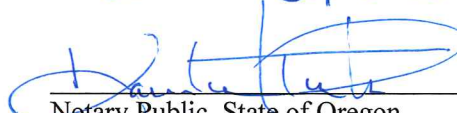
Dated this 22nd day of September, 2014.



Deborah Garcia

SUBSCRIBED AND SWORN to before me this 22nd day of September, 2014.





Notary Public, State of Oregon
County of marion
My Commission Expires: August 31, 2015

AFFIDAVIT OF DEBORAH GARCIA
#5850579

CERTIFICATE OF SERVICE

I certify that on September 24, 2014, I served the foregoing STAFF MOTION TO MODIFY SCHEDULE upon the following parties in this proceeding by sending a true, exact and full copy by electronic mail only as all parties waive paper service.

OPUC Dockets
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Business Activities Section
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michael.weirich@state.or.us

(C)= Confidential

DATED this 24th day of September, 2014.



Melissa M. Eastlund
Legal Secretary
Business Activities Section