

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 294

In the Matter of
PORTLAND GENERAL ELECTRIC
COMPANY
Request for a General Rate Revision

MOTION TO ADMIT PRE-FILED STAFF
TESTIMONY

Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law Judge to admit the following pre-filed exhibits into the record in the above-captioned docket:

Exhibit No.	Exhibit
Staff Exhibit 100	Power Cost Opening Testimony of John Crider
Staff Exhibit 101	Witness Qualification Statement of John Crider
Staff Exhibit 102	Staff Memorandum on Forced Outage Calculation
Staff Exhibit 103	U.S. Energy Information Administration Capacity Factor Table
Staff Exhibit 104	PGE SEC 8K Filing (Coyote Springs Outage)
Staff Exhibit 105	PGE IRP Load/Resource Balance 2009-2015
Staff Exhibit 200	Opening Testimony of Matthew Muldoon
Staff Exhibit 201	Witness Qualification Statement of Matthew Muldoon
Staff Exhibit 202	Staff Peer Screening
Staff Exhibit 203	Staff Three Stage DCF Modeling
Staff Exhibit 204	Staff Synthetic Forward Curve TIPS Analysis
Staff Exhibit 205	Staff Historical GDP Analysis with BEA Data
Staff Exhibit 206	Representative GDP Growth Projections
Staff Exhibit 207	Cost of Long-term Debt - Confidential

1	Staff Exhibit 208	PGE Depiction of Rate Base Expansion to Investors
2	Staff Exhibit 209	Value Line (VL) Electric Utility Profiles
3	Staff Exhibit 210	Moody's Investor Services Sector In-Depth – U.S. Regulated Utilities
4	Staff Exhibit 211	Frequency of GRC Filings by PGE Peer Utilities (Screened by Staff)
5	Staff Exhibit 300	Opening Testimony of George R. Compton
6	Staff Exhibit 301	Witness Qualification Statement of George R. Compton
7	Staff Exhibit 302	Staff Comparison for Allocation of Transmission Costs
8	Staff Exhibit 303	Staff Comparison of Rate Design and Revenue Targets for Schedules 32
9		and 47
10	Staff Exhibit 304	Staff Comparison of Rate Design and Revenue Targets for Schedules 38
11		and 49
12	Staff Exhibit 305	PGE Commercial and Industrial Pricing
13	Staff Exhibit 400	Opening Testimony of Suparna Bhattacharya
14	Staff Exhibit 401	Witness Qualification Statement of Suparna Bhattacharya
15	Staff Exhibit 402	Wind-Direct Marginal Energy Cost - Confidential
16	Staff Exhibit 403	Marginal Generation Cost with Wind Integration - Confidential
17	Staff Exhibit 404	Marginal Energy Costs for each Schedule - Confidential
18	Staff Exhibit 405	PGE Responses to Staff Data Requests
19	Staff Exhibit 500	Opening Testimony of Robert Fonner
20	Staff Exhibit 501	Witness Qualification Statement of Robert Fonner
21	Staff Exhibit 502	PGE Responses to Staff Data Requests
22	Staff Exhibit 503	Forecast of Paperless Billing
23	Staff Exhibit 504	Staff's Customer Marginal Cost Adjustment
24	Staff Exhibit 600	Opening Testimony of Brittany Andrus

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1	Staff Exhibit 601	Witness Qualification Statement of Brittany Andrus
2	Staff Exhibit 602	PGE Responses to Staff Data Requests
3	Staff Exhibit 700	Opening Testimony of Marianne Gardner
4	Staff Exhibit 701	Witness Qualification Statement of Marianne Gardner
5	Staff Exhibit 702	PGE Response to Staff Data Request
6	Staff Exhibit 800	Opening Testimony of Judy Johnson
7	Staff Exhibit 801	Witness Qualification Statement of Judy Johnson
8	Staff Exhibit 900	PGE Response to Staff Data Request
9	Staff Exhibit 900	Opening Testimony of Jorge Ordonez
10	Staff Exhibit 901	Witness Qualification Statement of Jorge Ordonez
11	Staff Exhibit 1000	Testimony of Marianne Gardner in Support of Partial Stipulation
12	Staff Exhibit 1100	Testimony of Michael Breish in Support of Partial Stipulation
13	Staff Exhibit 1101	Witness Qualification Statement of Michael Breish
14	Staff Exhibit 1102	PGE Responses to Staff Data Requests
15	Staff Exhibit 1200	Testimony of Mitchell Moore in Support of Partial Stipulation
16	Staff Exhibit 1201	Witness Qualification Statement of Mitchell Moore
17	Staff Exhibit 1202	PGE Responses to Staff Data Requests
18	Staff Exhibit 1300	Opening Testimony of Brian Bahr
19	Staff Exhibit 1301	Witness Qualification Statement of Brian Bahr
20	Staff Exhibit 1302	Information Reviewed by Staff - Confidential
21	Staff Exhibit 1400	Testimony of Judy Johnson in Support of Partial Stipulation
22	Staff Exhibit 1500	Testimony of George R. Compton in Support of Partial Stipulation
23	Staff Exhibit 1600	Testimony of Linnea Wittekind in Support of Partial Stipulation
24	Staff Exhibit 1601	Witness Qualification Statement of Linnea Wittekind
25	Staff Exhibit 1602	Excerpt from Order No. 09-020

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

AFFIDAVIT OF JOHN CRIDER

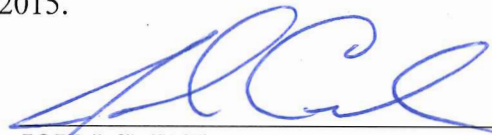
Request for a General Rate Revision.

State of Oregon)
) ss
County of Marion)

I, JOHN CRIDER, hereby depose and say:

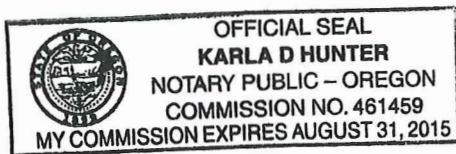
1. I am a Senior Utility Analyst employed by the Public Utility Commission of Oregon (“Commission”). I work in the Energy Resources and Planning Division.
2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 100, along with Staff Exhibit 101 (witness qualification statement). In addition, I drafted testimony that was pre-filed as Staff Exhibit 1900.
3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

SIGNED this 20th day of August 2015.



JOHN CRIDER

SUBSCRIBED AND SWORN to before me this 20th day of August 2015.





Notary Public for Oregon
My Commission Expires: 8/31/15

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

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In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

AFFIDAVIT OF BRITTANY ANDRUS

Request for a General Rate Revision.

STATE OF OREGON)
) ss
County of Marion)

I, BRITTANY ANDRUS, hereby depose and say:

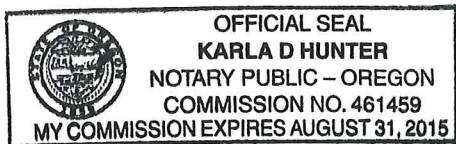
1. I am a Senior Utility Analyst employed by the Public Utility Commission of Oregon (“Commission”). I work in the Energy Resources and Planning Division.
2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 600, along with Staff Exhibit 601 (witness qualification statement).
3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

SIGNED this 21st day of August 2015.



BRITTANY ANDRUS

SUBSCRIBED AND SWORN TO before me this 21st day of August 2015





Notary Public for Oregon

My Commission Expires: 8/31/15

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

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In the Matter of:
PORTLAND GENERAL ELECTRIC
COMPANY
Request for a General Rate Revision.

AFFIDAVIT OF MARIANNE GARDNER

STATE OF OREGON)
County of Marion) ss

I, MARIANNE GARDNER, hereby depose and say:

1. I am a Senior Revenue Requirement Analyst employed by the Public Utility Commission of Oregon (“Commission”). I work in the Energy – Rates, Finance and Audit Division.
2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 700, along with Staff Exhibit 701 (witness qualification statement). In addition, I drafted testimony that was pre-filed as Staff Exhibit 1000. I am also a sponsoring witness for the joint testimony filed in support of the Partial Stipulation and Second Stipulation filed in this docket.
3. To the best of my knowledge, my testimony and witness qualification statement are true and accurate.

SIGNED this 31 day of August 2015.

Marianne Gardner
MARIANNE GARDNER

SUBSCRIBED AND SWORN to before me this 31st day of August 2015.



Karla D Hunter
Notary Public for Oregon
My Commission Expires: August 31, 2015

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

AFFIDAVIT OF JUDY JOHNSON

Request for a General Rate Revision.

STATE OF OREGON)
) ss
County of Marion)

I, JUDY JOHNSON, hereby depose and say:

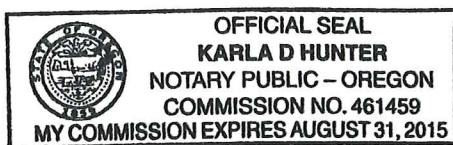
1. I am a Senior Financial Economist employed by the Public Utility Commission of Oregon. I work in the Energy – Rates, Finance and Audit Division.
2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 800, along with Staff Exhibit 801 (witness qualification statement). In addition, I drafted testimony that was pre-filed as Staff Exhibit 1400.
3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.


SIGNED this 20th day of August 2015.



JUDY JOHNSON

SUBSCRIBED AND SWORN TO before me this 20th day of August 2015.





NOTARY PUBLIC FOR OREGON
My Commission Expires: 8/31/15

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

AFFIDAVIT OF JORGE ORDONEZ

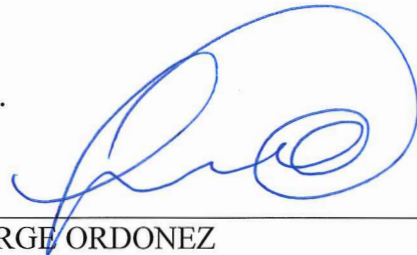
Request for a General Rate Revision.

State of Oregon)
) ss.
County of Marion)

I, JORGE ORDONEZ, hereby depose and say:

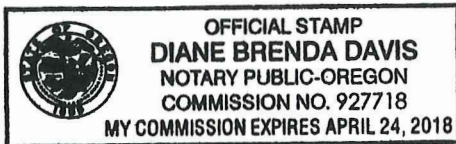
1. I am a Senior Economist employed by the Public Utility Commission of Oregon (“Commission”). I work in the Energy Resources and Planning Division.
2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 900, along with Staff Exhibit 901 (witness qualification statement). In addition, I drafted testimony that was pre-filed as Staff Exhibit 1700.
3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

SIGNED this 19th day of August 2015.



JORGE ORDONEZ

SUBSCRIBED AND SWORN to before me this 19th day of August 2015.



Diane Brenda Davis
Notary Public for Oregon
My Commission Expires: 04-24-18

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

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In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision.

AFFIDAVIT OF MICHAEL BREISH

STATE OF OREGON)
County of Marion) ss

I, MICHAEL BREISH, hereby depose and say:

- I am a Utility Analyst employed by the Public Utility Commission of Oregon (“Commission”). I work in the Energy Resources and Planning Division.
- On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 1100, along with Staff Exhibit 1101 (witness qualification statement).
To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

DATED 24 of August 2015.

Michael Breish
MICHAEL BREISH

SUBSCRIBED AND SWORN TO before me this 24th day of August 2015.



Karla D Hunter
NOTARY PUBLIC FOR OREGON
My Commission Expires: August 31, 2015

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

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In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision.

AFFIDAVIT OF MITCHELL MOORE

STATE OF OREGON)
County of Marion) ss

I, MITCHELL MOORE, hereby depose and say:

- 1. I am a Senior Utility Analyst employed by the Public Utility Commission of Oregon (“Commission”). I work in the Energy – Rates, Finance and Audit Division.
- 2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 1200, along with Staff Exhibit 1201 (witness qualification statement).
- 3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

DATED 19 of August 2015.


MITCHELL MOORE

SUBSCRIBED AND SWORN TO before me this 19 day of August 2015.




NOTARY PUBLIC FOR OREGON
My Commission Expires: 4-24-18

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 294

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision


AFFIDAVIT OF BRIAN BAHR

State of Oregon)
)
County of Marion) ss.

I, BRIAN BAHR, hereby depose and say:

1. I am a Senior Utility Analyst employed by the Public Utility Commission of Oregon ("Commission"). I work in the Energy – Rates, Finance and Audit Division.
2. I drafted testimony that was pre-filed in this docket as Staff Exhibit 1300, along with Staff Exhibit 1301 (witness qualification statement).
3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

SIGNED this 31 day of August 2015.



Brian Bahr

SUBSCRIBED AND SWORN to before me this 31st day of August 2015.





Notary Public for Oregon
My Commission Expires: August 31, 2015

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

AFFIDAVIT OF LINNEA WITTEKIND

Request for a General Rate Revision.

STATE OF OREGON)
County of Marion) ss

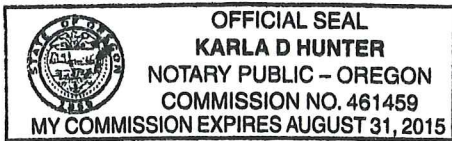
I, LINNEA WITTEKIND, hereby depose and say:

- 1. I am a Senior Financial Analyst employed by the Public Utility Commission of Oregon (“Commission”). I work in the Energy – Rates, Finance and Audit Division.
- 2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 1600, along with Staff Exhibit 1601 (witness qualification statement).
- 3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

SIGNED this 24th day of August 2015.

[Handwritten Signature]
LINNEA WITTEKIND

SUBSCRIBED AND SWORN to before me this 24th day of August 2015.



[Handwritten Signature]
Notary Public for Oregon
My Commission Expires: August 31, 2015

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 294

In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

AFFIDAVIT OF PHIL BOYLE

Request for a General Rate Revision.

STATE OF OREGON)
County of Marion) ss

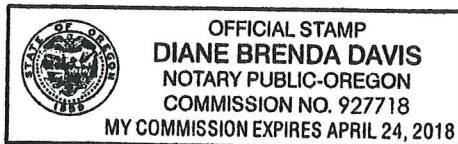
I, PHIL BOYLE, hereby depose and say:

1. I am the Consumer Services Manager for the Public Utility Commission of Oregon ("Commission").
2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as Staff Exhibit 1800, along with Staff Exhibit 1801 (witness qualification statement).
3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

DATED the 19th of August 2015.

Phil Boyle
PHIL BOYLE

SUBSCRIBED AND SWORN TO before me this 19th day of August 2015.



Diane Brenda Davis
NOTARY PUBLIC FOR OREGON
My Commission Expires: 4-24-18