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Members**

3Degrees  
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Atkins  
Bonneville Environmental  
Foundation  
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Community College  
Community Renewable  
Energy Association  
DNV GL  
EDF Renewable Energy  
EDP Renewables  
Environment Oregon  
Environment Washington  
Eurus Energy America  
EverPower  
GE Energy  
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Idaho Conservation League  
Invenergy  
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NW Energy Coalition  
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Oregon Solar Energy  
Industries Association  
OSPIRG  
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Orion Renewable Energy  
Group LLC  
Principle Power  
REC Silicon  
RES America Developments  
Solar Oregon  
Stoel Rives, LLP  
SunPower Corporation  
Vestas Americas  
Warm Springs Power &  
Water Enterprises  
Washington Environmental Council  
WashPIRG  
Western Resource Advocates

June 10, 2016

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Portland, OR 97204  
[www.RenewableNW.org](http://www.RenewableNW.org)  
503.223.4544



**Renewable  
Northwest**

***Via Electronic Mail***

Public Utility Commission of Oregon  
Attn: Filing Center  
[PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

Re: In the Matter of PUBLIC UTILITY COMMISSION OF  
OREGON, Investigation to Explore Issues Related to a  
Renewable Generator's Contribution to Capacity  
**Docket No. UM 1719**

Dear Filing Center:

Enclosed for filing in the above-referenced docket are Renewable Northwest's  
Motion to Admit Pre-Filed Testimony and the affidavit of witness Michael H.  
O'Brien.

Thank you for your assistance, and please do not hesitate to contact our office if  
you have any questions.

Sincerely,

/s/ Silvia Tanner  
Silvia Tanner  
Staff Counsel  
Renewable Northwest

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1719**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation to Explore Issues  
Related to a Renewable Generator's  
Contribution to Capacity

MOTION TO ADMIT PRE-FILED  
TESTIMONY

Pursuant to OAR 860-001-0420, Renewable Northwest respectfully moves for the admission of the pre-filed testimony of Michael H. O'Brien (RNW/100) into the record of this proceeding. The above-referenced testimony was previously filed with the Commission and is Renewable Northwest's testimony in this docket.

The affidavit of Michael H. O'Brien attesting to the truthfulness of his testimony is attached to this Motion.

Respectfully submitted this 10<sup>th</sup> day of June, 2016,

/s/ Silvia Tanner

Silvia Tanner  
Staff Counsel  
Renewable Northwest

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

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AFFIDAVIT OF MICHAEL H. O'BRIEN

I, Michael O'Brien, being first duly sworn on oath, depose and say:

1. My name is Michael O'Brien. I am the Senior Policy Analyst for Renewable Northwest ("RNW").
2. I filed testimony (RNW/100) on behalf of RNW in this matter.
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

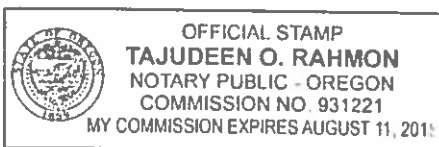
I declare under penalty of perjury under the laws of the state of Oregon that the foregoing is true and correct based on my information and belief.

SIGNED this 10 day of June, 2016

*M. H. O'Brien*

Michael H. O'Brien

SUBSCRIBED AND SWORN to before me this 10<sup>th</sup> day of June, 2016.



*T. Rahmon*  
Notary Public for Oregon

My Commission Expires: Aug 11<sup>th</sup> 2018