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May 30, 2019

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
Application for the Deferral of Storm-Related Restoration Costs
Docket No. UM 1817

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' ("AWEC") Motion to Admit Pre-filed Testimony and Exhibits in the above-referenced docket. Also enclosed is the supporting Declaration of Dr. Marc M. Hellman.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1817

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) MOTION TO ADMIT PRE-FILED
COMPANY,) TESTIMONY AND EXHIBITS OF THE
) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
Application for the Deferral of Storm-Related)
Restoration Costs.)

Pursuant to OAR 860-001-0420 and the Administrative Law Judge’s May 24, 2019 Ruling in the above-referenced docket, the Alliance of Western Energy Consumers (“AWEC”) moves for admission into the record of this proceeding the following pre-filed testimony and exhibits, submitted on behalf of AWEC:

Testimony & Exhibits	Description
AWEC/100	Reply Testimony of Dr. Marc M. Hellman
AWEC/101	Qualification Statement of Dr. Marc M. Hellman
AWEC/102	Company Responses to AWEC Data Requests
AWEC/103	2008-2017 Actual Level III Storm Damage Losses

The Declaration of Dr. Marc M. Hellman attesting to the truth and accuracy of the foregoing testimony and exhibit filings is attached.

Dated this 30th day of May, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the Alliance of

Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1817

In the Matter of

PORTLAND GENERAL ELECTRIC,

Application for the Deferral of Storm-Related
Restoration Costs.

DECLARATION OF
DR. MARC M. HELLMAN

I, MARC M. HELLMAN, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Marc M. Hellman. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers ("AWEC") in this matter.
2. I sponsored testimony and exhibit filings (AWEC/100-103) on behalf of AWEC in this matter.
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

SIGNED this 28th day of May, 2019.



MARC M. HELLMAN