

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UE 319**

4 In the Matter of

MOTION TO ADMIT EXHIBITS

5 PORTLAND GENERAL ELECTRIC  
6 COMPANY

7 Request for a General Rate Revision  
8

9 Staff of the Public Utility Commission of Oregon asks the Administrative Law Judge  
10 (ALJ) to admit the following pre-filed exhibits into the record in the above-captioned docket.  
11

12 <b>Staff Exhibit No.</b>	<b>Description/Title</b>
13 100	Opening Testimony of Scott Gibbens (NVPC)
14 101	Witness Qualification Statement (Gibbens)
15 102	PGE Wind Integration Study Phase 4
16 103	PGE Response to Staff DR No. 600
17 104	PGE Response to Staff DR No. 319
18 200	Opening Testimony of Lance Kaufman (NVPC)
19 201	Witness Qualification Statement (Kaufman)
20 202	PGE responses to data requests
21 203	Confidential PGE responses to data requests
22 204	Correlation of COB transactions and margins
23 205	Staff analysis of on-peak COB transactions and margins
24 206	BPA Report on Klondike 3
25 207	Carty Generating Station siting documents
26 208	Comparison of prices used to evaluate Wells PPA

1	209	Comparison of prices used to evaluate Wells PPA
2	210	Documentation of PGE wind facility investment
3	211	PGE workpaper re: transmission resale revenues
4	300	Opening Testimony of Rose Anderson (NVPC)
5	301	Witness Qualification Statement (Anderson)
6	302	PGE Responses to Staff DR No. 524 re: Need for storage capacity for Clatskanie Plants
7		
8	303	NW Natural's Rate Schedule 90 Service Agreement
9	304	PGE Response to Staff DR No. 556 regarding uses of gas at the North Mist Expansion Project
10	400	Opening Testimony of Marianne Gardner
11	401	Witness Qualification Statement (Gardner)
12	402	Uncollectibles
13	403	Wages, Salaries and Incentives
14	404	Escalation – Excerpt from Consumer Price Index – All Urban Consumers for the U.S. published by OEA (released November 16, 2016)
15		
16	405	Company Responses to Staff DR Nos. 288, 644, 294, 295, 296, 309, 430, 429, 407, 312, 313, 469, 470, 94, 92, and 425 and ICNU DR No. 48
17	406	Company Confidential Responses to Staff DR Nos. 68, 469 and ICNU DR 48
18	500	Opening Testimony of Matt Muldoon
19	501	Witness Qualification Statement (Muldoon)
20	502	Staff Peer Screening
21	503	Staff Three Stage DCF Modeling
22	504	Treasury Inflation Protected Securities (TIPS) Analysis
23	505	GDP Analysis with U.S. Bureau of Economic Analysis (BEA) Data
24	506	Staff CAPM Modeling
25	507	Confidential Cost of LT Debt Table & Maturity Profile
26	508	Merger and Acquisition Trends



1	509	Value Line (VL) Gas and Water Utility Profiles
2	510	Security Market Trends – News that Investors are Seeing
3	511	PGE’s March 2017 Investor Presentation
4	600	Opening Testimony of Phil Boyle
5	601	Witness Qualifications Statement (Boyle)
6	602	PGE’s response to Staff DR No. 160 showing annual transaction costs from September 2014 through January 2017
7		
8	603	Graph of Staff and PGE historical projection of transactions vs. actual transactions compared to test year projections
9	604	PGE’s response to Staff DR No. 162 showing 2018 test year monthly projected transaction costs
10		
11	605	Confidential PGE’s response to Staff DR. No. 353 showing monthly expected fee free bankcard adoption rate for the test period
12	606	Confidential Graph comparing Staff’s calculation of payment transactions to PGE projections
13		
14	607	Confidential Table comparing PGE’s projected test year transactions and Staff’s projected transactions
15	608	Confidential PGE’s response to Staff DR No. 159 showing expected test year transactions
16		
17	609	PGE response to Staff DR No. 356 answering why the cost per transaction has increased since the last rate case
18	700	Opening Testimony of Lance Kaufman
19	701	Responses to OPUC Data Requests
20	702	Port Westward Planned Outages Confidential
21	703	Hinge Fit Sensitivity Analysis
22	704	Residential Sales Forecast
23	705	Other Revenue Forecast Variance
24	706	Major Maintenance Accrual Balancing Accounts
25	800	Opening Testimony of Scott Gibbens
26	801	PGE Response to Staff DR No. 466

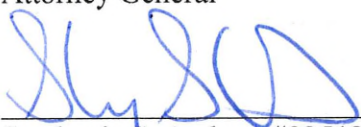
1	802	Calculation of Staff ELS Adjustment
2	900	Opening Testimony of Kathy Zarate
3	901	Witness Qualifications Statement (Zarate)
4	902	PGE Responses to Staff DR Nos. 165, 166, and 167 regarding gains on sales of utility property
5	903	PGE Responses to Standard DR No. 104 and Staff DR Nos. 169, 170, and 171 explaining advertising and marketing
6	904	PGE Responses to Standard DR Nos. 89 and 90 and Staff DR Nos. 222 and 223 regarding Dues, Donations, and Memberships
7	905	PGE Responses to Staff DR Nos. 224, 225, 226, and 227 relating to Research and Development
8	1000	Opening Testimony of Ming Peng
9	1001	Witness Qualifications Statement (Peng)
10	1100	Opening Testimony of Mitchell Moore
11	1101	Witness Qualifications Statement (Moore)
12	1102	PGE Response to Staff DR No. 139, Attachment A, excel file
13	1103	PGE Response to Staff DR No. 489 – Consultant review of CIS & MDM replacement CET project Confidential
14	1104	Company Response to Staff DR No. 623 – 2017 & 2018 O&M Budget memoranda
15	1105	Company Response to Staff DR Nos. 481, 504-523, 558
16	1106	Company Response to Staff DR No. 139 Attachment B Confidential
17	1200	Opening Testimony of Rose Anderson
18	1201	PGE Responses to Staff DR Nos. 527 and 367
19	1300	Opening Testimony of Max St. Brown
20	1301	Witness Qualifications Statement (Brown)
21	1302	Staff's load forecasting equations and figures
22	1303	Staff's confidential low services connection correction exhibits
23	1304	Reference materials related to load forecasting and temporary service



1	1305	PGE Responses to Staff DR Nos. 322, 331, 329, 321, 322, 348, 396, 532, 638, 637, 639, 538, 539, 434, 439, and a workpaper from PGE's Exhibit 1200
2	1400	Opening Testimony of George Compton
3	1401	Witness Qualifications Statement (Compton)
4	1402	Sample residential TOU scheduled used by a non-Oregon utility
5	1403	A detailed exhibit portraying the development of Staff's alternative TOU schedule
6	1404	PGE's responses to Staff Data Request Nos. 548 and 549
7	1500	Opening Testimony of Jean-Pierre Batmale
8	1501	Witness Qualifications Statement (Batmale)
9	1502	PGE Response to Staff DR Nos. 491 and 494
10	1600	Rebuttal Testimony of Lance Kaufman
11	1601	Exhibit in support of testimony
12	1700	Rebuttal Testimony of Max St. Brown
13	1800	Rebuttal Testimony of Marianne Gardner
14	1900	Cross-Answering Testimony of Max St. Brown
15		
16		

17 The testimony and witness qualifications statements are supported by the declarations of  
 18 Staff witnesses attached to this motion.

19 DATED this 20<sup>th</sup> day of October 2017.

21 Respectfully submitted,  
 22 ELLEN F. ROSENBLUM  
 23 Attorney General  
 24   
 25 Stephanie S. Andrus, #92512  
 26 Senior Assistant Attorney General  
 Of Attorneys for Staff of the Public Utility  
 Commission of Oregon

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY	)	DECLARATION OF
	)	MAX ST. BROWN
Request for a General Rate Revision	)	
_____	)	

I, Max St. Brown, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted rebuttal testimony for this docket pre-filed as Staff Exhibit 1700 and cross-answering testimony pre-filed as Staff Exhibit 1900 and my witness qualification statement, pre-filed as Staff Exhibit 1701. I also co-drafted joint testimony in support of the third stipulation in this case, filed as Stipulating Parties/300.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate, with the exception of an error in my opening testimony at page 19, in which I testify that Portland General Electric Company (PGE)'s large customer forecast is 3,169,916 MWh rather than the 3,184,028 MWh included in PGE's original filing.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 11 day of October 2017.



Max St. Brown

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY	)	DECLARATION OF
	)	MITCHELL MOORE
Request for a General Rate Revision	)	
_____	)	

I, Mitchell Moore, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Utility Analyst in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for this docket pre-filed as Staff Exhibit 1100, and drafted my witness qualification statement, pre-filed as Staff Exhibit 1101.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 2 day of October 2017.



\_\_\_\_\_  
Mitchell Moore



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

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

DECLARATION OF  
JEAN-PIERRE BATMALE

I, Jean-Pierre Batmale, state the following, under penalty of perjury in the State of Oregon:

1. I am the Acting Administrator for the Energy Resource and Planning Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for this docket pre-filed as Staff Exhibit 1500, and drafted my witness qualification statement, pre-filed as Staff Exhibit 1501.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 3<sup>rd</sup> day of October 2017.



JEAN-PIERRE BATMALE



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY	)	DECLARATION OF
	)	GEORGE COMPTON
Request for a General Rate Revision	)	
_____	)	

I, George Compton, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for this docket pre-filed as Staff Exhibit 1400, and drafted my witness qualification statement, pre-filed as Staff Exhibit 1401.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this \_\_\_\_ day of October 2017.

  
 \_\_\_\_\_  
 GEORGE COMPTON

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY	)	DECLARATION OF
	)	ROSE ANDERSON
Request for a General Rate Revision	)	
_____	)	

I, Rose Anderson, state the following, under penalty of perjury in the State of Oregon:

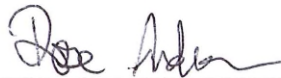
1. I am a Utility Analyst in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for the NVPC portion of this docket pre-filed as Staff Exhibit 300. I also drafted opening testimony for the general portion of this docket pre-filed as Staff Exhibit 1200. Finally, I drafted Staff Exhibit 301, which is my witness qualification statement.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 2<sup>nd</sup> day of October 2017.



Rose Anderson

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

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

DECLARATION OF  
MARIANNE GARDNER

I, Marianne Gardner, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Revenue Requirement Analyst in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening and rebuttal testimony pre-filed in this docket as Staff Exhibits 400 and 1800, and drafted Staff Exhibit 401, which is my witness qualification statement. I also co-drafted the Joint Supporting Testimony in Support of Stipulation, pre-filed as PGE[Stipulating Parties]/200, Gardner-Townsend-Jenks-Mullins-Brown.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 2 day of October 2017.



Marianne Gardner



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY	)	DECLARATION OF
	)	MATT MULDOON
Request for a General Rate Revision	)	
_____	)	

I, Matt Muldoon, state the following, under penalty of perjury in the State of Oregon:


1. I am a Senior Economist in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for this docket pre-filed as Staff Exhibit 500, and drafted my witness qualification statement, pre-filed as Staff Exhibit 501.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 2nd day of October 2017.



\_\_\_\_\_  
Matt Muldoon

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	DECLARATION OF
	)	SCOTT GIBBENS
Request for a General Rate Revision	)	
_____	)	

I, Scott Gibbens, state the following, under penalty of perjury in the State of Oregon:

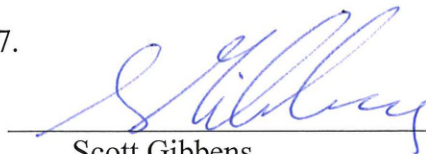
1. I am a Senior Economist in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for the NVPC portion of this docket pre-filed as Staff Exhibit 100, opening testimony for the general portion of this docket pre-filed as Staff Exhibit 800, and my witness qualification statement, pre-filed as Staff Exhibit 101. I also co-drafted Joint Testimony in Support of Stipulation for the NVPC portion of the case, pre-filed as Stipulating Parties/100.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 2nd day of October 2017.




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Scott Gibbens

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	DECLARATION OF
	)	MING PENG
Request for a General Rate Revision	)	
_____	)	

I, Ming Peng, state the following, under penalty of perjury in the State of Oregon:

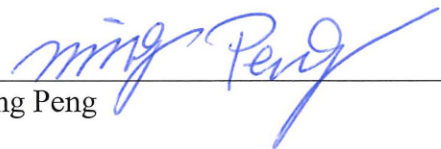
1. I am a Senior Economist in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for this docket pre-filed as Staff Exhibit 1000, and drafted my witness qualification statement, pre-filed as Staff Exhibit 1001.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 7<sup>nd</sup> day of October 2017.

  
 \_\_\_\_\_  
 Ming Peng



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY	)	DECLARATION OF
	)	PHIL BOYLE
Request for a General Rate Revision	)	
_____	)	

I, Phil Boyle, state the following, under penalty of perjury in the State of Oregon:

1. I am the Program Manager of the Consumer Services Section for the Public Utility Commission of Oregon Staff ("Staff").

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 600 and 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.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 2<sup>ND</sup> day of October 2017.



Phil Boyle

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	DECLARATION OF
	)	KATHY ZARATE
Request for a General Rate Revision	)	
_____	)	

I, Kathy Zarate, state the following, under penalty of perjury in the State of Oregon:

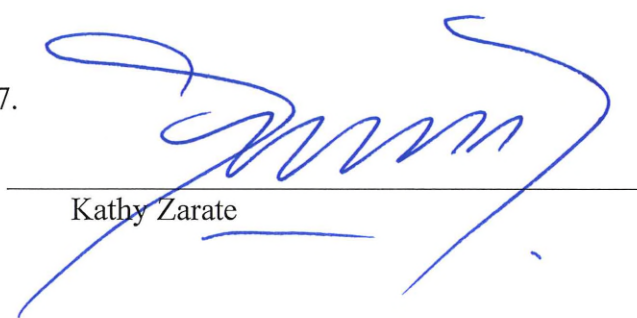
1. I am a Utility Economist in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for this docket pre-filed as Staff Exhibit 900, and drafted my witness qualification statement, pre-filed as Staff Exhibit 901.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 09 day of October 2017.




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Kathy Zarate

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 319

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY	)	DECLARATION OF
	)	LANCE KAUFMAN
Request for a General Rate Revision	)	
_____	)	

I, Lance Kaufman, state the following, under penalty of perjury in the State of Oregon:


1. I am a Senior Economist in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for the NVPC portion of this docket pre-filed as Staff Exhibit 200. I also drafted opening testimony for the general portion of this docket pre-filed as Staff Exhibit 700, and rebuttal testimony pre-filed as Staff Exhibit 1600. Finally, I drafted Staff Exhibit 201, which is my witness qualification statement.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 5 day of October 2017.



\_\_\_\_\_  
Lance Kaufman