

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

4 UM 1856

5 In the Matter of

6 PORTLAND GENERAL ELECTRIC
7 COMPANY,

8 Energy Storage Proposals and Revised
9 Energy Storage Potential Evaluation

STAFF'S CROSS-EXAMINATION
STATEMENT AND LIST OF PRE-FILED
EXHIBITS

10 Pursuant to Chief Administrative Law Judge Grant's December 4, 2017 Memorandum
11 indicating that all parties' cross-examination statements and exhibits be filed in this docket on
12 Friday, May 18, 2018, Staff of the Public Utility Commission of Oregon (Staff) submits this
13 cross-examination statement and list of pre-filed exhibits.

14 By way of background, the parties to this docket met for a settlement conference on
15 March 1, 2018. The parties¹ reached a settlement of all issues in this docket except for one,
16 which the parties agreed to litigate using the existing procedural schedule. The single remaining
17 issue for litigation is whether PGE should be required to allow third-party ownership options for
18 the Coffee Creek energy storage pilot project in the RFP that it will issue for the project.

19 Staff waives its right to cross-examination at the May 30, 2018 hearing on this single
20 remaining issue. However, Staff continues to reserve the right to ask follow-up questions of any
21 witness who is cross-examined by another party, the Administrative Law Judge, or any
22 Commissioner. At the hearing, Staff intends to move the following pre-filed exhibits into the
23 record:

24 ///

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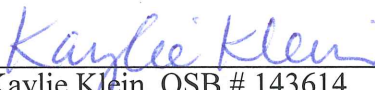
26 ¹ Community Renewable Energy Association (CREA) and the Oregon Department of Energy (ODOE) did not attend the settlement conference; however, the stipulation was circulated to CREA and ODOE for review. CREA and ODOE have declined to join the stipulation, but have both indicated that they do not object to the stipulation.

Pre-Filed Exhibit	Description
Staff/100	Reply Testimony of Seth Wiggins
Staff/101	Witness Qualification Statement of Seth Wiggins
Staff/102-103	PGE Responses to Staff Data Requests
Staff/200	Surrebuttal Testimony of Seth Wiggins on whether PGE should be required to allow third-party ownership options for the Coffee Creek pilot project in its RFP

DATED this 18th day of May, 2018.

Respectfully submitted,

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Attorney General



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Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon