



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

August 16, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 1857—Motion to Admit Testimony and Witness Declarations

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket the Motion to Admit Testimony, corresponding Stipulation, and Exhibits and witness declarations of Amy McCluskey, Seth Wiggins, and William Gehrke.

If you have any questions about this filing, please contact Natasha Siores at (503) 813-6583.

Sincerely,

Etta Lockey
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1857

In the Matter of:

PACIFICORP d/b/a PACIFIC POWER

Draft Storage Potential Evaluation.

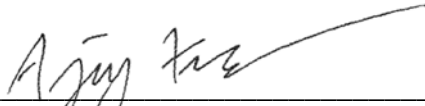
**MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS**

In accordance with OAR 860-001-0420, PacifiCorp d/b/a Pacific Power (PacifiCorp) moves for the following to be admitted into the record in this proceeding:

- (1) Joint Testimony in Support of the Stipulation (Stipulating Parties/100) and corresponding Stipulation;
- (2) Supplemental Joint Testimony in Support of the Stipulation (Stipulating Parties/101-103).

This motion is supported by the declarations of Amy McCluskey, Seth Wiggins, and William Gehrke attesting that their pre-filed testimony and exhibits are true and correct.

Respectfully submitted this 16th day of August, 2018.



Ajay Kumar (admitted *Pro Hac Vice*)
Matthew McVee
PacifiCorp d/b/a Pacific Power

Attorneys for PacifiCorp

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1857

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Draft Storage Potential Evaluation.

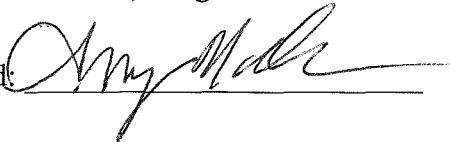
**DECLARATION OF
AMY MCCLUSKEY**

1 I, AMY MCCLUSKEY, declare under penalty of perjury under the laws of the state of
2 Oregon:

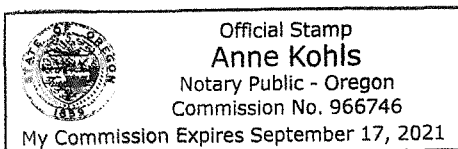
- 3 1. My name is Amy McCluskey. I am employed by PacifiCorp d/b/a Pacific Power
4 (PacifiCorp) as Manager, Asset Strategy and Policy.
5 2. I am the same Amy McCluskey who previously filed testimony on behalf of
6 PacifiCorp in this matter (Stipulating Parties/100-101).
7 3. My pre-filed testimony and exhibits are true and accurate based on my
8 information and belief.

9 I hereby declare that the above statement is true to the best of my knowledge and belief,
10 and that I understand it is made for use as evidence before the Public Utility Commission of
11 Oregon and is subject to penalty for perjury.

12 SIGNED this 13 day of August, 2018, at Portland, Oregon.

Signed: 

SUBSCRIBED AND SWORN to before me this 13 day of August, 2018.





NOTARY PUBLIC

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

4 UM 1857

5 In the Matter of
6 PACIFICORP d/b/a PACIFIC POWER,
7 Draft Storage Potential Evaluation.
8 _____

DECLARATION OF SETH WIGGINS

9 I, Seth Wiggins, declare under penalty of perjury under the laws of the State of Oregon:

10 1. My name is Seth Wiggins. I am employed by the Public Utility Commission of
11 Oregon as a Senior Utility Analyst in the Energy Resources and Planning Division.

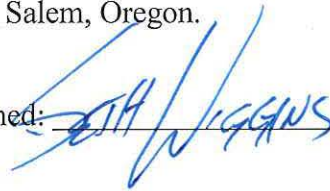
12 2. I am the same Seth Wiggins who contributed to the Joint Testimony in Support of
13 Stipulation and provided Staff's Witness Qualification Statement.

14 3. My contributions to the Joint Testimony in Support of Stipulation and Witness
15 Qualification Statement are true and accurate based on my knowledge and belief.

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

18 SIGNED this 10th day of August, 2018 at Salem, Oregon.

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20 Signed: _____
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1857**

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC)	DECLARATION OF WILLIAM GEHRKE
POWER,)	
)	
Draft Storage Potential)	
Evaluation.)	
_____)	

I, William Gehrke declare under penalty of perjury under the laws of the State of Oregon:

1. My name is William Gehrke. I am an Economist for the Oregon Citizens' Utility Board of Oregon (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205.
2. I am the same William Gehrke who contributed to the Joint Testimony in Support of the Stipulation and provided CUB's Witness Qualification Statement.
3. My contributions to the Joint Testimony in Support of Stipulation and Witness Qualification Statement are true and accurate based on my knowledge and belief.

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 14th day of August, 2018.



William Gehrke, Economist
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
T. 503.227.1984 x 14
E. will@oregoncub.org