

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

3 UM 1897

4 In the Matter of

5 HYRDO ONE LIMITED,

6 Application for Authorization to Exercise
7 Substantial Influence over the Policies and
8 Actions of AVISTA CORPORATION.

STAFF'S MOTION TO ADMIT
PRE-FILED TESTIMONY AND EXHIBITS

9 Public Utility Commission of Oregon staff (Staff) moves for the admission of the following
10 pre-filed Staff testimony and supporting exhibits into the record as evidence in this proceeding:

11

12 Witness	Exhibit(s)	Title	Date Filed
13 Muldoon	Staff/100, Staff/200-205	Staff Reply Testimony	2/12/18
14	Staff/600-604	Staff Reply Testimony to Supplemental Testimony	9/20/18
15	Staff/800-803	Staff Surrebuttal Testimony to Supplemental Testimony	10/18/18
16 Anderson	Staff/500-511	Staff Reply Testimony	2/12/18
17	Staff/700-704	Staff Reply Testimony to Supplemental Testimony	9/20/18
18	Staff/900	Staff Surrebuttal Testimony to Supplemental Testimony	10/18/18
19 Gardner	Staff/300-302	Staff Reply Testimony	2/12/18
20 Zarate	Staff/400-406	Staff Reply Testimony	2/12/18

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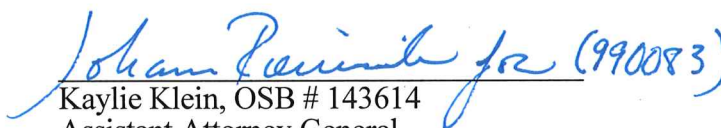
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1 Attached with this motion are the Declarations of Matt Muldoon, Rose Anderson,
2 Marianne Gardner, and Kathy Zarate attesting to the truthfulness of their pre-filed testimony and
3 supporting exhibits.

4 DATED this 28 day of November 2018.

5 Respectfully submitted,

6 ELLEN F. ROSENBLUM
7 Attorney General

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9 Kaylie Klein, OSB # 143614
10 Assistant Attorney General
11 Of Attorney for Staff of the Public Utility
12 Commission of Oregon
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DECLARATION OF MATT MULDOON

10 I, Matt Muldoon, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is Matt Muldoon. I am employed by the Public Utility Commission of
12 Oregon as a Senior Economist in the Energy Rates, Finance, and Audit Division.

13 2. I am the same Matt Muldoon who prepared the following pre-filed testimony and
14 supporting exhibits in this docket:

- 15 • Staff/100 and Staff/200-205 – Staff Reply Testimony, filed on 2/12/18;
- 16 • Staff contribution to the Joint Testimony in Support of Stipulation, filed on
17 6/19/18;
- 18 • Staff/600-604 – Staff Reply Testimony to Supplemental Testimony, filed on
19 9/20/18;
- 20 • Staff/800-803 – Staff Surrebuttal Testimony to Supplemental Testimony, filed
21 on 10/18/18.

22 3. My pre-filed testimony and supporting exhibits identified above, and my
23 contributions to the Joint Testimony in Support of Stipulation, are true and accurate based on my
24 knowledge and belief.

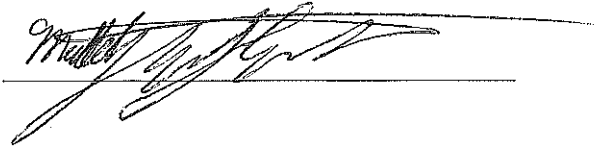
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1 I hereby declare that the above statement is true to the best of my knowledge and belief,
2 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.
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4 SIGNED this 26 day of November, 2018 at Salem, Oregon.

5 Signed: _____
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DECLARATION OF ROSE ANDERSON

10 I, Rose Anderson, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is Rose Anderson. I am employed by the Public Utility Commission of
12 Oregon as a Utility Analyst.

13 2. I am the same Rose Anderson who prepared the following pre-filed testimony and
14 supporting exhibits in this docket:

- 15 • Staff/500-511 – Staff Reply Testimony, filed on 2/12/18;
- 16 • Staff contribution to the Joint Testimony in Support of Stipulation, filed on
17 6/19/18;
- 18 • Staff/700-704 – Staff Reply Testimony to Supplemental Testimony, filed on
19 9/20/18;
- 20 • Staff/900 – Staff Surrebuttal Testimony to Supplemental Testimony, filed on
21 10/18/18.

22 3. My pre-filed testimony and supporting exhibits identified above, and my
23 contributions to the Joint Testimony in Support of Stipulation, are true and accurate based on my
24 knowledge and belief.


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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 28th day of November, 2018 at Salem, Oregon.

Signed: 

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DECLARATION OF MARIANNE GARDNER

10 I, Marianne Gardner, declare under penalty of perjury under the laws of the State of
11 Oregon:

12 1. My name is Marianne Gardner. When I prepared my pre-filed testimony in this
13 docket, I was employed by the Public Utility Commission of Oregon as a Senior Revenue
14 Requirement Analyst in the Energy Rates, Finance, and Audit Division.¹

15 2. I am the same Marianne Gardner who prepared Staff/300-302 – Staff Reply
16 Testimony and supporting exhibits, filed on 2/12/18.

17 3. My pre-filed Reply Testimony and supporting exhibits identified above are true and
18 accurate based on my knowledge and belief.

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

21 SIGNED this 26 day of November, 2018 at Salem, Oregon.

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23 Signed: Marianne Gardner

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¹ Since that time my title has changed to Program Manager of Rates and Accounting.

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DECLARATION OF KATHY ZARATE

10 I, Kathy Zarate, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is Kathy Zarate. I am employed by the Public Utility Commission of
12 Oregon as an Economist Analyst in the Energy Rates, Finance, and Audit Division.

13 2. I am the same Kathy Zarate who prepared Staff/400-406 – Staff Reply Testimony
14 and supporting exhibits, filed on 2/12/18.

15 3. My pre-filed Reply Testimony and supporting exhibits identified above are true and
16 accurate based on my knowledge and belief.

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

19 SIGNED this 26 day of November, 2018 at Salem, Oregon.

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21 Signed: 
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