

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **PCN 2**

4 In the Matter of:

5 Tillamook People's Utility District, Petition
6 for Certification Of Public Convenience And
7 Necessity

MOTION TO ADMIT PRE-FILED STAFF
TESTIMONY

8
9 Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law
10 Judge to admit the following pre-filed exhibits into the record in the above-captioned docket:

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12 Exhibit No.	Exhibit
13 Staff Exhibit 100	Testimony of Scott Gibbens
14 Staff Exhibit 101	Witness Qualification Statement of Scott Gibbens
15 Staff Exhibit 102	TPUD's Response to Staff Data Request No. 5
16 Staff Exhibit 103	TPUD's Response to Staff Data Request No. 36
17 Staff Exhibit 104	TPUD's Response to Staff Data Request No. 18(a)
18 Staff Exhibit 105	TPUD's Response to Staff Data Request No. 3
19 Staff Exhibit 106	TPUD's Response to Staff Data Request No. 8
20 Staff Exhibit 107	TPUD's Response to Staff Data Request No. 6
21 Staff Exhibit 108	TPUD's Response to Staff Data Request No. 11
22 Staff Exhibit 109	TPUD's Response to Staff Data Request No. 43
23 Staff Exhibit 110	State Planning Goals
24 Staff Exhibit 111	Excerpt from TPUD's Response to Staff Data Request No. 44
25 Staff Exhibit 200	Testimony of Nadine Hanhan

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1	Staff Exhibit 201	Witness Qualification Statement of Nadine Hanhan
2	Staff Exhibit 202	TPUD's Response to Staff Data Request No. 27
3	Staff Exhibit 203	Excerpt from TPUD's Response to Staff Data Request No. 44
4	Staff Exhibit 204	TPUD's Response to Staff Data Request No. 13
5	Staff Exhibit 205	Excerpt from TPUD's Supplemental Response to Staff Data Request No. 23
6	Staff Exhibit 206	TPUD's Response to Staff Data Request No. 30
7	Staff Exhibit 300	Cross-Answering and Reply Testimony of Scott Gibbens
8	Staff Exhibit 301	TPUD's Response to Staff Data Request No. 13
9	Staff Exhibit 302	TPUD's Response to Staff Data Request Nos. 1 and 10
10	Staff Exhibit 303	Excerpt from TPUD Response to Staff Data Request No. 39
11	Staff Exhibit 304	Excerpt from TPUD Response to Staff Data Request No. 44
12	Staff Exhibit 305	TPUD Response to Staff Data Request No. 46-1
13	Staff Exhibit 400	Cross-Answering and Reply Testimony of Nadine Hanhan
14	Staff Exhibit 401	TPUD Narrative Response to Staff Data Request Nos. 45-52
15	Staff Exhibit 402	TPUD Narrative Response to Staff Data Request No. 18
16	Staff Exhibit 403	TPUD Narrative Response to Staff Data Request No. 28
17	Staff Exhibit 404	BPA 2011 Load Forecast for Tillamook PUD
18	Staff Exhibit 405	BPA 2012 Load Forecast for Tillamook PUD
19	Staff Exhibit 406	BPA 2013 Load Forecast for Tillamook PUD
20	Staff Exhibit 407	BPA 2014 Load Forecast for Tillamook PUD
21	Staff Exhibit 408	BPA 2015 Load Forecast for Tillamook PUD
22	Staff Exhibit 409	BPA 2016 Load Forecast for Tillamook PUD
23	Staff Exhibit 410	BPA 2017 Load Forecast for Tillamook PUD
24	Staff Exhibit 411	BPA 2018 Load Forecast for Tillamook PUD
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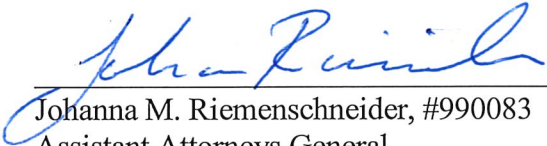
1 Staff Exhibit 412	TPUD Narrative Response to Staff Data Request No. 32
2 Staff Exhibit 413	TPUD Attachment to Staff Data Request No. 32

3 This Motion to Admit Pre-Filed Staff Testimony is supported by the affidavits of Staff
4 witnesses Scott Gibbens and Nadine Hanhan that attest to the truthfulness of their testimony.
5 The Affidavits are attached to this motion.

6 DATED this 7th day of September 2018.

7 Respectfully submitted,

8 ELLEN F. ROSENBLUM
9 Attorney General

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11 Johanna M. Riemenschneider, #990083
12 Assistant Attorneys General
13 Of Attorneys for Staff of the Public Utility
14 Commission of Oregon

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

PCN 2

In the Matter of)
)
TILLAMOOK PEOPLE'S UTILITY)
DISTRICT,)
)
Petition for Certification of Public)
Convenience and Necessity.)
_____)

DECLARATION OF
SCOTT GIBBENS

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

1. I am a Senior Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibits 100 and Exhibit 101 (witness qualification statement). I also drafted the pre-filed cross-answering and reply testimony submitted for use in this docket as Staff Exhibit 300.

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 4th day of September 2018.



Scott Gibbens

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

PCN 2

In the Matter of)	
)	
TILLAMOOK PEOPLE'S UTILITY)	
DISTRICT,)	DECLARATION OF
)	NADINE HANHAN
Petition for Certification of Public)	
Convenience and Necessity.)	
_____)	

I, Nadine Hanhan, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy, Resources and Planning Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 200 and Exhibit 201 (witness qualification statement). I also drafted the pre-filed cross-answering and reply testimony submitted for use in this docket as Staff Exhibit 400.

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 4th day of September 2018.



Nadine Hanhan