

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

3 **UE 420**

4 In the Matter of  
5 PACIFICORP, dba PACIFIC POWER,  
6 2024 Transition Adjustment Mechanism.  
7

**STAFF MOTION TO ADMIT TESTIMONY**

8 Staff of the Oregon Public Utility Commission moves the Administrative Law Judge to  
9 admit the following Staff exhibits into the record in the above-captioned proceeding.  
10

Exhibit No.	Description
Staff 100	Opening testimony of Anna Kim
Staff 101	Witness Qualifications Statement of Anna Kim
Staff 102	PacifiCorp responses to Staff data requests
Staff 200	Opening Testimony of Julie Jent
Staff 201	Witness Qualifications Statement of Julie Jent
Staff 202	PacifiCorp responses to Staff data requests
Staff 203	Confidential PacifiCorp responses to Staff data requests
Staff 300	Opening Testimony of Curtis Dlouhy
Staff 301	Witness Qualifications Statement of Curtis Dlouhy
Staff 302	PacifiCorp responses to Staff Data Requests
Staff 303	Market Cap Methodology Comparison
Staff 304	Western EIM Benefits and Benefits Methodology
Staff 400	Opening Testimony of Rose Anderson
Staff 401	Witness Qualifications Statement of Rose Anderson
Staff 402	Confidential exhibit in support of testimony
Staff 500	Opening Testimony of Madison Bolton
Staff 501	Witness Qualifications Statement of Madison Bolton
Staff 502	PacifiCorp's Reply to Staff Data Request No. 76
Staff 600	Opening Testimony of Itayi Chipanera
Staff 601	Witness Qualifications Statement of Itayi Chipanera
Staff 700	Rebuttal Testimony of Anna Kim
Staff 701	Coal-fired Thermal Report
Staff 800	Rebuttal Testimony of Julie Jent
Staff 900	Rebuttal Testimony of Curtis Dlouhy
Staff 1000	Rebuttal Testimony of Rose Anderson
Staff 1001	Highly Confidential exhibit in support of testimony
Staff 1100	Rebuttal Testimony of Madison Bolton
Staff 1200	Rebuttal Testimony of Itayi Chipanera





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**UE 420**

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PACIFICORP, dba PACIFIC POWER,  
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**DECLARATION OF JULIE JENT**


I, JULIE JENT, state the following, under penalty of perjury in the State of Oregon:

- 1. I am a Senior Utility Analyst in the Energy Costs Section of the Rates, Safety and Utility Performance Division of the Oregon Public Utility Commission.
- 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the above-captioned docket pre-filed as Staff Exhibits 200 and 800 and drafted a witness qualifications statement, pre-filed as Staff Exhibit 201.

To the best of my knowledge, the pre-filed testimony in Staff Exhibits 200 and 800 and my witness qualifications statement in Staff Exhibit 201 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<sup>th</sup> day of September, 2023.

  
 \_\_\_\_\_  
 JULIE JENT

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
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3 **UE 420**

4 In the Matter of  
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6 2024 Transition Adjustment Mechanism.

**DECLARATION OF CURTIS DLOUHY**

7 I, CURTIS DLOUHY, state the following, under penalty of perjury in the State of Oregon:

- 8 1. I am an Economist within the Strategy and Integration (SI) Division of the  
9 Oregon Public Utility Commission.
- 10 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
11 above-captioned docket pre-filed as Staff Exhibits 300 and 900 and drafted a witness  
12 qualifications statement, pre-filed as Staff Exhibit 301.

13 To the best of my knowledge, the pre-filed testimony in Staff Exhibits 300 and 900 and  
14 my witness qualifications statement in Staff Exhibit 301 are true and accurate.

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

19 SIGNED this 5<sup>th</sup> day of September, 2023.

20  
21 *Curtis Dlouhy*  
22 CURTIS DLOUHY

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4     In the Matter of  
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**DECLARATION OF ROSE ANDERSON**

7     I, ROSE ANDERSON, state the following, under penalty of perjury in the State of Oregon:

8             1.        I am a Senior Economist employed in the Rates, Safety and Utility Performance  
9     Division of the Oregon Public Utility Commission.

10            2.        On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
11     above-captioned docket pre-filed as Staff Exhibits 400 and 1000 and drafted a witness  
12     qualifications statement, pre-filed as Staff Exhibit 401.

13            To the best of my knowledge, the pre-filed testimony in Staff Exhibits 400 and 1000, as  
14     corrected by an errata filed on August 31, 2022, and my witness qualifications statement in Staff  
15     Exhibit 401 are true and accurate.

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

20            SIGNED this 5<sup>th</sup> day of September, 2023.

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22                                    *Rose Anderson*  
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24                                    ROSE ANDERSON

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**DECLARATION OF MADISON BOLTON**

7 I, MADISON BOLTON, state the following, under penalty of perjury in the State of Oregon:

8 1. I am a Senior Energy and Policy Analyst in the Strategy and Integration Division  
9 of the Oregon Public Utility Commission.

10 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
11 above-captioned docket pre-filed as Staff Exhibits 500 and 1100 and drafted a witness  
12 qualifications statement, pre-filed as Staff Exhibit 501.

13 To the best of my knowledge, the pre-filed testimony in Staff Exhibits 500 and 1100 and  
14 my witness qualifications statement in Staff Exhibit 501 are true and accurate.

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

19 SIGNED this 5<sup>th</sup> day of September, 2023.

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21 *Madison Bolton*  
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23 MADISON BOLTON  
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**DECLARATION OF ITAYI CHIPANERA**

7        I, ITAYI CHIPANERA, state the following, under penalty of perjury in the State of Oregon:

8             1.        I am a Senior Financial Analyst in the Accounting and Finance Section of the  
9        Rates, Safety, and Utility Performance Division of the Oregon Public Utility Commission.

10            2.        On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
11        above-captioned docket pre-filed as Staff Exhibits 600 and 1200 and drafted a witness  
12        qualifications statement, pre-filed as Staff Exhibit 601.

13            To the best of my knowledge, the pre-filed testimony in Staff Exhibits 600 and 1200 and  
14        my witness qualifications statement in Staff Exhibit 601 are true and accurate.

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

19            SIGNED this 5<sup>th</sup> day of September, 2023.

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21                                      
22                                    ITAYI CHIPANERA