	OF OI	REGON		
PCN 1				
In the Matter of:	а.,	MOTION TO ADMIT PRE-FILED STAFF		
Umatilla Electric Co	ooperative Certification Of	TESTIMONY		
Public Convenience And Necessity				
Staff of the l	Public Utility Commission c	f Oregon (Staff) asks the Administrative Law		
Judge to admit the f	ollowing pre-filed exhibits i	nto the record in the above-captioned docket:		
Exhibit No.	Exhibit			
Staff Exhibit 100	Testimony of Geoffrey Ihle			
Staff Exhibit 101	Witness Qualification Statement of Geoffrey Ihle			
Staff Exhibit 102	UEC's Responses to Staff Data Requests			
Staff Exhibit 103	Land Use Guidelines			
Staff Exhibit 200	Testimony of Scott Gibbens			
Staff Exhibit 201	Witness Qualification Statement of Scott Gibbens			
Staff Exhibit 202	UEC's Response to Staff DR 2, 14, 16, 26, 30, 34, 36			
	UEC's Electrical Facility Inspection Policy, Line Inspection Policy, and Safety Manual			
Staff Exhibit 203	UEC's Response to Staff DR 7, 9, 10			
Staff Exhibit 203 Staff Exhibit 204	UEC s Response to Star	21(1, 5, 10		

23 Geoffrey Ihle and Scott Gibbens that attest to the truthfulness of their testimony. The Affidavits

24 are attached to this motion.

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Page 1 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (PCN 1) JMR/mxg/7864883

1	DATED this 28 th day of November 2016	j.
2		Respectfully submitted,
3		ELLEN F. ROSENBLUM Attorney General
5		Inter Rimile
6		Johanna M. Riemenschneider, #990083
7		Sommer Moser, #105260 Assistant Attorneys General
8		Of Attorneys for Staff of the Public Utility Commission of Oregon
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Page 2 -	MOTION TO ADMIT PRE-FILED STAF JMR/mxg/7864883	F TESTIMONY (PCN 1)

1	BEFORE THE PUBLIC UTILITY COMMISION OF OREGON				
2	PCN 1				
3	In the Matter of:				
4	Umatilla Electric Cooperative Certification Of AFFIDAVIT OF GEOFFREY IHLE				
5	Public Convenience And Necessity				
6	STATE OF OREGON)) ss				
7	County of Marion)				
8	I, Geoffrey Ihle, hereby depose and say:				
9	1. I am a Senior Economist employed by the Public Utility Commission of Oregon				
10	("Commission"). I work in the Commission's Energy Rates, Finance and Audit Division.				
11	2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as				
12	Staff Exhibit 100, along with Staff Exhibit 101 (witness qualification statement).				
13	To the best of my knowledge, my pre-filed testimony and witness qualification statement				
14	are true and accurate.				
15	DATED this 22nd day of November 2016.				
16	Sip/c/h.				
17	GEOFFREY IHLE				
18	SUBSCRIBED AND SWORN TO before me this 22 day of November 2016.				
19	SUBSCRIBED AND SWORN TO before the this <u>0, or</u> day of <u>10 pl/ember</u> 2016				
20					
21	OFFICIAL STAMP CANDICE JANE MENZA NOTARY PUBLIC - OREGON NOTARY PUBLIC FOR OREGON				
22	COMMISSION NO. 932882				
23	MY COMMISSION EXPIRES OCTOBER 01, 2018 My Commission Expires: October (12018)				
24					
25					
26					
Page	Page 1 – AFFIDAVIT OF GEOFFREY IHLE				

JLM/mxg/7864829

Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 947-4520 / Fax: (503) 378-3784

1	BEFORE THE PUBLIC UTILITY COMMISION OF OREGON			
2	PCN 1			
3	In the Matter of:			
4	Umatilla Electric Cooperative Certification Of Public Convenience And Necessity			
5				
6	STATE OF OREGON)) ss			
7	ounty of Marion)			
8	I, Scott Gibbens, hereby depose and say:			
9	1. I am a Senior Economist employed by the Public Utility Commission of Oregon			
10	("Commission"). I work in the Commission's Energy Rates, Finance and Audit Division.			
11	2. On behalf of Commission Staff, I drafted testimony that was pre-filed in this docket as			
12	Staff Exhibit 200, along with Staff Exhibit 201 (witness qualification statement).			
13	To the best of my knowledge, my pre-filed testimony and witness qualification statement			
14	are true and accurate.			
15	DATED this <u>22</u> day of <u>November</u> 2016.			
16	2 St. Ol			
17	SCOTT GIBBENS			
18	SUBSCRIBED AND SWORN TO before me this 22 day of November 2016.			
19	SUBSCRIBED AND SWORN TO before the unscreene day of <u>MAVEMOR</u> 2010.			
20	OFFICIAL STAMP			
21	NOTARY PUBLIC - OREGON			
22	MY COMMISSION EXPIRES OCTOBER 01, 2018			
23	My Commission Expires: October 1,2018			
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26				
Page	Page 1 – AFFIDAVIT OF SCOTT GIBBENS			

JLM/mxg/7864949

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