

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1722**

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	OREGON CITIZENS' UTILITY BOARD
OREGON,)	MOTION TO ADMIT PRE-FILED
)	TESTIMONY
Investigation into Recovery of Safety Costs by)	
Natural Gas Utilities.)	
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The Oregon Citizens' Utility Board ("CUB") respectfully requests that Administrative Law Judge Rowe admit CUB's Pre-filed Testimony in this docket: CUB's Testimony: McGovern (CUB/100-101, CUB/200). The above-referenced testimony was previously filed with the Commission and supports CUB's testimony in this docket. The declaration of Jaime McGovern attesting to the truthfulness of these exhibits is attached to this Motion.

Dated this 23rd day of February, 2017.

Respectfully submitted,



Michael P. Goetz, OSB # 141465
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1722**

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	DECLARATION OF
OREGON,)	JAIME MCGOVERN
)	
Investigation into Recovery of Safety Costs by)	
Natural Gas Utilities.)	
_____)	

I, Jaime McGovern, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Jaime McGovern. I am a Senior Economist for the Oregon Citizens' Utility Board ("CUB"). My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205.
2. I sponsored pre-filed Opening and Reply Testimony in this docket, CUB/100-101, CUB/200, on behalf of CUB.
3. My testimony that was previously filed is true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.

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 23rd day of February, 2017.

Signed: _____

