

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1953

In the Matter of)) PORTLAND GENERAL ELECTRIC) COMPANY)) Investigation into Proposed Green Tariff) Phase II)))))))	SUPPLEMENT TO CROSS- EXAMINATION STATEMENT and CROSS-EXAMINATION EXHIBITS OF NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITION
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Pursuant to Administrative Law Judge (“ALJ”) Memorandum and Ruling of September 25, 2020, the Northwest and Intermountain Power Producers Coalition (“NIPPC”) submits this supplement to its cross-examination statement for the Commission hearing scheduled on October 8, 2020 to provide additional specificity with respect to the specific pages of pre-filed testimony NIPPC anticipates addressing during the hearing as part of its cross examination.¹

As previously noted in its Cross Examination Statement, NIPPC anticipates cross examining the panel of witnesses provided by Portland General Electric Company (“PGE”), consisting of Karla Wenzel, Josh Halley and Brian Faist (the “PGE Panel”) with respect to PGE testimony including PGE/500, PGE/600-606, PGE/700-703 and PGE/800-802, as well as with respect to the data responses identified by NIPPC in its cross examination statement.

NIPPC anticipates focusing its cross-examination on the following specific sections of testimony:

PGE Pre-filed Testimony	Anticipated pages
PGE/500	pages 1, 6-7, 11-15, 21-24, 28-34
PGE/600 (also included in the record as PGE/701)	pages 14-34 and 39-42
PGE/700	page 2 and pages 15-18
PGE/800	Pages 9-48
PGE/801	p. 1-3

¹ See September 25, 2020 Memorandum and Ruling, Docket UM 1953, page 2: “Parties do not need to provide copies of any prefiled testimony, only to name the pages of the exhibits or materials that they plan to reference. Any party intending to offer any exhibits or rely on any other documents for reference during the hearing must provide those documents in pdf format to all parties, the undersigned as assigned ALJ, and the assigned support staff person, on or before October 2, 2020. To the extent that the need to reference materials not previously identified arises during the course of the hearing, we may need to rely on email to ensure that all parties have access to the referenced materials.”

NIPPC is providing this information in good faith and to facilitate the Presiding Administrative Law Judge's ability to conduct an efficient remote hearing. NIPPC reserves the right to cross examine the PGE Panel with respect to other areas of PGE's pre-filed testimony and exhibits as may be appropriate based on information garnered leading up to and in the course of the hearing.

DATED this 2nd day of October, 2020.

Respectfully submitted,

/s/ Carl Fink

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