

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
Suite 450  
1750 SW Harbor Way  
Portland, OR 97201

August 27, 2019

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: In the Matter of PACIFICORP, dba PACIFIC POWER  
2019 Renewable Adjustment Clause  
**Docket No. UE 352**

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Motion to Admit Pre-filed Testimony and Exhibits in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 352**

In the Matter of )  
PACIFICORP, dba PACIFIC POWER )  
2019 Renewable Adjustment Clause. )  
\_\_\_\_\_ )  
) MOTION TO ADMIT PRE-FILED  
) TESTIMONY AND EXHIBITS OF THE  
) ALLIANCE OF WESTERN ENERGY  
) CONSUMERS

The Alliance of Western Energy Consumers (“AWEC”) moves for admission into the record of this proceeding the following pre-filed testimony and exhibits submitted on behalf of AWEC.

<u>Exhibit</u>	<u>Description</u>
AWEC/100	Opening Testimony of Bradley G. Mullins
AWEC/101	Qualification Statement of Bradley G. Mullins
AWEC/102	PacifiCorp Responses to Data Requests
AWEC/103	Impact of Accumulated Depreciation on Rate Base
AWEC/104	ORS 757.140(2) Regulatory Asset Amortization
AWEC/105	ORS 757.140(2) Regulatory Asset Amortization Using ROR

<u>Exhibit</u>	<u>Description</u>
AWEC/200	Rebuttal and Cross-Answering Testimony of Bradley G. Mullin
Confidential AWEC/201	Declining Rate Base: UE 263 to Repowering Dates
AWEC/202	ORS 757.140(2) – Regulatory Asset Amortization
AWEC/203	ORS 757.140(2) – Regulatory Asset Amortization Using ROR
AWEC/204	ORS 757.140(2) – Regulatory Asset Amortization With 20-Yr. Amortization Period
Confidential AWEC/205	PacifiCorp Responses to Data Requests
Stipulating Parties/100	Joint Testimony of Stipulating Parties

The Affidavit of Bradley G. Mullins attesting to the truth and accuracy of his testimony and exhibit filings, as well as his testimony in support of the stipulation filed in this proceeding, is attached.

Dated this 27th day of August, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 352**

In the Matter of ) AFFIDAVIT OF BRADLEY G. MULLINS  
)  
PACIFICORP, dba PACIFIC POWER )  
)  
2019 Renewable Adjustment Clause. )  
\_\_\_\_\_ )

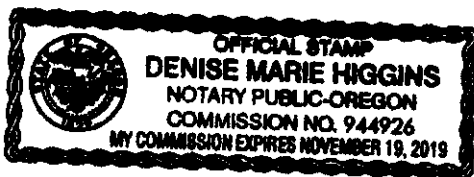
I, BRADLEY G. MULLINS, being first duly sworn on oath, depose and say:

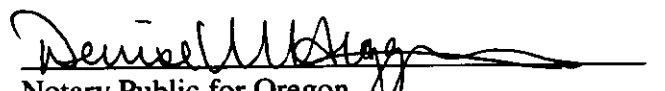
1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers ("AWEC") in this matter.
2. I sponsored testimony and exhibit filings (AWEC/100-105, AWEC/200-205, and Stipulating Parties/100) on behalf of AWEC and the Stipulating Parties in this matter.
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 19 day of August, 2019.

  
\_\_\_\_\_  
BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 19 day of August, 2019.



  
\_\_\_\_\_  
Notary Public for Oregon  
My Commission Expires: Nov 19 2019