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October 25, 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 PORTLAND GENERAL ELECTRIC COMPANY,

Advice No. 19-02, New Load Direct Access Program.

Docket No. UE 358

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 358

In the Matter of)	MOTION TO ADMIT PRE-FILED
)	TESTIMONY AND EXHIBITS OF THE
PORTLAND GENERAL ELECTRIC)	ALLIANCE OF WESTERN ENERGY
COMPANY,)	CONSUMERS
)	
Advice No. 19-02, New Load Direct Access)	
Program.)	

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	Reply Testimony of Bradley G. Mullins
AWEC/101	Qualification Statement of Bradley G. Mullins
AWEC/102	PGE Responses to Data Requests
AWEC/200	Rebuttal and Cross-Answering Testimony of Bradley G. Mullins
AWEC/201	PGE Responses to Data Requests

The Affidavit of Bradley G. Mullins attesting to the truth and accuracy of his testimony and exhibit filings is attached.

PAGE 1 – MOTION TO ADMIT OF AWEC

Dated this 25th day of October, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/Tyler C. Pepple
Tyler C. Pepple
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Of Attorneys for the
Alliance of Western Energy Consumers

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 358

In the Matter of)	AFFIDAVIT OF BRADLEY G. MULLINS
)	
PORTLAND GENERAL ELECTRIC)	
COMPANY,)	
)	
Advice No. 19-02, New Load Direct Access)	
Program.	_)	

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/100-102 and AWEC/200-201) on behalf of AWEC 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 25 day of October, 2019.

BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this ½ day of October, 2019.

OFFICIAL STAMP
RAINBOW WAINRIGHT
NOTARY PUBLIC-OREGON
COMMISSION NO. 975018
MY COMMISSION EXPIRES MAY 21, 2022

Notary Public for Oregon My Commission Expires:

Multhoman County