



ALISHA TILL
Direct (503) 290-3628
alisha@mrg-law.com

January 17, 2023

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 2032 – Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities

Attention Filing Center:

Attached for filing in the above-captioned docket is Portland General Electric Company's Motion to Admit Prefiled Testimony and Exhibits.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachment

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2032

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities.

**PORTLAND GENERAL ELECTRIC
COMPANY'S MOTION TO ADMIT
PREFILED TESTIMONY AND
EXHIBITS**

1 In accordance with OAR 860-001-0420, Portland General Electric Company moves for the
2 following to be admitted into the record in this proceeding: 1) the pre-filed testimony and exhibits
3 of Ian Beil (*adopting* Joint Utilities/100, Joint Utilities/400-401, and Joint Utilities/500), Shaun
4 Foster (Joint Utilities/100, Joint Utilities/400-401, and Joint Utilities/500) and Robert Macfarlane
5 (Joint Utilities/200 and Joint Utilities/300-301), and 2) the attached declarations of these same
6 witnesses attesting that their pre-filed testimony and exhibits are true and correct.

Dated: January 17, 2023

MCDOWELL RACKNER GIBSON PC



Lisa Rackner
Jordan Schoonover
419 SW 11th Avenue, Suite 400
Portland, Oregon 97205
Telephone: (503) 595-3922
Facsimile: (503) 595-3928
dockets@mrg-law.com

Donald J. Light
Portland General Electric Company

Attorneys for Portland General Electric Company

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2032

In the Matter of:

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities.

DECLARATION OF IAN BEIL

1 I, Ian Beil, declare under penalty of perjury under the laws of the state of Oregon:

2 1. My name is Ian Beil and I am the Manager of the Transmission Planning
3 Department at Portland General Electric Company.

4 2. I am adopting Sean Larson's and Andrey Olennikov's testimony and exhibits
5 previously filed on behalf of the Joint Utilities in this matter. (See Joint Utilities/100, Joint
6 Utilities/400-401, and Joint Utilities/500).

7 3. My pre-filed testimony and exhibits are true and accurate based on my information
8 and belief.

9 I hereby declare that the above statement is true to the best of my knowledge and belief,
10 and that I understand it is made for use as evidence before the Public Utility Commission of
11 Oregon and is subject to penalty for perjury.

SIGNED this 30th day of June, 2022, at Portland, Oregon.

Signed: 

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2032

In the Matter of:

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities.

DECLARATION OF SHAUN FOSTER

1 I, Shaun Foster, declare under penalty of perjury under the laws of the state of Oregon:

2 1. My name is Shaun Foster and I am the Manger of Interconnection Services at
3 Portland General Electric Company.

4 2. I am the same Shaun Foster that previously filed testimony and exhibits on behalf
5 of the Joint Utilities in this matter. (See Joint Utilities/100, Joint Utilities/400-401, and Joint
6 Utilities/500).

7 3. My pre-filed testimony and exhibits are true and accurate based on my information
8 and belief.

9 I hereby declare that the above statement is true to the best of my knowledge and belief,
10 and that I understand it is made for use as evidence before the Public Utility Commission of
11 Oregon and is subject to penalty for perjury.

SIGNED this 13th day of January, 2023, at Portland, Oregon.

Signed: ___/s/ Shaun Foster _____

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2032

In the Matter of:

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities.

**DECLARATION OF ROBERT
MACFARLANE**

1 I, Robert Macfarlane, declare under penalty of perjury under the laws of the state of
2 Oregon:

3 1. My name is Robert Macfarlane and I am the Manager of Pricing and Tariffs at
4 Portland General Electric Company.

5 2. I am the same Robert Macfarlane that previously filed testimony and exhibits on
6 behalf of the Joint Utilities in this matter. (See Joint Utilities/200 and Joint Utilities/300-301).

7 3. My pre-filed testimony and exhibits are true and accurate based on my information
8 and belief.

9 I hereby declare that the above statement is true to the best of my knowledge and belief,
10 and that I understand it is made for use as evidence before the Public Utility Commission of
11 Oregon and is subject to penalty for perjury.

SIGNED this 12th day of January, 2023, at Portland, Oregon.

Signed: Robert Macfarlane