

**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

NEWSUN ENERGY LLC MOTION
TO ADMIT PRE-FILED TESTIMONY,
EXHIBITS AND CROSS
EXAMINATION EXHIBITS.

NewSun Energy LLC (“NewSun”) respectfully moves for the admission of the following pre-filed testimony and exhibits into the record as evidence in this proceeding: NewSun testimony and exhibits of Brian S. Rahman (NewSun/100-101), Brittany Andrus (NewSun/200-201, 400-406), David Bunge (NewSun/300-301), Mark Boissevian (NewSun/500-501), and NewSun cross-examination exhibits (NewSun/600-605).

The above-referenced testimony and exhibits are supported by the attached declarations of Brian S. Rahman, Brittany Andrus, David Bunge, and Mark Boissevain.

Dated this 24th day of January 2023.

Respectfully submitted,

NewSun Energy LLC

/s/ Marie P. Barlow

Marie P. Barlow, In-House Counsel,
Policy & Regulatory Affairs
NewSun Energy LLC
mbarlow@newsunenergy.net

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DECLARATION OF BRIAN
RAHMAN

I, Brian Rahman, declare the following:

1. My name is Brian S. Rahman, Executive Director of Engineering at ZGlobal Inc. I prepared testimony and exhibits in this proceeding on behalf of NewSun Energy LLC.
2. I sponsored NewSun testimony and exhibits NewSun/100-101.
3. The above referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 18 day of January, 2023.



Brian Rahman

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

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Upgrade Costs for Qualifying Facilities

DECLARATION OF BRITTANY
ANDRUS

I, Brittany Andrus, declare the following:

1. My name is Brittany Andrus, Consultant. I prepared testimony and exhibits in this proceeding on behalf of NewSun Energy LLC.
2. I sponsored NewSun testimony and exhibits NewSun/200-201, NewSun/400-406.
3. The above referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 17th day of January, 2023.


Brittany Andrus

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2032

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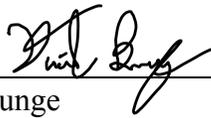
DECLARATION OF DAVID BUNGE

I, David Bunge, declare the following:

1. My name is David Bunge, President of Azimuth Renewables. I prepared testimony and exhibits in this proceeding on behalf of NewSun Energy LLC.
2. I sponsored NewSun testimony and exhibits NewSun/300-301.
3. The above referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 23rd day of January, 2023.



David Bunge

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DECLARATION OF MARK
BOISSEVAIN

I, Mark Boissevain, declare the following:

1. My name is Mark Boissevain, Solutions Director at Energy Automation Solutions Engineering – EASE LLC. I prepared testimony and exhibits in this proceeding on behalf of NewSun Energy LLC.
2. I sponsored NewSun testimony and exhibits NewSun/500-501.
3. The above referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 24th day of January, 2023.



Mark Boissevain