



Portland General Electric Company
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Douglas C. Tingey
Associate General Counsel

June 16, 2020

Via Electronic Filing

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

**Re: UE 370 – PORTLAND GENERAL ELECTRIC COMPANY, Renewable Resource Automatic Adjustment Clause (Schedule 122) (Wheatridge Renewable Energy Farm); and
UE 372 – PORTLAND GENERAL ELECTRIC COMPANY, Renewable Resource Automatic Adjustment Clause (Schedule 122) (BPSC Energy Storage Microgrid and ARC Energy Storage)
Consolidated**

Dear Filing Center:

Enclosed for filing today in the above-captioned consolidated dockets are the following:

- PGE's Motion to Admit Pre-Filed Testimony and Exhibits
- Declaration of Craig Armstrong
- Declaration of Greg Batzler
- Declaration of Andrew Speer
- Declaration of Darren Murtaugh
- Declaration of Stefan Cristea

These documents are being filed by electronic mail with the Filing Center.

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

Sincerely,

/s/ Douglas C. Tingey

Douglas C. Tingey
Associate General Counsel

DT:hp
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 370, UE 372

In the Matters of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Wheatridge
Renewable Energy Farm) (UE 370), and

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (BPSC Energy Storage
Microgrid and ARC Energy Storage)
(UE 372).

**PORTLAND GENERAL ELECTRIC
COMPANY’S MOTION TO ADMIT
PRE-FILED TESTIMONY AND
EXHIBITS**

Pursuant to OAR 860-001-0350, Portland General Electric Company (“PGE”) respectfully moves to the Public Utility Commission of Oregon to admit the following pre-filed direct testimony, reply testimony, and surrebuttal testimony and exhibits into the record as evidence in this proceeding:

| Testimony and Exhibits | Witnesses |
|--|------------------------------------|
| PGE/100-101 | Craig Armstrong and Greg Batzler |
| PGE/200-201 | Andrew Speer |
| PGE/300 PGE/301 (Confidential) PGE/302 PGE/303-307 (Confidential) | Craig Armstrong and Greg Batzler |
| PGE/400-402 PGE/403-406 (Confidential) | Darren Murtaugh and Stefan Cristea |
| PGE/500 | Andrew Speer |
| PGE/600 | Craig Armstrong and Greg Batzler |

In support of this motion, PGE has attached the declarations of the above persons, attesting to the truth and accuracy of their testimony and exhibits.

DATED this 16th day of June, 2020.

Respectfully submitted,

/s/ Douglas C. Tingey

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UE 370, UE 372

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COMPANY,

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Clause (Schedule 122) (Wheatridge Renewable
Energy Farm) (UE 370), and

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Clause (Schedule 122) (BPSC Energy Storage
Microgrid and ARC Energy Storage) (UE 372).

**DECLARATION OF CRAIG
ARMSTRONG**

I, CRAIG ARMSTRONG, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Craig Armstrong. I am a Project Manager at Portland General Electric Company (“PGE”).
2. On December 3, 2019, I filed testimony and associated exhibits (DIRECT TESTIMONY PGE/100-101, Armstrong–Batzler) on behalf of PGE in this matter.
3. On April 24, 2020, I filed testimony and associated exhibits (REPLY TESTIMONY PGE/300-307, Armstrong–Batzler) on behalf of PGE in this matter.
4. On June 3, 2020, I filed testimony (SURREBUTTAL TESTIMONY PGE/600, Armstrong–Batzler).

5. 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 16th day of June, 2020.

/s/ Craig Armstrong

Craig Armstrong

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Clause (Schedule 122) (BPSC Energy Storage
Microgrid and ARC Energy Storage) (UE 372).

DECLARATION OF GREG BATZLER

I, GREG BATZLER, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Greg Batzler. I am a Regulatory Consultant in the Rates and Regulatory Affairs Department at Portland General Electric Company (“PGE”).
2. On December 3, 2019, I filed testimony and associated exhibits (DIRECT TESTIMONY PGE/100-101, Armstrong–Batzler) on behalf of PGE in this matter.
3. On April 24, 2020, I filed testimony and associated exhibits (REPLY TESTIMONY PGE/300-307, Armstrong–Batzler) on behalf of PGE in this matter.
4. On June 3, 2020, I filed testimony (SURREBUTTAL TESTIMONY PGE/600, Armstrong–Batzler).

5. 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 16th day of June, 2020.

/s/ Greg Batzler

Greg Batzler

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Clause (Schedule 122) (BPSC Energy Storage
Microgrid and ARC Energy Storage) (UE 372).

DECLARATION OF ANDREW SPEER

I, ANDREW SPEER, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Andrew Speer. I am currently a Manager in the Local Government Affairs department at Portland General Electric Company (“PGE”). Previously, I was a Regulatory Consultant in the Rates and Regulatory Affairs department at PGE.

2. On December 3, 2019, I filed testimony and associated exhibits (DIRECT TESTIMONY PGE/200-201, Speer) on behalf of PGE in this matter.

3. On April 24, 2020, I filed testimony and associated exhibits (REPLY TESTIMONY PGE/500, Speer) on behalf of PGE in this matter.

4. 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 16th day of June, 2020.

/s/ Andrew Speer

Andrew Speer

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Clause (Schedule 122) (BPSC Energy Storage
Microgrid and ARC Energy Storage) (UE 372).

**DECLARATION OF DARREN
MURTAUGH**

I, DARREN MURTAUGH, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Darren Murtaugh. I am the Manager of Grid Edge Solutions at Portland General Electric Company (“PGE”).
2. On April 24, 2020, I filed testimony and associated exhibits (REPLY TESTIMONY PGE/400-406, Murtaugh–Cristea) on behalf of PGE 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 16th day of June, 2020.

/s/ Darren Murtaugh

Darren Murtaugh

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Clause (Schedule 122) (BPSC Energy Storage
Microgrid and ARC Energy Storage) (UE 372).

**DECLARATION OF STEFAN
CRISTEA**

I, STEFAN CRISTEA, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Stefan Cristea. I am a Senior Regulatory Analyst in the Rates and Regulatory Affairs department at Portland General Electric Company (“PGE”).

2. On April 24, 2020, I filed testimony and associated exhibits (REPLY TESTIMONY PGE/400-406, Murtaugh–Cristea) on behalf of PGE 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 16th day of June, 2020.

/s/ Stefan Cristea

Stefan Cristea