

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2051**

FOSSIL LAKE SOLAR, LLC,  
COMPLAINANT,

v.

PORTLAND GENERAL ELECTRIC  
COMPANY,  
DEFENDANT.

FOSSIL LAKE SOLAR, LLC’S  
MOTION TO ADMIT PRE-FILED  
TESTIMONY

Fossil Lake Solar, LLC (“Fossil Lake”) respectfully moves for the following pre-filed testimony and exhibits to be admitted into the record in this proceeding:

- Declaration of David W. Brown in Support of Fossil Lake Solar, LLC’s Motion for Summary Judgment dated May 19, 2020.
- Supplemental Declaration of David W. Brown in Support of Fossil Lake Solar, LLC’s Cross Motion for Summary Judgment dated June 23, 2020.
- Complaint/Exhibit A - Standard Renewable Off-System Variable Power Purchase Agreement, dated April 1, 2015.
- Complaint/Exhibit B - PGE Termination Notice.
- Complaint/Exhibit C – PGE Rejection Letter.

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This Motion is supported by the Affidavit of David W. Brown attesting that his pre-filed testimony and exhibits are true and correct.

DATED this 7<sup>th</sup> day of July, 2020.

**CABLE HUSTON LLP**

/s/ Richard G. Lorenz

Richard G. Lorenz, OSB No. 003086

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*Attorney for Fossil Lake Solar, LLC*



- Complaint/Exhibit A - Standard Renewable Off-System Variable Power Purchase Agreement, dated April 1, 2015;
- Complaint/Exhibit B - PGE Termination Notice; and
- Complaint/Exhibit C – PGE Rejection Letter

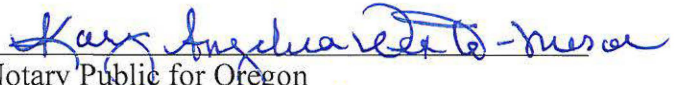
5. I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct.

SIGNED this 7<sup>th</sup> day of July, 2020 at Portland, Oregon.



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DAVID W. BROWN

SUBSCRIBED AND SWORN to before me this 7<sup>th</sup> day of July, 2020.



Notary Public for Oregon

My Commission Expires: January 15, 2022

