

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 UM 2152

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY,

7 Detailed Depreciation Study of Electric Utility
8 Properties.

STAFF RESPONSE TO MOTION TO COMPEL
DISCOVERY OF THE ALLIANCE OF
WESTERN ENERGY CONSUMERS

9 Staff of the Public Utility Commission of Oregon (Staff) files this response in support of
10 the recommendation to open an investigation to establish minimum filing requirements for
11 utilities in depreciation cases in the above-captioned proceeding filed by the Alliance of Western
12 Energy Consumers (AWEC).

13 Staff supports AWEC's request in this proceeding to open an investigation to establish
14 minimum filing requirements for utilities in depreciation cases. As to AWEC's first request to
15 compel the data in this proceeding, Staff notes that the Staff Settlement Proposal is due to parties
16 by June 18, 2021.¹ Accordingly, Staff has received the data that it needs from PGE for its
17 analysis. Staff notes that it prefers to stay on target with the procedural schedule as adopted if
18 the ALJ were to grant AWEC's motion to compel.

19 DATED this 18th day of May 2021.

20 Respectfully submitted,

21 ELLEN ROSENBLUM
22 Attorney General

23 */s/ Jill Goatcher*

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Jill Goatcher, OSB #202294
25 Assistant Attorney General
26 Of Attorneys for Staff of the Public Utility
Commission of Oregon

¹ Reference procedural schedule