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October 15, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
Detailed Depreciation Study of Electric Utility Properties.
Docket No. UM 2152

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Motion to Admit Pre-filed Testimony and Exhibits in the above-referenced docket.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2152

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	MOTION TO ADMIT OF THE
COMPANY,)	ALLIANCE OF WESTERN ENERGY
)	CONSUMERS
Detailed Depreciation Study of Electric Utility)	
Properties.)	
_____)	

The Alliance of Western Energy Consumers (“AWEC”) moves for admission into the record of this proceeding the following pre-filed testimony and exhibits submitted on behalf of AWEC.

<u>Exhibit</u>	<u>Description</u>
AWEC/100	Opening Testimony of Lance D. Kaufman
AWEC/101	Curriculum Vitae of Lance D. Kaufman
AWEC/102	Responses to Data Requests
AWEC/103	Depreciation Background
AWEC/104	PGE 2012 to 2019 Reserve Imbalance Summary (Revised Version filed Oct. 1, 2021)
AWEC/105	PGE 2012 and 2019 Depreciation Study Comparison

<u>Exhibit</u>	<u>Description</u>
Confidential AWEC/106	PGE Electric Industry Statistics
Confidential AWEC/107	OPUC Staff Residual Sum of Squares Calculations
AWEC/108	Helicopter Depreciation Article
AWEC/109	Helicopter Valuation Article
AWEC/110	Retirement Curve Analysis
AWEC/200	FERC Order Accepting Depreciation Rates, Docket Nos. ER11-2584-000 and ER11-2579-000 (Feb. 28, 2011)
AWEC/201	FERC Order on Retail Adjustments to Depreciation Reserves, Docket No. ER11-3584-000 (July 15, 2011)
AWEC/202	Excerpt of Florida Public Service Commission Order No. PSC-10-0153-FOF-EI, Docket Nos. 080677-EI and 090130-EI (Mar. 17, 2010)
AWEC/203	Excerpt of <u>Depreciation Systems</u> , Frank K. Wolf and W. Chester Fitch (1994)
AWEC/204	Excerpt of <u>Public Utility Depreciation Practices</u> , NARUC (Aug.1996)
AWEC/205	Excerpt of PacifiCorp's 2017 Depreciation Study, Calculated Annual Depreciation Accruals Related to Electric Plant as of December 31, 2017

<u>Exhibit</u>	<u>Description</u>
AWEC/206	Excerpt of Puget Sound Energy's 2016 Depreciation Study, Calculated Annual Depreciation Accruals Related to Electric, Gas, and Common Plant as of September 30, 2016
AWEC/207	Direct Testimony of PacifiCorp Witness John J. Spanos in Docket No. UM 1968 (Sept. 2018)
AWEC/208	Excerpt of Arizona Corporation Commission Decision No. 75975, Docket Nos. E-01933A-15-0239 and E-01933A-15-0322
Confidential AWEC/209	Confidential PGE Response to AWEC Data Request 024 and Confidential Attachment "PGE data questions.pdf" to PGE Response to AWEC DR 005
AWEC/210	PGE Response to AWEC Data Request 023
AWEC/211	PGE Response to AWEC Data Request 046 and Attachment A thereto
AWEC/212	PGE Response to AWEC Data Request 064
AWEC/213	Idaho Public Utilities Commission Order No. 3296, Case No. PAC-E-13-02
AWEC/214	PGE Response to AWEC Data Request 065
AWEC/215	PGE Response to AWEC Data Request 066
AWEC/216	PGE Response to AWEC Data Request 067

<u>Exhibit</u>	<u>Description</u>
AWEC/217	PGE Response to AWEC Data Request 070
AWEC/218	PGE Response to AWEC Data Request 071
AWEC/219	PGE Response to AWEC Data Request 072
AWEC/220	PGE Response to AWEC Data Request 073
AWEC/221	PGE Response to AWEC Data Request 074
AWEC/222	PGE Response to AWEC Data Request 075
AWEC/223	PGE Response to AWEC Data Request 076
AWEC/224	OPUC Response to AWEC Data Request 005
AWEC/225	OPUC Response to AWEC Data Request 007

The Declaration of Lance D. Kaufman attesting to the truth and accuracy of his testimony and exhibit filings is attached.

Dated this 15th day of October, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2152

In the Matter of)	
)	DECLARATION OF
PORTLAND GENERAL ELECTRIC)	LANCE D. KAUFMAN
COMPANY,)	
)	
Detailed Depreciation Study of Electric Utility)	
Properties.)	
_____)	

I, LANCE D. KAUFMAN, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Lance D. Kaufman. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers (“AWEC”) in this matter.
2. On behalf of AWEC, I sponsored pre-filed testimony and exhibits in this proceeding (AWEC/100-110).
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 13 day of October, 2021.



LANCE D. KAUFMAN