

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

3 UE 394

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

STAFF MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS

8 Staff of the Public Utility Commission of Oregon (Staff) moves for admission of the
9 following pre-filed testimony and exhibits into the record of the above-captioned docket:

10 Staff	
11 Exhibit No.	Description
12 100	Opening Testimony of Matt Muldoon
13 200	Opening Testimony of John Fox
14 201	Witness Qualifications Statement of John Fox
15 202	PGE Responses to Standard DR No. 080, PGE 2020 Cost Allocation Manual, 16 PGE Response to Staff DR Nos. 204, 205, 269, 276, 288, 559, 563, 570, 766, 17 767, 028
18 300	Opening Testimony of Heather Cohen
19 301	Witness Qualifications Statement
20 302	PGE Response to Staff DR Nos. 58 (EF), ¹ 92A (EF), 93, 101 (UE 335), 101, 161 21 (EF), 162 (EF), 234, 236, 253, 391, 491, 583, 797, 104
22 303	Oregon Economic Revenue Forecast – September 2021
23 304	Staff and Wage Salary Model (EF)
24 400	Opening Testimony of Michelle Scala
25 401	Witness Qualifications Statement of Michelle Scala

26 _____
¹ Electronic Format.

1	402	PGE Workpapers (EF), PGE Responses to Staff DR Nos. 861, 855 revised and
2		original (EF), 356, 363, 364, 638, 441, 446, PGE 2022 GRC Street Area Light
3		Model (EF), 653 (EF), 442, 382, 381, 380, 376, 378, 373 (EF)
4	403	Confidential PGE Response to Staff Dr No. 414
5	404	Highly Confidential PGE Response to DR 849, 852
6	500	Opening Testimony of Brian Fjeldheim
7	501	Witness Qualifications Statement of Brian Fjeldheim
8	502	PGE Third Revised Response to SDR No. 058 (EF), 063 (EF), 78 (EF), <i>How</i>
9		<i>Much Does Access Control Cost Per Door</i> (ACME Locksmith.com)
10	503	Confidential PGE Responses to Staff DRs.
11	600	Opening Testimony of Curtis Dlouhy
12	601	Witness Qualifications Statement of Curtis Dlouhy
13	602	PGE Non-confidential responses to Staff and Parties Data Requests
14	603	Testimony excerpt, UE 335 Staff/500, Fox/26-30
15	604	Financial News
16	605	Confidential Attachments to Responses to Data Requests
17	606	Highly Confidential Responses and Attachments to Data Requests
18	700	Opening Testimony of Nadine Hanhan
19	701	Witness Qualifications Statement
20	702	PGE Responses to Staff DR Nos. 508, 509, 527, 532, 046, UM 2031 PGE
21		Response to Staff DR No. 46
22	703	Confidential PGE Responses to Staff DR Nos. 615, 627, 682, 718
23	704	Confidential Project Justification Forms
24	705	Confidential White Paper regarding St. Mary's Battery Addition
25	706	Confidential White Paper regarding Butler Substation
26	800	Opening Testimony of Nicholas (Nick) Sayen

1	801	Witness Qualifications Statement
2	802	PGE Responses to Staff DR Nos. 006, 468, 470, 471, 842, 311, 326, 758, 759
3	803	Confidential PGE Responses to Staff DR Nos. 006, 198, 334, 470, 832, 833, 842
4	900	Opening Testimony of Scott Gibbens
5	901	Witness Qualifications Statement of Scott Gibbens
6	1000	Opening Testimony of Moya Enright
7	1001	Witness Qualifications Statement
8	1002	PGE Responses to Staff DR Nos. 584, 587, 588, 591, 592, 778, 780, 812, 814,
9		815, 817, 818, 820, 821, 822, 825, 827, 828, 908, 910, 911, 912, 914, 921, 925,
10		926, 808, 809, 006, 022, PGE Response to Staff DR No. 22 (UE 356).
11	1100	Opening Testimony of Mitchell Moore
12	1101	Witness Qualifications Statement of Mitchell Moore
13	1102	PGE Response to Staff DR Nos. 062, 756, 801
14	1103	PGE Response to Staff DR No. 756 (EF)
15	1200	Opening Testimony of Paul Rossow
16	1201	Witness Qualifications Statement
17	1202	List of FERC Accounts/Staff Disallowances
18	1203	PGE Response to Staff DR No. 437
19	1204	PGE Response to Staff DR No. 341
20	1205	PGE Response to Staff DR No. 438
21	1206	PGE Response to Staff DR No. 354
22	1207	Sum of Escalated Disallowed Costs
23	1300	Opening Testimony of Kathy Zarate
24	1301	Witness Qualifications Statement of Kathy Zarate
25	1302	PGE Response to Staff DR No. 557
26	1303	PGE Response to Staff DR 654

1	1400	Opening Testimony of Max St. Brown
2	1401	Witness Qualifications Statement of Max St. Brown
3	1402	Staff Workpaper
4	1403	Staff Workpaper
5	1404	Excel Spreadsheet
6	1405	PGE Responses to Staff DR Nos. 400, 401, 646, 644, 845, 183 (EF), 516 (EF)
7	1500	Opening Testimony of
8	1501	Witness Qualifications Statement
9	1502	PGE Responses to Staff DR Nos. 186, 187, 188, 189, 190, 191, 192, 193, 194,
10		195, 196, 512, 513, 514, 555
11	1600	Opening Testimony of Anna Kim
12	1601	Witness Qualifications Statement of Anna Kim
13	1602	PGE Responses to Staff DR Nos. 605, 606, 607, 608
14	1700	Opening Testimony of Eric Shierman
15	1701	Witness Qualifications Statement Eric Shierman
16	1702	Staff Workpaper
17	1703	Staff Workpaper
18	1704	Staff Workpaper
19	1705	Staff Workpaper
20	1706	PGE Responses to Staff DR 738, 425, 419, 746, 150
21	1707	Staff Workpaper
22	1800	Opening Testimony of Steve Storm
23	1801	Witness Qualifications Statement of Steve Storm
24	1900	Opening Testimony of Rose Anderson
25	1901	Witness Qualifications Statement of Rose Anderson
26	1902	PGE Response to Staff DR No. 603

1	2000	Opening Testimony of Jean-Pierre (JP) Batmale
2	2001	Witness Qualifications Statement of JP Batmale
3	2002	PGE Response to Staff DR No. 487
4	2003	PGE Response to Staff DR No. 483
5	2100	Opening Testimony of Nicholas (Nick) Sayen
6	2101	N/A
7	2102	PGE Responses to Staff DR No. 481, 482 (EF), 610, 480, 648, 2103
8		(Confidential), 775, Order No. 21-191 (UM 1708(6))
9	2200	Response Testimony of Matt Muldoon
10	2300	Response Testimony of Michelle Scala
11	2301	PGE Response to Staff DR Nos. 937, 855
12	2302	PGE Response to Staff DR Nos. 941, 949, 942
13	2303	Highly Confidential PGE Response to Staff DR No. 852.
14	2400	Response Testimony of Curtis Dlouhy
15	2500	Response Testimony of Moya Enright
16	2501	Confidential Response to Staff DR No. 817
17	2600	Response Testimony of Moore-Dlouhy-Storm
18	2601	PGE Response to Staff DR No. 126
19	2700	Response Testimony of Max St. Brown

20
21 This motion is supported by the declarations of Staff witnesses Matt Muldoon, John Fox,
22 Heather Cohen, Michelle Scala, Brian Fjeldheim, Dr. Curtis Dlouhy, Nadine Hanhan, Nick
23 Sayen, Scott Gibbens, Moya Enright, Mitch Moore, Paul Rossow, Kathy Zarate, Dr. Max St.
24 Brown, Ming Peng, Anna Kim, Eric Shierman, Steve Storm, Rose Anderson, and J.P. Batmale.
25 These witnesses attest to the truthfulness of their testimony. The declarations are attached to this
26 motion.

1 DATED this 15th day of February, 2022.

2
3 Respectfully submitted,

4 ELLEN F. ROSENBLUM
5 Attorney General

6 */s/ Stephanie Andrus*

7 _____
8 Stephanie Andrus, OSB No. 925123
9 Sr. Assistant Attorney General
10 Of Attorneys for Staff of the Public Utility
11 Commission of Oregon
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1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF MATT MULDOON

8 I, Matt Muldoon, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Matt Muldoon. I am a Manager employed in the Rates, Finance and Audit
10 Division of the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/100 (Opening Testimony), Staff/2200 (Rebuttal Testimony), Stipulating Parties/102
13 (Witness Qualification Statement), Stipulating Parties/100 (Joint Testimony in Support of
14 a Stipulation), Stipulating Parties/200 (Joint Testimony in Support of a Stipulation), and
15 Stipulating Parties 300 (Joint Testimony in Support of a Stipulation).
- 16 3. To the best of my knowledge, my testimony and my witness qualification statement are
17 true and accurate.

18 I hereby declare that the above statements are true to the best of my knowledge and belief,
19 and I understand it is made for use as evidence before the Public Utility Commission of
20 Oregon and is subject to penalty for perjury.

21
22 SIGNED this 9th day of February, 2022 at Salem, Oregon.

23
24
25 Signed: /s/ Matthew J. Muldoon
26 Matt Muldoon

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
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4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY,

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DECLARATION OF JOHN FOX

8 I, John Fox, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is John Fox. I am a Senior Financial Analyst employed in the Rates, Finance
10 and Audit Division of the Public Utility Commission of Oregon.

11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/200 (Opening Testimony) and Staff 201 (Witness Qualification Statement).

13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this ___ day of February, 2022 at Salem, Oregon.
20

21
22 Signed: John L Fox
23 John Fox
24
25
26

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4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
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DECLARATION OF HEATHER COHEN

8 I, Heather Cohen, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Heather Cohen. I am a Senior Utility Analyst employed in the Rates, Finance
10 and Audit Division of the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/300 (Opening Testimony) and Staff 301 (Witness Qualification Statement).
- 13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: Heather Cohen
23 Heather Cohen
24
25
26

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3 **UE 394**

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY,

7 Request for a General Rate Revision.

DECLARATION OF MICHELLE SCALA

8 I, Michelle Scala, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Michelle Scala. I am a Senior Utility Analyst employed in the Utility
10 Strategy and Integration Division of the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/400 (Opening Testimony), Staff/401 (Witness Qualification Statement), and
13 Staff/2300 (Rebuttal Testimony).
- 14 3. To the best of my knowledge, my testimony and my witness qualification statement are
15 true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,
17 and I understand it is made for use as evidence before the Public Utility Commission of
18 Oregon and is subject to penalty for perjury.

19
20 SIGNED this 9th day of February, 2022 at Salem, Oregon.

21
22
23 Signed: /s/ Michelle Scala.
24 Michelle Scala

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6 COMPANY,
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DECLARATION OF BRIAN FJELDHEIM

8 I, Brian Fjeldheim, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Brian Fjeldheim. I am a Senior Financial Analyst employed in the Rates,
10 Finance and Audit Division of the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/500 (Opening Testimony) and Staff 501 (Witness Qualification Statement).
- 13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: /s/Brian Fjeldheim
23 Brian Fjeldheim
24
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26

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4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY,

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DECLARATION OF DR. CURTIS DLOUHY

8 I, Dr. Curtis Dlouhy, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Curtis Dlouhy. I am a Senior Economist employed in the Rates, Finance and
10 Audit Division of the Public Utility Commission of Oregon.

11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:

12 Staff/600 (Opening Testimony), Staff/601 (Witness Qualification Statement), Staff/2400
13 (Rebuttal Testimony) and Staff/2600 (Co-Sponsored Rebuttal Testimony).

14 3. To the best of my knowledge, my testimony and my witness qualification statement are
15 true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,
17 and I understand it is made for use as evidence before the Public Utility Commission of
18 Oregon and is subject to penalty for perjury.

19
20 SIGNED this _9th_ day of February, 2022 at Salem, Oregon.

21
22
23 Signed: /s/Curtis Dlouhy
24 Dr. Curtis Dlouhy

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5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
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DECLARATION OF NADINE HANHAN

8 I, Nadine Hanhan, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Nadine Hanhan. I am a Senior Analyst employed in the Energy Resources
10 and Planning Division of the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/700 (Opening Testimony) and Staff 701 (Witness Qualification Statement).
- 13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.

20
21
22 Signed: _____

23 Nadine Hanhan
24
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26

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4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF SCOTT GIBBENS

8 I, Scott Gibbens, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Scott Gibbens. I am a Policy and Economic Analysis Manager employed in
10 the Utility Strategy and Integration Division of the Public Utility Commission of Oregon.
11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/900 (Opening Testimony) and Staff 901 (Witness Qualification Statement).
13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: /s/ Scott Gibbens
23 Scott Gibbens
24
25
26

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2 **OF OREGON**

3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF MOYA ENRIGHT

8 I, Moya Enright, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Moya Enright. I am a Senior Economist employed in the Rates, Finance and
10 Audit division at the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1000 (Opening Testimony), Staff/1001 (Witness Qualification Statement), and
13 Staff/2500 (Rebuttal Testimony).
- 14 3. To the best of my knowledge, my testimony and my witness qualification statement are
15 true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,
17 and I understand it is made for use as evidence before the Public Utility Commission of
18 Oregon and is subject to penalty for perjury.

19
20 SIGNED this 9th day of February, 2022 at Salem, Oregon.

21
22
23 Signed: /s/ Moya Enright
24 Moya Enright

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

3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF MITCHELL MOORE

8 I, Mitchell Moore, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Mitchell Moore. I am a Senior Utility Analyst employed in the Rates,
10 Finance and Audit division at the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1100 (Opening Testimony), Staff/1101 (Witness Qualification Statement), and
13 Staff/2600 (Co-Sponsored Rebuttal Testimony).
- 14 3. To the best of my knowledge, my testimony and my witness qualification statement are
15 true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,
17 and I understand it is made for use as evidence before the Public Utility Commission of
18 Oregon and is subject to penalty for perjury.

19
20 SIGNED this 9th day of February, 2022 at Salem, Oregon.

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22
23 Signed: /s/Mitchell Moore
24 Mitchell Moore

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2 **OF OREGON**

3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF PAUL ROSSOW

8 I, Paul Rossow, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Paul Rossow. I am a Utility Analyst employed in the Energy Resources and
10 Planning division at the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1200 (Opening Testimony) and Staff/1201 (Witness Qualification Statement).
- 13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: /s/Paul Rossow
23 Paul Rossow

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

3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF KATHY ZARATE

8 I, Kathy Zarate, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Kathy Zarate. I am a Utility Economist employed in the Rates, Finance and
10 Audit division at the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1300 (Opening Testimony) and Staff/1301 (Witness Qualification Statement).
- 13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: /s/Kathy Zarate
23 Kathy Zarate
24
25
26

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3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF DR. MAX ST. BROWN

8 I, Dr. Max St. Brown, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Max St. Brown. I am a Senior Utility Analyst employed in the Utility
10 Strategy and Integration division at the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1400 (Opening Testimony), Staff/1401 (Witness Qualification Statement) and
13 Staff/2700 (Rebuttal Testimony).
- 14 3. To the best of my knowledge, my testimony and my witness qualification statement are
15 true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,
17 and I understand it is made for use as evidence before the Public Utility Commission of
18 Oregon and is subject to penalty for perjury.

19
20 SIGNED this 9th day of February, 2022 at Salem, Oregon.

21
22
23 Signed: /s/ Max St. Brown
24 Dr. Max St. Brown

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2 **OF OREGON**
3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.


DECLARATION OF MING PENG

8 I, Ming Peng, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Ming Peng. I am a Senior Econometrician employed in the Rates, Finance
10 and Audit division at the Public Utility Commission of Oregon.
11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1500 (Opening Testimony) and Staff/1501 (Witness Qualification Statement).
13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: 
23 Ming Peng

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3 **UE 394**

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY,

7 Request for a General Rate Revision.

DECLARATION OF ANNA KIM

8 I, Anna Kim, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Anna Kim. I am a Senior Utility Analyst employed in the Energy Resources
10 and Planning division at the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1600 (Opening Testimony) and Staff/1601 (Witness Qualification Statement).
- 13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: /S/Anna Kim
23 Anna Kim

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
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3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF ERIC SHIERMAN

8 I, Eric Shierman, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Eric Shierman. I am a Senior Utility Analyst employed in the Energy
10 Resources and Planning division at the Public Utility Commission of Oregon.
11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1700 (Opening Testimony) and Staff/1701 (Witness Qualification Statement).
13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.
18

19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: _____ /s/Eric Shierman
23 Eric Shierman
24
25
26

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3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF STEVEN T. STORM

8 I, Steven T. Storm, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Steven T. Storm. I am a Senior Economist employed in the Rates, Finance
10 and Audit division at the Public Utility Commission of Oregon.

11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1800 (Opening Testimony), Staff/1801 (Witness Qualification Statement) and
13 Staff/2600 (Co-Sponsored Rebuttal Testimony)

14 3. To the best of my knowledge, my testimony and my witness qualification statement are
15 true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,
17 and I understand it is made for use as evidence before the Public Utility Commission of
18 Oregon and is subject to penalty for perjury.

19
20 SIGNED this 9th day of February, 2022 at Salem, Oregon.

21
22
23 Signed: Steven T. Storm
24 Steven T. Storm
25
26

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4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

DECLARATION OF ROSE ANDERSON

8 I, Rose Anderson, declare under penalty of perjury under the laws of the State of Oregon:

- 9 1. My name is Rose Anderson. I am a Senior Economist employed in the Energy Resources
10 and Planning division at the Public Utility Commission of Oregon.
- 11 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
12 Staff/1900 (Opening Testimony), Staff/1901, and Staff/1902.
- 13 3. To the best of my knowledge, my testimony and my witness qualification statement are
14 true and accurate.

15 I hereby declare that the above statements are true to the best of my knowledge and belief,
16 and I understand it is made for use as evidence before the Public Utility Commission of
17 Oregon and is subject to penalty for perjury.

18
19 SIGNED this 9th day of February, 2022 at Salem, Oregon.
20

21
22 Signed: /s/ Rose Anderson
23 Rose Anderson

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

3 **UE 394**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

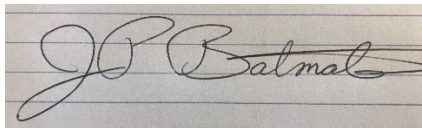
DECLARATION OF JEAN-PIERRE BATMALE

8 I, Jean-Pierre Batmale, declare under penalty of perjury under the laws of the State of
9 Oregon:

- 10 1. My name is Jean-Pierre Batmale. I am the Division Administrator of the Energy
11 Resources and Planning division at the Public Utility Commission of Oregon.
12 2. On behalf of Staff, I drafted testimony and exhibits for use in this docket, as follows:
13 Staff/2000 (Opening Testimony) and Staff/2001.
14 3. To the best of my knowledge, my testimony and my witness qualification statement are
15 true and accurate.

16 I hereby declare that the above statements are true to the best of my knowledge and belief,
17 and I understand it is made for use as evidence before the Public Utility Commission of
18 Oregon and is subject to penalty for perjury.
19

20 SIGNED this 10th day of February, 2022 at Salem, Oregon.
21

22 
23

24 Signed: _____
25 Jean-Pierre Batmale
26