

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 400**

4 In the Matter of
5 PACIFICORP, dba PACIFIC POWER,
6 2023 Transition Adjustment Mechanism.

**STAFF MOTION TO ADMIT PRE-FILED
EXHIBITS**

8 Staff of the Oregon Public Utility Commission moves the Administrative Law Judge to
9 admit the following pre-filed exhibits into the record in the above-captioned docket.

10 Staff 100	Opening Testimony of Moya Enright (adopted by Brian Fjeldheim)
11 Staff 101	Enright Witness Qualifications Statement
12 Staff 102	PGE Responses to Staff Data Requests
13 Staff 200	Opening Testimony of Heather Cohen
14 Staff 201	Cohen Witness Qualifications Statement
15 Staff 202	PacifiCorp Responses to Staff Data Requests
16 Staff 203	PacifiCorp Confidential Responses to Staff Data Requests
17 Staff 204	Confidential DA-RT Adder Workbook (PacifiCorp work paper)
18 Staff 300	Opening Testimony of Curtis Dlouhy
19 Staff 301	Dlouhy Witness Qualifications Statement
20 Staff 302	PacifiCorp Non-Confidential Responses to Staff Data Requests
21 Staff 400	Opening Testimony of Madison Bolton
22 Staff 401	Bolton Witness Qualifications Statement
23 Staff 402	Staff workpaper – PTC Rate Adjustment and QF Forecast Adjustment
24 Staff 500	Opening Testimony of Brian Fjeldheim
25	

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**DECLARATION OF
HEATHER COHEN**

8 I, HEATHER COHEN, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Utility Analyst in the Rates, Finance and Audit Division of the
10 Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit 200 and drafted a witness qualifications
13 statement, pre-filed as Staff Exhibit 201.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and
17 belief, and that I understand it is made for use as evidence in court and is subject to
18 penalty for perjury.

19
20 SIGNED this 30th day of August, 2022.

21
22 */s/ Heather Cohen*

23 _____
24 HEATHER COHEN

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**DECLARATION OF
CURTIS DLOUHY**

8 I, CURTIS DLOUHY, state the following, under penalty of perjury in the State of Oregon:

9 1. I am an Economist in the Strategy and Integration Division of the Public Utility
10 Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit 300 and drafted a witness qualifications
13 statement, pre-filed as Staff Exhibit 301.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and
17 belief, and that I understand it is made for use as evidence in court and is subject to
18 penalty for perjury.

19
20 SIGNED this 30th day of August, 2022.

21
22 */s/ Curtis Dlouhy, Ph.D.*

23 _____
24 CURTIS DLOUHY, Ph.D.

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**DECLARATION OF
MADISON BOLTON**

8 I, MADISON BOLTON, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Utility Analyst in the Strategy and Integration Division of the Public
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit 400 and drafted a witness qualifications
13 statement, pre-filed as Staff Exhibit 401.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications
15 statement are true and accurate.

16
17 I hereby declare that the above statement is true to the best of my knowledge and
18 belief, and that I understand it is made for use as evidence in court and is subject to
19 penalty for perjury.

20 SIGNED this 30th day of August, 2022.

21 */s/ Madison Bolton*

22 _____
23 MADISON BOLTON

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**DECLARATION OF
BRIAN FJELDHEIM**

8 I, BRIAN FJELDHEIM, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Financial Analyst in the Rates, Finance and Audit Division of the
10 Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit 500 and drafted a witness qualifications
13 statement pre-filed as Staff Exhibit 501, and co-sponsored Joint testimony in Support of
14 Stipulation pre-filed as Stipulating Parties/100.

15 3. I have reviewed the testimony of Staff witness Moya Enright, pre-filed as Staff
16 Exhibit 100, and adopt her testimony as my own.

17 To the best of my knowledge, my pre-filed testimony, the pre-filed testimony of Moya
18 Enright, and my witness qualifications statement are true and accurate.

19 I hereby declare that the above statement is true to the best of my knowledge and
20 belief, and that I understand it is made for use as evidence in court and is subject to
21 penalty for perjury.

22 SIGNED this 30th day of August, 2022.

23
24 */s/ Brian Fjeldheim*

25 _____
26 BRIAN FJELDHEIM

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**DECLARATION OF
STEVE STORM**

8 I, STEVE STORM, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Economist in the Rates, Finance and Audit Division of the Public
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit 600 and drafted a witness qualifications
13 statement, pre-filed as Staff Exhibit 601.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and
17 belief, and that I understand it is made for use as evidence in court and is subject to
18 penalty for perjury.

19
20 SIGNED this 30th day of August, 2022.

21
22 */s/ Steve Storm*

23 _____
24 STEVE STORM

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**DECLARATION OF
RYAN BAIN**

8 I, RYAN BAIN, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Economist in the Strategy and Integration Division of the Public
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit 700 and drafted a witness qualifications
13 statement, pre-filed as Staff Exhibit 701.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and
17 belief, and that I understand it is made for use as evidence in court and is subject to
18 penalty for perjury.

19
20 SIGNED this 30th day of August, 2022.

21
22 */s/ Ryan Bain, Ph.D.*

23 _____
24 RYAN BAIN, Ph.D.

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**DECLARATION OF
ROSE ANDERSON**

8 I, ROSE ANDERSON, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Economist in the Energy Resources and Planning Division of the
10 Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit 800 and drafted a witness qualifications
13 statement, pre-filed as Staff Exhibit 801.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and
17 belief, and that I understand it is made for use as evidence in court and is subject to
18 penalty for perjury.

19
20 SIGNED this 30th day of August, 2022.

21
22 */s/ Rose Anderson*

23 _____
24 ROSE ANDERSON