# Davison Van Cleve PC

## Attorneys at Law

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August 23, 2023

## 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 COMPANY,

Request for a General Rate Revision.

Docket No. UE 416

Dear Filing Center:

Please find enclosed the Motion to Admit NVPC Testimony and Exhibits on behalf of the Alliance of Western Energy Consumers 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**

### **UE 416**

| In the Matter of                     | )                               |
|--------------------------------------|---------------------------------|
|                                      | ) MOTION TO ADMIT PRE-FILED     |
| Portland General Electric Company,   | ) TESTIMONY AND EXHIBITS OF THE |
|                                      | ) ALLIANCE OF WESTERN ENERGY    |
| Request for a General Rate Revision. | ) CONSUMERS                     |
|                                      |                                 |

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 NVPC Testimony of Bradley G. Mullins  |  |
| AWEC/101              | Qualification Statement of Bradley G. Mullins |  |
| AWEC/102              | PGE Responses to Data Requests                |  |
| AWEC/103              | PowerEx Mid-Columbia WSPP Product Definitions |  |
| AWEC/104              | Production Tax Credit Rate Forecast for 2024  |  |
| Confidential AWEC/105 | Beaver Cycling History                        |  |

| <u>Exhibit</u> | <u>Description</u>                                    |
|----------------|---|
| AWEC/106       | Oregonian Articles Discussing Biglow Turbine Failures |
| AWEC/400       | Rebuttal NVPC Testimony of Bradley G. Mullins         |

The Affidavit of Bradley G. Mullins attesting to the truth and accuracy of his testimony and exhibit filings, including his testimony in support of the stipulations filed in this proceeding, is attached.

Dated this 23rd day of August, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Brent L. Coleman

Brent L. Coleman
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Of Attorneys for the
Alliance of Western Energy Consumers

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

|                                      | UE 416 |                                      |
|--------------------------------------|--------|--------------------------------------|
| In the Matter of                     | )      |                                      |
| Portland General Electric Company,   | )      | DECLARATION OF<br>BRADLEY G. MULLINS |
| Request for a General Rate Revision. | )      |                                      |
|                                      | )      |                                      |

I, BRADLEY G. MULLINS, state the following, under penalty of perjury under the laws of the State of Oregon:

- 1. My name is Bradley G. Mullins. 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 Net Variable Power Cost testimony and exhibits in this proceeding (AWEC/100-106, AWEC/400, Stipulating Parties/100-102, and Stipulating Parties/200-202).
- 3. To the best of my knowledge, my testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 23rd day of August, 2023.

Bradley G. Mullins
BRADLEY G. MULLINS