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**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

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In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Request for a General Rate Revision.

Docket No. UE 416

**MOTION TO ADMIT PRE-FILED  
TESTIMONY AND EXHIBITS OF  
WALMART INC.**

Walmart Inc. (“Walmart”) moves for admission into the record of this proceeding the following pre-filed testimony and exhibits submitted on behalf of Walmart.

Exhibit	Description
Walmart/100	Direct Testimony and Exhibits of Steve W. Chriss
Walmart/101	Witness Qualifications Statement, Steve W. Chriss
Walmart/200	Direct Testimony and Exhibits of Alex J. Kronauer
Walmart/201	Witness Qualifications Statement, Alex J. Kronauer
Walmart/202	Impact of PGE’s Proposed Return on Equity vs. PGE’s Currently Approved Return on Equity
Walmart/203	Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present
Walmart/204	Calculation of Revenue Requirement Impact of PGE’s Proposed ROE vs. Average ROE Awarded to Vertically Integrated Utilities from 2019-Present

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The Affidavits of Steve W. Chriss and Alex J. Kronauer attesting to the truth and accuracy of their testimony and exhibit filings, including any sponsored testimony in support of the stipulations filed in this proceeding, are attached.

DATED this 17th day of October, 2023.

PARSONS BEHLE & LATIMER

/s/ Justina A. Caviglia  
Justina A. Caviglia, *Pro Hac Vice*  
Nevada Bar No. 9999  
50 W. Liberty St., Suite 750  
Reno, Nevada 89501  
Telephone: 775.323.1601  
Email: jcaviglia@parsonsbehle.com

Attorneys for Walmart Inc.

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Docket No. UE 416

**DECLARATION OF STEVE W. CHRISS**

I, STEVE W. CHRISS, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Steve W. Chriss. I am the Senior Director, Utility Partnerships at Walmart Inc. (“Walmart”).

2. On behalf of Walmart, I sponsored General Rate Case testimony and exhibits in this proceeding (Walmart/100-101, Stipulating Parties/100-102, Stipulating Parties/200-202, Stipulating Parties/300-302, and Stipulating Parties/400-403).

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.

DATED this 17th day of October, 2023.

/s/ Steve W. Chriss  
Steve W. Chriss

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**DECLARATION OF ALEX J.  
KRONAUER**

I, ALEX J. KRONAUER, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Alex J. Kronauer. I am the Senior Manager, Utility Partnerships at Walmart Inc. (“Walmart”).
2. On behalf of Walmart, I sponsored General Rate Case testimony and exhibits in this proceeding (Walmart/200-204).
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.

DATED this 17th day of October, 2023.

*/s/ Alex J. Kronauer*

Alex J. Kronauer