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October 16, 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 General Rate Case 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/200	Opening General Rate Case Testimony of Bradley G. Mullins
AWEC/201	Revenue Requirement Calculations
AWEC/202	PGE Responses to Data Requests
Confidential AWEC/203	Property Insurance Analysis
AWEC/204	OATT Revenue Deferral and Amortization
Highly Confidential/Confidential AWEC/300	Opening General Rate Case Testimony of Lance D. Kaufman

<u>Exhibit</u>	<u>Description</u>
AWEC/301	Qualification Statement of Lance D. Kaufman
Highly Confidential/Confidential AWEC/302	Discovery Responses
Confidential AWEC/303	Generation Marginal Cost
Confidential AWEC/304	Faraday Incremental Energy
Confidential AWEC/305	Faraday Economic Analysis
Confidential AWEC/306	Beaver Economic Analysis
Confidential AWEC/307	UE 394 World Trade Center Confidential Testimony
AWEC-CUB/100	Opening General Rate Case Testimony of Christopher C. Walters
AWEC-CUB/101	Qualifications of Christopher C. Walters
AWEC-CUB/102	Valuation Metrics
AWEC-CUB/103	Proxy Group
AWEC-CUB/104	Analyst Growth Rates

<u>Exhibit</u>	<u>Description</u>
AWEC-CUB/105	Constant Growth DCF
AWEC-CUB/106	Payout Ratios
AWEC-CUB/107	Sustainable Growth Rates
AWEC-CUB/108	Sustainable Growth DCF
AWEC-CUB/109	Multi-Stage DCF
AWEC-CUB/110	M/B Ratio
AWEC-CUB/111	Risk Premium - Treasury Bonds
AWEC-CUB/112	Risk Premium - Utility Bonds
AWEC-CUB/113	Yield Spreads
AWEC-CUB/114	Current Bond Yields
AWEC-CUB/115	BETA
AWEC-CUB/116	CAPM

<u>Exhibit</u>	<u>Description</u>
AWEC-CUB/200	Rebuttal General Rate Case Testimony of Christopher C. Walters
Confidential AWEC/600	Rebuttal General Rate Case Testimony of Bradley G. Mullins
Confidential AWEC/700	Rebuttal General Rate Case Testimony of Lance D. Kaufman
Confidential AWEC/701	PGE Responses to Data Requests
AWEC/800	Supplemental Rebuttal General Rate Case Testimony of Lance D. Kaufman

The Affidavits of Bradley G. Mullins, Lance D. Kaufman and Christopher C. Walters 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 16th day of October, 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)	
)	DECLARATION OF
Portland General Electric Company,)	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 General Rate Case testimony and exhibits in this proceeding (AWEC/200-204, AWEC/600 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.

SIGNED this 16th day of October, 2023.

Bradley G. Mullins

BRADLEY G. MULLINS

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 416

In the Matter of)	
)	DECLARATION OF
Portland General Electric Company,)	LANCE D. KAUFMAN
)	
Request for a General Rate Revision.)	
)	
_____)	

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 General Rate Case testimony and exhibits in this proceeding (AWEC/300-307, AWEC/700, AWEC/800 and Stipulating Parties/300-302).
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 16th day of October, 2023.

Lance D. Kaufman

LANCE D. KAUFMAN

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 416

In the Matter of)	
)	DECLARATION OF
Portland General Electric Company,)	CHRISTOPHER C. WALTERS
)	
Request for a General Rate Revision.)	
)	
_____)	

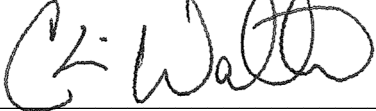
I, CHRISTOPHER C. WALTERS, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Christopher C. Walters. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers and the Oregon Citizens’ Utility Board (“AWEC-CUB”) in this matter.

2. On behalf of AWEC-CUB, I sponsored General Rate Case testimony and exhibits in this proceeding (AWEC-CUB/100-116 and AWEC-CUB/200).

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 16th day of October, 2023.



CHRISTOPHER C. WALTERS