

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 416**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision; and
2024 Annual Power Cost Update.

**PORTLAND GENERAL ELECTRIC
COMPANY'S MOTION TO ADMIT PRE-
FILED TESTIMONY AND EXHIBITS**

Pursuant to OAR 860-001-0420, Portland General Electric Company (PGE) moves for admission of the following pre-filed testimony and exhibits into the above captioned proceeding:

Exhibit No.	Description	# of Pages
PGE/0300	Direct Testimony of Schwartz, Outama, Cristea (Feb. 15, 2023)	58
PGE/0301	Minimum Filing Requirements, UE 198, Order No. 08-505, Appendix A	12
PGE/1500	Reply Testimony of Outama, Pedersen, Cristea (Jun. 21, 2023)	41
PGE/1501	Flexibility Reserves Modeling: Technical Description of PGE's Analysis	3
PGE/3000	Surrebuttal Testimony of Pedersen, Vhora, Cristea (Aug. 10, 2023)	35
PGE/3001	EIM Methodology Workshop Presentation (Jan. 2021)	21
PGE/3002	Cost for Flexibility Reserves Allocated to PGE Thermal Resources	1
PGE/3003	Ancillary Services Model White Paper (Feb. 15, 2023)	12

This motion is supported by the declarations of PGE's witnesses attesting that their pre-filed testimony and exhibits are true and correct.

DATED this 23rd day of August, 2023.

Respectfully Submitted,



Kim S. Burton, OSB #221958
Assistant General Counsel III
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
Phone: 573.356.9688
Email: kim.burton@pgn.com

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DECLARATION OF STEFAN CRISTEA

I, Stefan Cristea, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Stefan Cristea. I am a Regulatory Consultant in the Rates and Regulatory Affairs Department at Portland General Electric Company (PGE).
2. On behalf of PGE I sponsored Net Variable Power Cost Opening, Reply, and Surrebuttal Testimony, PGE/300, PGE/1500, and PGE/3000, in this proceeding.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

DATED this 23rd day of August, 2023.

Respectfully submitted,

/s/ Stefan Cristea
Stefan Cristea

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DECLARATION OF ELIZABETH
PEDERSEN

I, Elizabeth Pedersen, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Elizabeth Pedersen. My position is Manager General Accounting in the Gross Margin & Power Cost Forecast Department at Portland General Electric Company (PGE).
2. On behalf of PGE I sponsored Net Variable Power Cost Reply and Surrebuttal Testimony in this proceeding, PGE/1500 and PGE/3000.
3. I have reviewed and adopt the Opening Testimony of Erin Schwartz in this proceeding, PGE/300.
4. To the best of my knowledge and belief, the testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

DATED this 23rd day of August, 2023.

Respectfully submitted,

/s/ Elizabeth Pedersen

Elizabeth Pedersen

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DECLARATION OF DARRINGTON
OUTAMA

I, Darrington Outama, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Darrington Outama. I am a Senior Director in the Power Operations Department at Portland General Electric Company (PGE).
2. On behalf of PGE I sponsored Net Variable Power Cost Opening and Reply Testimony, PGE/300 and PGE/1500, in this proceeding.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

DATED this 23rd day of August, 2023.

Respectfully submitted,

/s/ Darrington Outama
Darrington Outama

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DECLARATION OF SOPHIYA VHORA

I, Sophiya Vhora, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Sophiya Vhora. My position is Manager, Trading Strategy and Analytics in the Power Operations Department at Portland General Electric Company (PGE).
2. On behalf of PGE I sponsored Net Variable Power Cost Surrebuttal Testimony, PGE/3000, in this proceeding.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

DATED this 23rd day of August, 2023.

Respectfully submitted,

/s/Sophiya Vhora
Sophiya Vhora