



<b>Exhibit No.</b>	<b>Description</b>
Environmental Intervenors/209	Excerpts of PSE Settlement Order UE-220066
Environmental Intervenors/210	Avista Response to DR EG-014 Supplemental
Environmental Intervenors/211	Avista Response to DR CUB-001 Supplemental
Environmental Intervenors/212	Avista Response to DR CUB-001 Attachment A
Environmental Intervenors/213	Avista Response to DR CUB-002
Environmental Intervenors/214	Avista Response to DR EG-013
Environmental Intervenors/215	Avista Response to DR Staff-184
Environmental Intervenors/216	Avista Response to DR Staff-184 Attachment A
Environmental Intervenors/217	Avista Response to DR EG-015
<b>Environmental Intervenors/300</b>	<b>Greer Ryan Opening Testimony</b>
Environmental Intervenors/301	Greer Ryan Qualification Statement
Environmental Intervenors/302	Greer Ryan CV
Environmental Intervenors/303	Avista Response to DR EG-025
Environmental Intervenors/304	Avista Response to DR DR-057
Environmental Intervenors/305	Staff_DR_057 Attachment A_EXCERPTS_Baker Botts1.xlsx
Environmental Intervenors/306	Avista Response to DR EG-066
Environmental Intervenors/307	Avista Response to DR EG-002
Environmental Intervenors/308	Avista Response to DR EG-002 Attachment D - RNG 2022 Individual Responses
Environmental Intervenors/309	Avista Response to DR EG-021
Environmental Intervenors/310	Avista Response to DR EG-021 Attachment A
Environmental Intervenors/311	Avista Response to DR EG-068
Environmental Intervenors/312	AGA - Form 990 - 2021
Environmental Intervenors/313	FERC_Petition_Exhibit_B_Additional_Associations
Environmental Intervenors/314	AGA Gas Stove Report
Environmental Intervenors/315	HB 3409 Letter
Environmental Intervenors/316	Lobbying Email
Environmental Intervenors/317	Avista Response to DR EG-022
Environmental Intervenors/318	Avista Response to DR EG-067C
Environmental Intervenors/319	Avista Response to DR EG-067C Confidential Attachment A - AGA - 2023 Membership Dues Invoice
Environmental Intervenors/320	Avista Response to DR EG-067C Confidential Attachment B - NWGA - 2023 Membership Dues Invoice
Environmental Intervenors/321	Staff_DR_057 Attachment A_EXCERPTS_Other Association Expenses.xlsx
Environmental Intervenors/322	Joint Letter from Labor Unions & Business RE Decarbonization Bills
Environmental Intervenors/323	Avista Response to DR Staff-104

<b>Exhibit No.</b>	<b>Description</b>
Environmental Intervenors/324	Staff_DR_104 Attachment A.xls
Environmental Intervenors/325	Avista Response to DR EG-084 Attachment A - #1 10_22_OR
Environmental Intervenors/326	Avista Response to DR EG-084 Attachment A - Community Ad 0412
Environmental Intervenors/327	Avista Response to DR EG-084 Attachment A - #2 09_22_OR
Environmental Intervenors/328	Avista Response to DR EG-084 Attachment A - #3 06_22_OR
Environmental Intervenors/329	Avista Response to DR Staff-173
Environmental Intervenors/330	Avista Response to DR Staff-173 Attachment A
Environmental Intervenors/331	2022.03.18 Initiating Document - Petition for Judicial Review COA No. A178217
<b>Environmental Intervenors/400</b>	<b>Benedikt Springer Opening Testimony</b>
Environmental Intervenors/401	Benedikt Springer Qualification Statement
Environmental Intervenors/402	Benedikt Springer Resume
Environmental Intervenors/403	Avista LINA
Environmental Intervenors/404	Avista Email

This Motion to Admit Pre-Filed Testimony and Exhibits is supported by Declarations of Bradley Cebulko, Carra Sahler, Greer Ryan, and Benedikt Springer. These witnesses attest to the truthfulness of their testimony in each declaration. The Declarations are attached hereto.

Dated this 14th day of September, 2023.

/s/ Noelia Gravotta

Jaimini Parekh

Senior Attorney, OSB No. 226337

Jan Hasselman

Senior Attorney, WSBA No. 29107

(admitted *pro hac vice*)

Noelia Gravotta, WSBA No. 60089

(admitted *pro hac vice*)

Earthjustice

810 Third Avenue, Suite 610

Seattle, WA 98104

206-343-7340

[jporekh@earthjustice.org](mailto:jporekh@earthjustice.org)

[jhasselman@earthjustice.org](mailto:jhasselman@earthjustice.org)

[ngravotta@earthjustice.org](mailto:ngravotta@earthjustice.org)

ENVIRONMENTAL INTERVENORS' MOTION TO ADMIT  
PRE-FILED TESTIMONY AND EXHIBITS - 3  
UG 461

Earthjustice  
810 Third Ave. Suite 610  
Seattle, WA 98104  
(206) 343-7340

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 461**

In the Matter of	)	DECLARATION OF
	)	BRADLEY CEBULKO
AVISTA CORPORATION, dba	)	
AVISTA UTILITIES,	)	
	)	
Request for a General Rate Revision.	)	
_____	)	

I, Bradley Cebulko, do hereby declare and say:

1. My name is Bradley Cebulko, and I am a Senior Manager at Strategen Consulting. I am appearing in this proceeding for Sierra Club and Climate Solutions (“Environmental Intervenors”). My business address is 10265 Rockingham Dr. Ste. 100-4061, Sacramento, CA 95827.
2. I submit this declaration in support of Environmental Intervenors’ Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored testimony and exhibits in this docket numbered Environmental Intervenors/100 through Environmental Intervenors/111.
4. The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 14th day of September, 2023.

/s/ Bradley Cebulko  
Bradley Cebulko

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 461**

In the Matter of	)	DECLARATION OF
	)	CARRA SAHLER
AVISTA CORPORATION, dba	)	
AVISTA UTILITIES,	)	
	)	
Request for a General Rate Revision.	)	
_____	)	

I, Carra Sahler, do hereby declare and say:

1. My name is Carra Sahler, and I am the Interim Director and Staff Attorney for the Green Energy Institute at Lewis & Clark Law School. I am appearing in this proceeding for Sierra Club and Climate Solutions (“Environmental Intervenors”). My business address is 10101 S. Terwilliger Blvd., Portland, Oregon 97219.
2. I submit this declaration in support of Environmental Intervenors’ Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored testimony and exhibits in this docket numbered Environmental Intervenors/200 through Environmental Intervenors/217.
4. The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 14th day of September, 2023.

/s/ Carra Sahler  
Carra Sahler

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 461**

In the Matter of	)	DECLARATION OF
	)	GREER RYAN
AVISTA CORPORATION, dba	)	
AVISTA UTILITIES,	)	
	)	
Request for a General Rate Revision.	)	
_____	)	

I, Greer Ryan, do hereby declare and say:

1. My name is Greer Ryan, and I am the Clean Buildings Policy Manager for Climate Solutions. I am appearing in this proceeding for Sierra Club and Climate Solutions (“Environmental Intervenors”). My business address is 1300 SE Stark St. #207, Portland, Oregon 97214.
2. I submit this declaration in support of Environmental Intervenors’ Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored testimony and exhibits in this docket numbered Environmental Intervenors/300 through Environmental Intervenors/331.
4. The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.



I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 14th day of September, 2023.

/s/ Greer Ryan  
Greer Ryan

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 461**

In the Matter of	)	DECLARATION OF
	)	BENEDIKT SPRINGER
AVISTA CORPORATION, dba	)	
AVISTA UTILITIES,	)	
	)	
Request for a General Rate Revision.	)	
_____	)	

I, Benedikt Springer, do hereby declare and say:

1. My name is Benedikt Springer, and I am a Utility Policy Analyst for Community Action Partnership of Oregon (CAPO). I am appearing in this proceeding for Sierra Club and Climate Solutions (“Environmental Intervenors”). My business address is 2475 Center Street NE, Salem, Oregon 97301.
2. I submit this declaration in support of Environmental Intervenors’ Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored testimony and exhibits in this docket numbered Environmental Intervenors/400 through Environmental Intervenors/404.
4. The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 14th day of September, 2023.

/s/ Benedikt Springer  
Benedikt Springer