



CITY OF
PORTLAND, OREGON
OFFICE OF THE CITY ATTORNEY

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April 19, 2024

VIA EMAIL - puc.filingcenter@puc.oregon.gov
Public Utility Commission of Oregon
ATTN: Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: NC 405 - In the Matter of Public Utility Commission of Oregon v. City of
Portland

Dear Filing Center:

The City of Portland respectfully submits its Motion to Admit with declarations regarding
NC 405.

Sincerely,

/s/ Eric Shaffner

Eric Shaffner
Deputy City Attorney

ES/kts

1
2 **BEFORE THE PUBLIC UTILITY COMMISSION**
3 **OF OREGON**

4 **NC 405**

5 PUBLIC UTILITY COMMISSION OF
6 OREGON,

7 Complainant,

8 v.

9 THE CITY OF PORTLAND,

10 Defendant.

CITY OF PORTLAND'S MOTION TO
ADMIT TESTIMONY

11 The City of Portland asks the Administrative Law Judge to admit into the record of
12 the above-captioned docket the exhibits listed below:

13 COP 100-103	The pre-filed response testimony and exhibits of Melanie Gualotunia
14 COP 200	The pre-filed response testimony of Paul Suto
15 COP 300	The pre-filed response testimony of Lynda Hofmann
16 COP 400 - 402	The pre-filed bench response testimony and exhibits of Melanie Gualotunia
17 COP 500	The pre-filed bench response testimony of Lynda Hofmann
18 COP 600	The pre-filed reply testimony of Justin Buchanan
	The pre-filed City of Portland's Answer, Declaration of Lynda Hofmann and exhibits

19 The City's testimony and witness qualifications statement are supported by declarations
20 attesting to the truthfulness of statements therein. The declarations are attached to this motion.

21 Dated this 19th day of April, 2024.

22 Respectfully submitted,

23 /s/ Eric Shaffner

24 Eric Shaffner, OSB No. 081238

25 Senior Deputy City Attorney

26 Email: eric.shaffner@portlandoregon.gov

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

NC 405

PUBLIC UTILITY COMMISSION OF
OREGON,

Complainant,

v.

CITY OF PORTLAND,

Defendant.

DECLARATION OF MELANIE
GUALOTUNIA

I, Melanie Gualotunia, hereby declare as follows:

1. I am an Engineering Supervisor for the Bureau of Environmental Services, City of Portland. My business address is 1120 SW 5th Ave, Suite 765, Portland, Oregon 97204.

2. On behalf of the City of Portland, I co-sponsored response testimony and exhibits in the above-captioned docket, pre-filed as COP/100-103 and bench response testimony and exhibits, pre-filed as COP/400-402.

To the best of my knowledge, my pre-filed response testimony, bench response testimony and all exhibits are true and accurate.

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I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: April 19th, 2024

/s/ Melanie Gualotunia
Melanie Gualotunia

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

NC 405

PUBLIC UTILITY COMMISSION OF
OREGON,

Complainant,

v.

CITY OF PORTLAND,

Defendant.

DECLARATION OF PAUL SUTO

I, Paul Suto, hereby declare as follows:

1. I am the Chief Engineer of the Bureau of Environmental Services, City of
Portland. My business address is 1120 SW 5th Avenue, Suite 765, Portland, OR 97204.

2. On behalf of the City of Portland, I co-sponsored response testimony in the
above-captioned docket, pre-filed as COP/200.

To the best of my knowledge, my pre-filed response testimony is true and accurate.

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I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: April 19th, 2024

/s/ Paul Suto

Paul Suto

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

NC 405

PUBLIC UTILITY COMMISSION OF
OREGON,

Complainant,

v.

CITY OF PORTLAND,

Defendant.

DECLARATION OF LYNDA HOFMANN

I, Lynda Hofmann, hereby declare as follows:

1. I am a Maintenance Supervisor for the Portland Bureau of Transportation (“PBOT). I have held this position since 2018. At all times relevant to this matter, I held the position of Utility Locates Supervisor. In that role, I oversaw the Utility Locates group at PBOT, which is responsible for performing utility locates on behalf of the City, for a period of seven months.

2. On behalf of the City of Portland, I co-sponsored witness testimony in the above-captioned docket, pre-filed as Defendant City of Portland’s Answer and Declaration of Lynda Hofmann, response testimony, pre-filed as COP/300 and bench response testimony, pre-filed as COP/500.

To the best of my knowledge, my pre-filed witness testimony, declaration and bench response testimony are true and accurate.

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I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: April 19th, 2024

/s/ Lynda Hofmann
Lynda Hofmann

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

NC 405

PUBLIC UTILITY COMMISSION OF
OREGON,

Complainant,

v.

CITY OF PORTLAND,

Defendant.

DECLARATION OF JUSTIN BUCHANAN

I, Justin Buchanan, hereby declare as follows:

1. I am a Maintenance Supervisor for the Bureau of Transportation, City of Portland.

My business address is 2929 N Kerby Avenue in Portland.

2. On behalf of the City of Portland, I co-sponsored reply testimony in the above-captioned docket, pre-filed as COP/600.

To the best of my knowledge, my pre-filed reply testimony is true and accurate.

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I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: April 19th, 2024

/s/ Justin Buchanan
Justin Buchanan
