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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

NC 405

PUBLIC UTILITY COMMISSION OF  
OREGON,

Complainant,

v.

CITY OF PORTLAND,

Defendant.

OREGON ASSOCIATION OF  
CLEAN WATER AGENCIES'  
MOTION TO ADMIT  
TESTIMONY

The Oregon Association of Clean Water Agencies (ACWA) asks the Administrative Law Judge to admit into the record of the above-captioned docket the exhibits listed below:

- ACWA 100: The pre-filed response testimony of Susie Smith
- ACWA 200: The pre-filed response testimony of Steve Fancher
- ACWA 300: The pre-filed response testimony of Jennifer Wirsing
- ACWA 400: The pre-filed response testimony of Jessica MacClanahan

ACWA's testimony and witness qualification statements are supported by the attached declarations attesting to the truthfulness of statements therein.

Dated this 22<sup>nd</sup> day of April, 2024.

Respectfully submitted,

/s/ Laura Maffei  
Laura Maffei, OSB No. 993177  
Cable Huston LLP  
Attorney for ACWA  
lmaffei@cablehuston.com

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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 STEVE  
FANCHER

I, Steve Fancher, hereby declare as follows:

1. I am Assistant City Manager for the City of Gresham. My business address is 1333 NW Eastman Pkwy, Gresham, Oregon.

2. On behalf of the Oregon Association of Clean Water Agencies, I co-sponsored response testimony in the above-captioned docket, pre-filed as ACWA/200.

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

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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 JESSICA  
MACCLANAHAN

I, Jessica MacClanahan, hereby declare as follows:

1. I am the Director of Public Works/City Engineer for the City of Redmond. My business address is 243 E. Antler Ave. Redmond, OR 97756.

2. On behalf of the Oregon Association of Clean Water Agencies, I co-sponsored response testimony in the above-captioned docket, pre-filed as ACWA/400.

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

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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 SUSIE  
SMITH

I, Susie Smith, hereby declare as follows:

1. I am the former Executive Director of Oregon Association of Clean Water Agencies (ACWA), located at 81 E. 14th Avenue in Eugene, Oregon 97401.

2. On behalf of the Oregon Association of Clean Water Agencies, I co-sponsored response testimony in the above-captioned docket, pre-filed as ACWA/100.

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

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

4 DATED: April 22<sup>th</sup>, 2024

5 /s/ Susie Smith

6 Susie Smith

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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 JENNIFER  
WIRSING

I, Jennifer Wirsing, hereby declare as follows:

1. I am the City Engineer/Deputy Director for the Public Works and Community Development Department for the City of Coos Bay. My business address is 500 Central Avenue, Coos Bay OR 97420.

2. On behalf of the Oregon Association of Clean Water Agencies, I co-sponsored response testimony in the above-captioned docket, pre-filed as ACWA/300.

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

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

4 DATED: April 22<sup>th</sup>, 2024

5 */s/ Jennifer Wirsing*

6 Jennifer Wirsing  
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