

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

3 **NC 405**

4 PUBLIC UTILITY COMMISSION
5 OF OREGON,

6 Complainant,

7 vs.

8 CITY OF PORTLAND ACTING THROUGH
9 BUREAU OF ENVIRONMENTAL
10 SERVICES.

11 Defendant.

12 STAFF MOTION TO ADMIT EXHIBITS

13 Staff of the Public Utility Commission of Oregon asks the Administrative Law Judge to
14 admit the following exhibits into the record in the above-captioned case:

15 Exhibit No.	16 Description
17 Staff 100	18 Opening Testimony of Kevin Hennessy
19 Staff 101	20 Letter to Dawn Uchiyama, Interim Director, City of Portland Bureau of 21 Environmental Services, from Kevin Hennessy, with enclosures (July 18, 22 2022)
23 Staff 102	24 Emails to Scott Donnell from City of Portland Bureau of Environmental 25 Services and Eric Shaffner
26 Staff 103	27 Oregon Utility Notification Center Order No. 97-001 adopting Oregon 28 Administrative Rules
29 Staff 104	30 Portland City Code 17.32.070
31 Staff 105	32 Revocable Permit to use Dedicated Street Areas issued to Scott Donnell
33 Staff 200	34 Reply Testimony of Kevin Hennessy
35 Staff 201	36 Portland General Electric Company Protocols related to compliance with 37 Oregon Administrative Rules established by Oregon Utility Notification 38 Center
39 Staff 202	40 NW Natural Gas Company "Tips of the Trade"
41 Staff 300	42 Staff Response to Bench Request

1 Staff Exhibits 100, 200, and 300, Kevin Hennessy Opening and Reply Testimony
2 Hennessy, and Staff Response to Bench Request are supported by the attestation of Kevin
3 Hennessy attached to this motion.

4 **CONCLUSION**

5 Staff asks the Administrative Law Judge to admit the Staff exhibits listed above into the
6 record.

7
8 SIGNED this 24th day of April 2024.

9 Respectfully submitted,

10 ELLEN F. ROSENBLUM
11 Attorney General

12 */s/ Stephanie S. Andrus*

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Stephanie S. Andrus, OSB No. 925123
14 Sr. Assistant Attorney General
15 Of Counsel for Attorneys of Oregon Public
16 Utility Commission Staff

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF OREGON**

NC 405

PUBLIC UTILITY COMMISSION OF OREGON,)	
)	
Complainant,)	ATTESTATION OF KEVIN HENNESSY
vs.)	
)	
CITY OF PORTLAND ACTING THROUGH BUREAU OF ENVIRONMENTAL SERVICES.)	
)	
Defendant.)	
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I, KEVIN HENNESSY, attest to the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Kevin Hennessy, I am the Chief of Pipeline Safety of the Utility Safety, Reliability, and Security Division of the Oregon Public Utility Commission (OPUC).
2. On behalf of Staff of the Oregon Public Utility Commission, I sponsored Opening and Reply Testimony in this proceeding (Staff/100 and Staff/200), and the Staff Response to Bench Request (Staff/300).
3. To the best of my knowledge, my testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

I hereby declare that the above statements are true to the best of my knowledge and belief, and I understand it is made for use as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

DATED this 24th day of April 2024.

/s/ Kevin Hennessy

Kevin Hennessy

ATTESTATION OF KEVIN HENNESSY