



KATHERINE MCDOWELL  
Direct (503) 595-3924  
katherine@mrg-law.com

February 7, 2022

**VIA ELECTRONIC FILING**

Attention: Filing Center  
Public Utility Commission of Oregon  
P.O. Box 1088  
Salem, Oregon 97308-1088

**Re: UE 394 – *In the Matter of Portland General Electric Company, Request for a General Rate Revision.***

Attention Filing Center:

Attached for filing in the above-referenced docket is Portland General Electric Company's Cross-Examination Statement and List of Pre-Filed Exhibits to be Entered into the Record.

Please contact this office with any questions.

Sincerely,

Katherine McDowell

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 394**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Request for a General Rate Revision.

**PORTLAND GENERAL ELECTRIC  
COMPANY'S CROSS-EXAMINATION  
STATEMENT AND LIST OF  
PRE-FILED EXHIBITS TO BE  
ENTERED INTO THE RECORD**

In accordance with Administrative Law Judge (ALJ) Lackey's February 1, 2022, Pre-hearing Memorandum, Portland General Electric Company (PGE) submits its Cross-Examination Statement to the Public Utility Commission of Oregon, along with its Exhibit List.

PGE waives cross-examination of all witnesses in this case. PGE reserves the right to ask follow-up questions of any witness who is cross-examined at the hearing by another party, the ALJ, or any Commissioner. PGE is not submitting a list of PGE participants who will attend confidential sessions at this time because PGE understands that none of the designated cross implicates confidential information; if this is incorrect, PGE will promptly submit a confidential session participant list. PGE will be represented at hearing by the undersigned counsel.

PGE has no cross-examination exhibits. PGE requests admission into the record of the following pre-filed exhibits:

\* Exhibits adopted in their entirety by another witness are listed under the adopting witness.

<b>Maria Pope, President and Chief Executive Officer of PGE, and Brett Sims, Vice President (VP) of Strategy, Regulation and Energy Supply for PGE – Policy</b>	
PGE/100	PGE Direct Testimony of Maria Pope and Brett Sims
PGE/1300	Reply Testimony of Maria Pope and Brett Sims
<b>Alex Tooman, Ph.D., Senior Regulatory Consultant for PGE, and Greg Batzler, Regulatory Consultant for PGE – Revenue Requirement</b>	
PGE/200	Direct Testimony of Alex Tooman, Ph.D. and Greg Batzler
PGE/201	2022 Results of Operations Summary
PGE/202	Summary of Other Revenue

PGE/203	Summary of Depreciation Expense
PGE/204	Summary of Amortization Expense
PGE/205	Summary of Income Taxes
PGE/206	Summary of Taxes Other Than Income
PGE/207	Summary of Rate Base
PGE/208	Rate Base Comparison
PGE/209	Production Tax Credits
PGE/210	Unbundled Results Summary
PGE/1400	Reply Testimony of Alex Tooman and Greg Batzler
PGE/1401	PGE Current Revenue Requirement
PGE/1402	Other Revenue Analysis
PGE/1403	1979-2008 Events
PGE/1404	2014-2021 Events
PGE/1405	1996-2021 Event Costs
PGE/1406	PGE's Response to AWEC Data Request No. 206
PGE/1407	PGE's Response to AWEC Data Request No. 208
<b>Anne Mersereau, VP of Human Resources, Diversity, and Inclusion for PGE, and Tamara Neitzke, Director of Total Compensation and Benefits in the Human Resources Department for PGE – Compensation</b>	
PGE/300	Direct Testimony of Anne Mersereau and Tamara Neitzke (Revised by Errata filing 8/13/21)
PGE/301	PGE Total Compensation Costs – 2018 Actuals to 2022 Test Year (Revised by Errata filing 8/13/21)
PGE/302	PGE Total Labor Costs – 2018 Actuals to 2022 Test Year
PGE/303C	CONFIDENTIAL 2020 BENVAl Ranking – Entire Benefit Program
PGE/1500	Reply Testimony of Anne Mersereau and Tamara Neitzke
PGE/1501	PGE Unconstrained Calculation of PUC 3-Year Wage and Overtime Formula
PGE/1502	PGE Calculation of PUC 3-Year Incentives Model
PGE/1503	September 2021 Oregon Economic and Revenue Forecast
PGE/1504	December 2021 Oregon Economic and Revenue Forecast
PGE/1505C	CONFIDENTIAL Report on Long-Term Economic Variables
<b>Jim Ajello, Senior VP, Chief Financial Officer and Treasurer for PGE, and Greg Batzler – Corporate Support</b>	
PGE/400	Direct Testimony of Jim Ajello and Greg Batzler (Revised by Errata filing 8/13/21)
PGE/401	Summary of A&G Costs (Revised by Errata filing 8/13/21)
PGE/402	PGE Insurance Policies List
PGE/403C	CONFIDENTIAL Summary of Insurance Costs
PGE/404	WTC Rent Allocation
PGE/405	Direct and Allocated IT Charges
PGE/1600	Reply Testimony of Jim Ajello and Greg Batzler

PGE/1601C	CONFIDENTIAL PGE's Response to OPUC SDR No. 057
PGE/1602	PGE's Response to OPUC SDR No. 058
PGE/1603C	CONFIDENTIAL Detail Regarding PGE's A&G Non-Labor Expenses
PGE/1604C	CONFIDENTIAL PGE's Response to AWEC DR No. 182
PGE/1605C	CONFIDENTIAL PGE's Response to AWEC DR No. 254
PGE/1606	PGE's Response to AWEC DR No. 133
PGE/1607C	CONFIDENTIAL PGE's Response to OPUC DR No. 790
<b>Jason Salmi Klotz, Principal Product Development Specialist in PGE's Product Portfolio Management Group – Flexible Load Plan</b>	
PGE/600	Direct Testimony of Jason Salmi Klotz
PGE/601	UM 2141 Flexible Load Plan
PGE/602	Exploring Pathways to Deep Decarbonization for the Portland General Electric Service Territory
<b>Jardon Jaramillo, Senior Director of Treasury, Investor Relations, and Risk Management at PGE; Jaki Ferchland, Manager of Revenue Requirement in Regulatory Affairs at PGE; and Bente Villadsen, Principal of The Brattle Group – Cost of Capital</b>	
PGE/900	Direct Testimony of Jardon Jaramillo, Jaki Ferchland, and Bente Villadsen (Revised by Errata filing 8/13/21)
PGE/901C	CONFIDENTIAL Cost of Long-Term Debt
PGE/902	Standard & Poor's and Moody's Investors Service Credit Ratings
PGE/903	Cost of Equity Estimates – Electric Sample
PGE/904	Cost of Equity Estimates – Natural Gas and Water Sample
PGE/905	Technical Appendix
PGE/906	Villadsen Resume
<b>Amber Riter, Economist and Lead Load Forecasting Analyst at PGE – Load Forecast</b>	
PGE/1000	Direct Testimony of Amber Riter (Revised by Errata filing 8/13/21)
PGE/1001	Energy Deliveries Forecast, Base
PGE/1002	Energy Deliveries Forecast, Final
PGE/1003	Energy Efficiency Adjustment
PGE/1004	New Connects
PGE/1005	Residential Usage
PGE/1006	Commercial NAICS Groups
PGE/1007	Manufacturing NAICS Groups
PGE/1008	Miscellaneous MWh
PGE/1009	Total Net System Deliveries
PGE/1010	Split between Cost-of-Service and Direct Access
PGE/1011	Degree Days for 2021-2022
PGE/1012	COVID-19 Control Variables
PGE/1013	Forecast Accuracy
PGE/2100	Reply Testimony of Amber Riter

PGE/2101	Energy Deliveries Forecast, Base
PGE/2102	Energy Deliveries Forecast, Final
PGE/2103	Energy Efficiency Adjustment
PGE/2104	New Connects
PGE/2105	Residential Usage
PGE/2106	Commercial NAICS Groups
PGE/2107	Manufacturing NAICS Groups
PGE/2108	Miscellaneous MWh
PGE/2109	Total New System Deliveries
PGE/2110	Split between Cost-of-Service and Direct Access
PGE/2111	Degree Days for 2021-2022
PGE/2112	COVID-19 Control Variables
<b>Robert Macfarlane, Manager of Pricing and Tariffs for PGE, and Christopher Pleasant, Senior Regulatory Analyst in Pricing and Tariffs for PGE – Marginal Cost of Service</b>	
PGE/1100	Direct Testimony of Robert Macfarlane and Christopher Pleasant
PGE/1101	Marginal Cost Study
PGE/1102	PGE’s Draft Near Term Local Transmission Plan
<b>Robert Macfarlane and Teresa Tang, Regulatory Consultant in Pricing and Tariffs for PGE – Pricing</b>	
PGE/1200	Direct Testimony of Robert Macfarlane and Teresa Tang
PGE/1201	Proposed Tariff Changes
PGE/1202	Estimated Impact of Proposed Changes on Customers
PGE/1203	Rate Design
PGE/1204	Allocation of Costs to Customer Classes
PGE/1205	Multi-family vs Single-family Basic Charges
PGE/1206	Streetlight and Area Lights
PGE/1207	Line Extension Calculations
PGE/1208	Line Losses
PGE/2200	Reply Testimony of Robert Macfarlane and Teresa Tang (Revised by Errata filing 12/17/21)
PGE/2201	Estimated Impact of Proposed Changes on Customers
PGE/2202	Marginal Cost Study Update
PGE/3000	Surrebuttal Testimony of Robert Macfarlane and Teresa Tang
PGE/3001	Estimated Impact of Proposed Changes on Customers
PGE/3002	Customer Marginal Cost Study Update
PGE/3003	Portland General Electric Facility Connection Requirements for Load
PGE/3004	Schedule 151 Wildfire Mitigation Cost Recovery

<b>Larry Bekkedahl, Senior VP of Advanced Energy Delivery for PGE, and Archie Ewers, Financial Planning and Analysis Manager for PGE – Capital Budgeting Controls and Process</b>	
PGE/1800	Reply Testimony of Larry Bekkedahl and Archie Ewers
PGE/1801	PGE’s Response to OPUC Data Request No. 889, Attachment B
PGE/1802	PGE’s Response to OPUC Data Request No. 880
PGE/1803	Example of Old PJF
PGE/1804	Example of New PJF
PGE/1805	Data Requests from Previous Rate Cases
<b>Larry Bekkedahl and Alex Tooman, Ph.D. – Level III Outage Mechanism</b>	
PGE/2400	Surrebuttal Testimony of Larry Bekkedahl and Alex Tooman, Ph.D.
PGE/2401	1995-2021 Event Costs
<b>John McFarland, VP and Chief Customer Officer for PGE, and Allison Rowden, Customer Service Manager for PGE – Fee Free Bank Card</b>	
PGE/500	*(Adopted) Direct Testimony of Larry Bekkedahl and John McFarland – Customer Service
PGE/1700	*(Adopted) Reply Testimony of Larry Bekkedahl and John McFarland – Customer Service
PGE/1701	*(Adopted) EEI – CEO Policy Committee on Customer Solutions Meeting
PGE/1702	*(Adopted) PGE’s Response to OPUC Data Request No. 746
PGE/1703	*(Adopted) TriMet and Electric Avenue Network Capital Costs
PGE/1704C	*(Adopted) CONFIDENTIAL PGE’s Response to OPUC Data Request No. 150, Attachment E
PGE/1705	*(Adopted) PGE’s Response to OPUC Data Request No. 932
PGE/1706	*(Adopted) PGE’s Response to UE 389 OPUC Data Request No. 33
PGE/2500	Surrebuttal Testimony of John McFarland and Allison Rowden
PGE/2501	PGE’s response to OPUC Data Request No. 939, Attachment A
PGE/2502	PGE’s response to OPUC Data Request No. 938, Attachment A
PGE/2503C	CONFIDENTIAL PGE’s response to OPUC Data Request No. 941, Attachment A
PGE/2504	PGE’s Customer Comments and Satisfaction Rating
PGE/2505C	CONFIDENTIAL PGE’s FFBC Email to Staff
PGE/2506HC	HIGHLY CONFIDENTIAL PGE’s response to OPUC Data Request No. 852, Attachment A
PGE/2507C	CONFIDENTIAL PGE’s response to OPUC Data Request No. 852, Attachment B
PGE/2508HC	HIGHLY CONFIDENTIAL Customer Service Business Group Presentation
<b>Larry Bekkedahl and Jay Tinker, Director of Rates and Regulatory Affairs at PGE – Faraday Repowering</b>	
PGE/700	*(Adopted) Direct Testimony of Bradley Jenkins, VP of Utility Operations for PGE and Stefan Cristea, VP of Utility Operations for PGE – Production

PGE/701C	*(Adopted) CONFIDENTIAL PGE Generating Resource Summary
PGE/702C	*(Adopted) CONFIDENTIAL PGE Thermal Plant Availability 2017-2020
PGE/703C	*(Adopted) CONFIDENTIAL PGE Actual and Forecasted Thermal Generation
PGE/704	*(Adopted) PGE Thermal Plant Major Maintenance Accruals
PGE/1900	*(Adopted) Reply Testimony of Larry Bekkedahl and Stefan Cristea – Production <sup>1</sup>
PGE/1901C	*(Adopted) CONFIDENTIAL Faraday Repowering Project Net Present Value Analysis
PGE/1902C	*(Adopted) CONFIDENTIAL 2020 Wildfire Impact at the Faraday Construction Site
PGE/1903C	*(Adopted) CONFIDENTIAL January 2020 Faraday Construction Site Flooding
PGE/1904C	*(Adopted) CONFIDENTIAL December 2020 Faraday Construction Site Flooding
PGE/1905C	*(Adopted) CONFIDENTIAL January 2021 Faraday Construction Site Flooding
PGE/2600	Surrebuttal Testimony of Larry Bekkedahl and Jay Tinker
<b>Ryan Van Oostrum, Manager of Financial Reporting and Research and Asset Accounting at PGE, and Stefan Cristea – Trojan Nuclear Decommissioning Trust</b>	
PGE/1900	*(Adopted) Reply Testimony of Larry Bekkedahl and Stefan Cristea – Production
PGE/1901C	*(Adopted) CONFIDENTIAL Faraday Repowering Project Net Present Value Analysis
PGE/1902C	*(Adopted) CONFIDENTIAL 2020 Wildfire Impact at the Faraday Construction Site
PGE/1903C	*(Adopted) CONFIDENTIAL January 2020 Faraday Construction Site Flooding
PGE/1904C	*(Adopted) CONFIDENTIAL December 2020 Faraday Construction Site Flooding
PGE/1905C	*(Adopted) CONFIDENTIAL January 2021 Faraday Construction Site Flooding
PGE/2700	Surrebuttal Testimony of Ryan Van Oostrum and Stefan Cristea
PGE/2701	PGE response to AWEC Data Request No. 288
PGE/2702C	CONFIDENTIAL Trojan NDT Model
PGE/2703	OPUC Staff’s Response to PGE Data Request No. 003
PGE/2704	Schedule 143 Balancing Account Activity 2019-2021

<sup>1</sup> Exhibits PGE/1900-1905C addressed both Faraday Repowering and Trojan Nuclear Decommissioning Trust. These exhibits were adopted by two different panels, Messrs. Bekkedahl and Tinker adopted those portions of the exhibits related to Faraday Repowering and Messrs. Van Oostrum and Cristea adopted those portions related to the Trojan Nuclear Decommissioning Trust.

<b>Larry Bekkedahl, Jay Tinker, and Brooke Brownlee, State Legislative Affairs Manager at PGE – Wildfire Mitigation and Vegetation Management</b>	
PGE/800	*(Adopted) Direct Testimony of Larry Bekkedahl and Bradley Jenkins
PGE/801	*(Adopted) Description of T&D Capital Projects
PGE/802	*(Adopted) Seismic Evaluation Report
PGE/803	*(Adopted) IOC Contractor Functions
PGE/804	*(Adopted) IOC Critical Function Criteria
PGE/805	*(Adopted) IOC Selection Criteria
PGE/806	*(Adopted) Natural Resources IOC Site Evaluations
PGE/807	*(Adopted) IOC Site Selection Scoring Activities
PGE/808	*(Adopted) ADMS Functionalities and Conceptual View
PGE/809	*(Adopted) ADMS Budgets by Size of Utility
PGE/810	*(Adopted) Wildfire Mitigation Plan
PGE/811	*(Adopted) Vegetation Management Trim Violations by Trim Cycles
PGE/812	*(Adopted) Vegetation Management Crew Count
PGE/813	*(Adopted) Vegetation Management Tree Related Outages
PGE/814	*(Adopted) Milwaukie City Ordinance No. 2197
PGE/815	*(Adopted) Portland Urban Forestry Programmatic Permit Portland General Electric
PGE/816	*(Adopted) Level III Accrual
PGE/2000	*(Adopted) Reply Testimony of Larry Bekkedahl and Bradley Jenkins
PGE/2001C	*(Adopted) CONFIDENTIAL ADMS Logical Architecture
PGE/2002C	*(Adopted) CONFIDENTIAL ADMS Training Strategy
PGE/2003	*(Adopted) Summary of Discovery Provided by PGE Regarding Projects Identified in Staff’s Opening Testimony
PGE/2004	*(Adopted) PGE’s Responses to Data Requests
PGE/2005C	*(Adopted) CONFIDENTIAL PGE’s Responses to Data Requests, Including Certain Whitepapers
PGE/2006HC	*(Adopted) HIGHLY CONFIDENTIAL PGE’s Responses to Data Requests, Including Certain Whitepapers
PGE/2007C	*(Adopted) CONFIDENTIAL Project Justification Forms
PGE/2008C	*(Adopted) CONFIDENTIAL Complete PJF for P35679 - Construct Marquam Project
PGE/2009C	*(Adopted) CONFIDENTIAL Wage Comparison for IBEW Local 125
PGE/2800	Surrebuttal Testimony of Larry Bekkedahl, Jay Tinker, and Brooke Brownlee
PGE/2801	2022 Wildfire Mitigation Plan
PGE/2802	May 26, 2021, OPUC Staff Memo “AR 638 Workgroup Launch Announcement”
PGE/2803	August 19, 2021, OPUC Staff Memo “AR 638 Staff’s Proposed Revised Scope”
PGE/2804	OPUC Staff Response to PGE Data Request No. 04



PGE/2805	OPUC Staff Response to PGE Data Request No. 07
PGE/2806	OPUC Report No. E20-49R, Portland General Electric (PGE)- Vegetation
PGE/2807	OPUC Report No. E21-53R, Portland General Electric (PGE)- Vegetation
PGE/2808	Comparison of PGE's Service Area and PacifiCorp's Oregon Service Area
PGE/2809	OPUC Staff Response to PGE Data Request No. 13
PGE/2810	OPUC Staff Response to PGE Data Request No. 16
<b>Alex Tooman, Ph.D. and Jaki Ferchland – Deferrals</b>	
PGE/2300	*(Adopted) Reply Testimony of Alex Tooman, Ph.D., and Greg Batzler – Deferrals
PGE/2900	Surrebuttal Testimony of Alex Tooman, Ph.D., and Jaki Ferchland
<b>Joint Testimony Co-Sponsored by Jaki Ferchland of PGE</b>	
Stipulating Parties/100	Joint Testimony of Stipulating Parties in Support of First Partial Stipulation (Muldoon-Gehrke-Mullins-Bieber-Chriss-Ferchland)
Stipulating Parties/101	First Partial Stipulation (9/30/21)
Stipulating Parties/102	Muldoon Witness Qualification Statement
Stipulating Parties/200	Joint Testimony of Stipulating Parties in Support of Second Partial Stipulation (Muldoon-Gehrke-Mullins-Bieber-Chriss-Ferchland)
Stipulating Parties/201	Second Partial Stipulation (12/2/21)
Stipulating Parties/202	Updated Revenue Requirement
Stipulating Parties/203	Ocat Forecast Calculation
Stipulating Parties/300	Joint Testimony of Stipulating Parties in Support of Third Partial Stipulation (Muldoon-Gehrke-Mullins-Bieber-Chriss-Steele-Ferchland)
Stipulating Parties/301	Third Partial Stipulation (1/13/22)
Stipulating Parties/302	Updated Revenue Requirement
Stipulating Parties/303	Updated Unbundling
Stipulating Parties/400	Fourth Partial Stipulation (2/7/22)

DATED: February 7, 2022

**MCDOWELL RACKNER GIBSON PC**



---

Katherine A. McDowell

Lisa Hardie

Jordan R. Schoonover  
419 SW 11<sup>th</sup> Avenue, Suite 400  
Portland, Oregon 97205  
Telephone: (503) 595-3924  
Email: dockets@mrg-law.com

**PORTLAND GENERAL ELECTRIC  
COMPANY**

Loretta Mabinton  
Managing Assistant General Counsel  
121 SW Salmon Street, 1WTC1301  
Portland, Oregon 97204  
Telephone: (503) 464-7822  
Email: loretta.mabinton@pgn.com

Attorneys for Portland General Electric  
Company