

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

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|---|---|---|
| In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, |) | UM 1953 - Phase II |
| |) | |
| |) | CALPINE ENERGY SOLUTIONS, LLC'S REVISED |
| Investigation Into Proposed Green Tariff |) | CROSS-EXAMINATION STATEMENT |

In accordance with the Administrative Law Judge (“ALJ”) Allan Arlow’s Memorandum and Ruling dated September 25, 2020 (“ALJ Ruling”), Calpine Energy Solutions, LLC (“Calpine Solutions”) hereby submits its Revised Cross-Examination Statement to the Public Utility Commission of Oregon (“OPUC” or “Commission”).

CROSS-EXAMINATION STATEMENT

Based on the record and discovery at this time, Calpine Solutions intends to cross examine the following panel of witnesses:

| | |
|-------------------|--|
| Witness(es): | Karla Wenzel, Josh Halley, and Brian Faist |
| Party: | Portland General Electric Company (“PGE”) |
| Anticipated time: | 30 minutes |

As noted in previous filings, PGE, the Northwest and Intermountain Power Producers Coalition (NIPPC”), and Calpine Solutions have agreed to use of this three-witness panel for purposes of the hearing even though the various rounds of PGE’s pre-filed testimony was submitted through different two-witness panels.

In response to the ALJ Ruling’s request to identify page numbers of pre-filed testimony upon which cross-examination will likely be based, Calpine Solutions provides the following table:

| Testimony's Exhibit Number | Anticipated Pages |
|-----------------------------------|---------------------------|
| PGE/500 | Pages 11, 21-29 |
| PGE/600 | Pages 14-24, 27-31 |
| PGE/700 | Pages 16-17 |
| PGE/800 | Pages 13-27, 32-35, 45-47 |

Calpine Solutions also reserves the right to ask follow-up questions of any witness who is cross-examined by another party, the Administrative Law Judge, or the Commissioners.

Additionally, Calpine Solutions respectfully requests that its cross examination follow that of NIPPC's cross examination. In light of the overlap of potential cross examination, NIPPC and Calpine Solutions have coordinated in a manner to attempt to avoid repetition, with the intent of NIPPC proceeding first and Calpine Solutions to follow.

CROSS-EXAMINATION EXHIBITS

Calpine Solutions may use or move for admission of the following exhibits at the hearing, copies of which are attached to the initial Cross Examination Statement and Hearing Exhibits filed by Calpine Solutions on September 22, 2020:

| Testimony/Exhibit | Description |
|--------------------------|---|
| Calpine Solutions/200 | PGE's Response to Calpine Solutions' Data Request No. 007 |
| Calpine Solutions/201 | PGE's Response to Calpine Solutions' Data Request No. 008 |
| Calpine Solutions/202 | PGE's Response to NIPPC's Data Request No. 007 |
| Calpine Solutions/203 | PGE's Response to NIPPC's Data Request No. 002 |

Additionally, Calpine Solutions may ask questions based upon the confidential exhibits submitted by the NIPPC, which are labeled NIPPC/410 and NIPPC/418 in NIPPC's cross examination filings. Counsel for PGE, NIPPC, and Calpine Solutions agreed to limit the number of parties filing such confidential materials by allowing other parties to rely on the pre-filed confidential exhibits filed by another party. Thus, Calpine Solutions did not independently include these exhibits among its cross-examination exhibits filed on September 22, 2020, but may conduct cross examination referring to these confidential exhibits offered by NIPPC.

DATED: October 2, 2020.

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