

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

3                                   UE 179

4   In the Matter of

5   PACIFICORP, dba PACIFIC POWER &  
6   LIGHT COMPANY

7   Request for a General Rate Increase in the  
8   Company's Oregon Annual Revenues

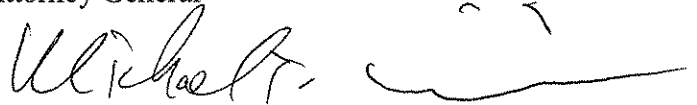
STAFF'S MOTION TO ADMIT TESTIMONY  
AND EXHIBITS

9           COMES NOW, staff of the Public Utility Commission of Oregon (staff) and asks the  
10   Commission to admit its pre-filed testimony and exhibits sponsored by its witnesses Steve  
11   Chriss, Bryan Conway, Michael Dougherty, Ed Durrenberger, J.R. Gonzalez, Judy Johnson,  
12   Lynn Kittilson, Thomas Morgan, Paul Rossow and Bill Wordley. This motion is supported by  
13   the attached affidavits of each staff witness.

14           DATED this 7<sup>th</sup> day of September, 2006.

15  
16                                   Respectfully submitted,

17                                   HARDY MYERS  
18                                   Attorney General

19                                   

20                                   Michael T. Weirich, #82425  
21                                   Assistant Attorney General  
22                                   Of Attorneys for Staff of the Public Utility  
23                                   Commission of Oregon  
24  
25  
26

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UE 179**

4 In the Matter of

5 PACIFICORP, dba PACIFIC POWER &  
6 LIGHT COMPANY

7 Request for a General Rate Increase in the  
8 Company's Oregon Annual Revenues

AFFIDAVIT OF STEVE CHRISS

9 I, Steve Chriss, being duly sworn on oath, depose and say:

10 1. I am a Senior Utility Analyst with the Public Utility Commission of Oregon.

11 2. I sponsored direct testimony and exhibits and reply testimony and exhibits in the  
12 above-captioned docket as follows: Staff/900, 901, 902, 903, 904, 905 and 906.

13 3. My pre-filed testimony is true and accurate based on my information and belief. If I  
14 were asked the same questions today, my answers would be the same.

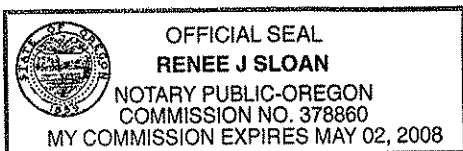
15   
16 STEVE CHRISS

17 SUBSCRIBED AND SWORN to before me this 31 day of August, 2006.

18 *STATE of Oregon*  
19 *County of Marion*

20 *Renee J Sloan*  
Notary Public for Oregon

21 My Commission Expires: May 2, 2006



1                               **BEFORE THE PUBLIC UTILITY COMMISSION**  
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AFFIDAVIT OF BRYAN CONWAY

9           I, Bryan Conway, being duly sworn on oath depose and say:

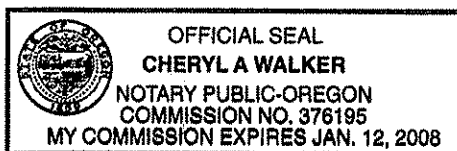
10           1. I am a Manager of the Economic and Policy Analysis Section in the Economic  
11   Research and Financial Analysis Division of the Public Utility Commission of Oregon.

12           2. I am the same Bryan Conway that previously filed testimony on behalf of Staff in this  
13   matter. (See Staff/700, 701, and 702).

14           3. My pre-filed testimony and exhibits are true and accurate based on my information  
15   and belief.

16   Bryan Conway  
17   Bryan Conway

18   SUBSCRIBED AND SWORN to before me this 6<sup>th</sup> day of September, 2006.



Cheryl A Walker  
Notary Public for Oregon  
My Commission Expires: Jan. 12, 2008

1                               **BEFORE THE PUBLIC UTILITY COMMISSION**  
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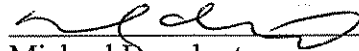
AFFIDAVIT OF MICHAEL DOUGHERTY

9           I, Michael Dougherty, being duly sworn on oath depose and say:

10          1. I am Program Manager in Corporate Analysis and Water Regulation in the Economic  
11   Research and Financial Analysis Section of the Public Utility Commission of Oregon.

12          2. I filed testimony on behalf of Staff in this matter. (See Staff/600, 601, 602, 603, 604,  
13   and 605).

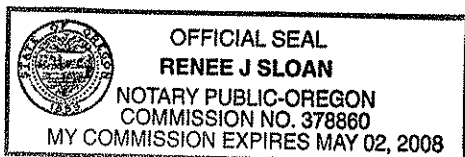
14          3. My pre-filed testimony and exhibits are true and accurate based on my information  
15   and belief.

16     
17   Michael Dougherty

18   SUBSCRIBED AND SWORN to before me this 5<sup>th</sup> day of September, 2006.

19           *State of Oregon*  
20           *County of Marion*

21     
22   Notary Public for Oregon  
23   My Commission Expires: *May 2, 2008*



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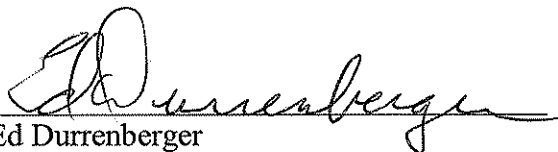
AFFIDAVIT OF ED DURRENBERGER

9           I, Ed Durrenberger, being duly sworn on oath depose and say:

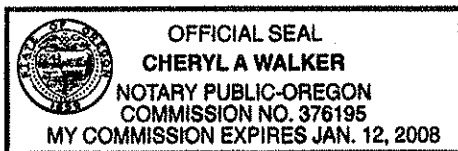
10           1. I am the Senior Revenue Requirements Analyst for Electric & Natural Gas Revenue  
11   Requirements in the Utility Program of the Public Utility Commission of Oregon.

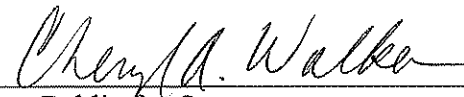
12           2. I filed testimony on behalf of Staff in this matter. (See Staff/200, 202, and 203, and  
13   Joint Parties/100).

14           3. My pre-filed testimony and exhibits are true and accurate based on my information  
15   and belief.

16     
17   Ed Durrenberger

18   SUBSCRIBED AND SWORN to before me this 5<sup>th</sup> day of September, 2006.



  
Notary Public for Oregon  
My Commission Expires: 1-12-08

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

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JOINT AFFIDAVIT OF J.R. GONZALEZ and ED  
DURRENBERGER

9           I, J.R. Gonzalez and I, Ed Durrenberger, being duly sworn on oath depose and say:

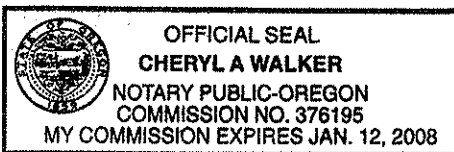
10          1. We are employed by the Public Utility Commission of Oregon.

11          2. We filed joint testimony on behalf of Staff in this matter. (See Staff/1000, 1001, and  
12   1002).

13          3. Our pre-filed testimony and exhibits are true and accurate based on our information  
14   and belief.

15  
16   J.R. Gonzalez

17   SUBSCRIBED AND SWORN to before me this 31<sup>st</sup> day of August, 2006.

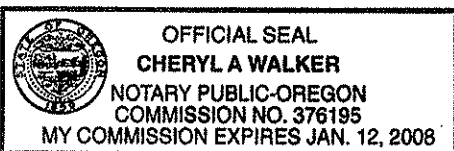


21   Cheryl A. Walker  
22   Notary Public for Oregon

My Commission Expires: Jan. 12, 2008

23   Ed Durrenberger

24   SUBSCRIBED AND SWORN to before me this 31<sup>st</sup> day of August, 2006.



27   Cheryl A. Walker  
28   Notary Public for Oregon

My Commission Expires: Jan. 12, 2008

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AFFIDAVIT OF JUDY JOHNSON

9            I, Judy Johnson, being duly sworn on oath depose and say:

10           1. I am Program Manager of the Electricity and Natural Gas Division of the Utility  
11    Division of the Public Utility Commission of Oregon.

12           2. I am the same Judy Johnson that previously filed testimony on behalf of Staff in this  
13    matter. (See Staff/300, 301, and 302).

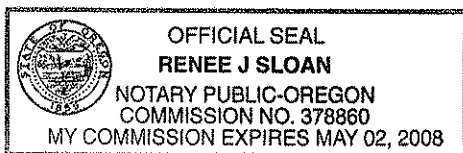
14           3. My pre-filed testimony and exhibits are true and accurate based on my information  
15    and belief.

16    Judy Johnson  
17    Judy Johnson

18    SUBSCRIBED AND SWORN to before me this 31 day of August, 2006.

19                                *State of Oregon*  
20                                *County of Marion*

21    Renee J Sloan  
22    Notary Public for Oregon  
23    My Commission Expires: *May 2, 2008*



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AFFIDAVIT OF LYNN KITTILSON

9           I, Lynn Kittilson, being duly sworn on oath depose and say:

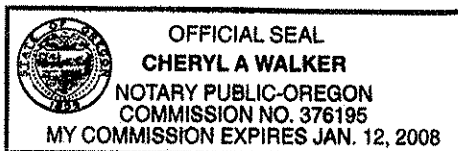
10           1. I am a Senior Utility Analyst in the Electricity and Natural Gas Division of the Utility  
11   Division of the Public Utility Commission of Oregon.

12           2. I filed testimony on behalf of Staff in this matter. (See Staff/500, 501, 502 and 503).

13           3. My pre-filed testimony and exhibits are true and accurate based on my information  
14   and belief.

15   Lynn Kittilson  
16   Lynn Kittilson

17   SUBSCRIBED AND SWORN to before me this 31<sup>st</sup> day of August, 2006.



Cheryl A. Walker  
Notary Public for Oregon  
My Commission Expires: Jan. 12, 2008





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AFFIDAVIT OF PAUL ROSSOW

9            I, Paul Rossow, being duly sworn on oath depose and say:

10           1. I am a Utility Analyst in the Electricity and Natural Gas Division of the Utility  
11    Division of the Public Utility Commission of Oregon.

12           2. I filed testimony on behalf of Staff in this matter. (See Staff/400, 401, and 402).

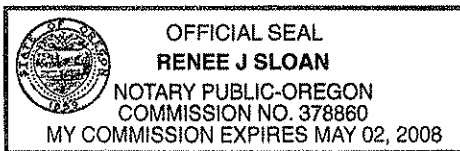
13           3. My pre-filed testimony and exhibits are true and accurate based on my information  
14    and belief.

15    Paul Rossow  
16    Paul Rossow

17    SUBSCRIBED AND SWORN to before me this 31 day of August, 2006.

18                        *State of Oregon*  
19                        *County of Marion*

20    Renee J Sloan  
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AFFIDAVIT OF BILL WORDLEY

9           I, Bill Wordley, being duly sworn on oath depose and say:

10           1. I am a Senior Economist in the Economic Research and Financial Analysis Division  
11   of the Public Utility Commission of Oregon.

12           2. I am the same Bill Wordley that previously filed testimony on behalf of Staff in this  
13   matter. (See Staff/100, 101, and 102).

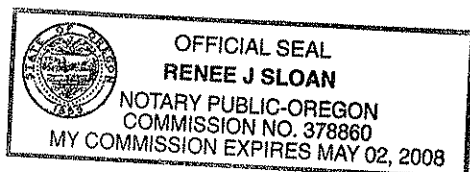
14           3. My pre-filed testimony and exhibits are true and accurate based on my information  
15   and belief.

16   Bill Wordley  
17   Bill Wordley

18   SUBSCRIBED AND SWORN to before me this 31 day of August, 2006.

19           State of Oregon  
20           County of Marion

21   Renee J Sloan  
22   Notary Public for Oregon  
23   My Commission Expires: May 2, 2008



1 **CERTIFICATE OF SERVICE**

2 I certify that on September 7, 2006, I served the foregoing upon all parties of record in  
3 this proceeding by delivering a copy by electronic mail and by mailing a copy by postage prepaid  
4 first class mail or by hand delivery/shuttle mail to the parties accepting paper service.

5 **JIM DEASON - CONFIDENTIAL**  
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8 PORTLAND OR 97201-5407  
9 jimdeason@comcast.net

10 **BOEHM KURTZ & LOWRY**  
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12 ATTORNEY  
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14 CINCINNATI OH 45202  
15 kboehm@bklawfirm.com

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19 CINCINNATI OH 45202-4454  
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**W**  
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**ATTORNEY**

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**W**  
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**PORTLAND GENERAL ELECTRIC**

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Department of Justice  
Regulated Utility & Business Section