

JOHN R. KROGER
Attorney General



MARY H. WILLIAMS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

October 6, 2011

Attention: Filing Center
Public Utility Commission of Oregon
550 Capitol Street NE, #215
PO Box 2148
Salem, OR 97308-2148
puc.filingcenter@state.or.us

Re: *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY 2012 Annual Power
Cost Update Tariff*
PUC Docket No.: UE 228
DOJ File No.: 860115-GB0313-11

Enclosed are an original and one copy of Motion to Submit Staff Testimony in the above-captioned matter for filing with the PUC for today. Included with this motion is a copy of the affidavit of staff witness Steve Schue. Staff will file the original affidavit no later than tomorrow, October 7, 2011.

Sincerely,

Stephanie S. Andrus
Senior Assistant Attorney General
Business Activities Section

SSA:mme/#3030552
c: UE 228 Service List

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 228**

In the Matter of
PORTLAND GENERAL ELECTRIC
COMPANY
2012 Annual Power Cost Update Tariff
(Schedule 125)

MOTION TO SUBMIT STAFF TESTIMONY

Staff of the Public Utility Commission of Oregon (“staff”) asks the administrative law judge (“ALJ”) to admit into the record the filing exhibits:

Staff 100—Testimony of Ed Durrenberger (adopted by Steve Schue)

Staff 101—Witness Qualification Statement of Ed Durrenberger

Staff 100 is supported by the affidavit of Steve Schue attesting to the truthfulness of Mr. Durrenberger’s testimony. Mr. Schue’s own witness qualification statement is attached to the affidavit.

It is not clear that Mr. Durrenberger’s witness qualification statement is still pertinent given that Mr. Schue has adopted his testimony. In any event, staff asks for its admission to ensure the record is complete.

DATED this 6th day of October 2011.

Respectfully submitted,

JOHN R. KROGER
Attorney General



Stephanie S. Andrus, #925123
Senior Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of October, 2011, I served the foregoing Motion to Submit Staff Testimony upon the persons named on the service list, by mailing a full, true and correct copy thereof and to such persons waiving such service by mail who were served at their e-mail address as listed on the service list.

W Gregory M. Adams (Confidential) Richardson & O'Leary greg@richardsonandoleary.com	W Greg Bass Noble Americas Energy Solutions, LLC gbass@noblesolutions.com	W Randy Dahlgren (Confidential) PGE pge.opuc.filing@pgn.com
W Ed Durrenberger (Confidential) OPUC ed.durrenberger@state.or.us	W Gordon Feighner (Confidential) CUB gordon@oregoncub.org	W Kevin Higgins (Confidential) Energy Strategies LLC khiggins@energystrat.com
W Robert Jenks (Confidential) CUB bob@oregoncub.org	W G. Catriona McCracken (Confidential) CUB catriona@oregoncub.org	W Irion A. Sanger (Confidential) Davison Van Cleve PC mail@dvclaw.com ; bvc@dvclaw.com
W Donald W. Schoenbeck (Confidential) Regulatory & Cogeneration Services Inc. dws@r-c-s-inc.com	W Douglas C. Tingey (Confidential) PGE doug.tingey@pgn.com	W S. Bradley Van Cleve (Confidential) Davison Van Cleve PC mail@dvclaw.com ; bvc@dvclaw.com

DATED: October 6, 2011


Stephanie Andrus, OSB #925123
Senior Assistant Attorney General