

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

3 UE 246

4 In the Matter of

5 PACIFICORP, dba PACIFIC POWER's
6 Request for a General Rate Revision

STAFF MOTION TO ADMIT PRE-FILED
TESTIMONY AND SUPPORTING
AFFIDAVITS

8 Staff of the Public Utility Commission (Staff) requests that the Administrative Law Judge
9 admit Staff's pre-filed testimony and exhibits in this docket. These exhibits are as follows:
10 Staff/100-103, 200-203, 300-303, 400-404, 600-604, 700-704, 800-803, 900-905, 1000-1001,
11 1100-1107, 1200-1204, 1500-1509, and Exhibit Stipulating Parties/100. The affidavits of the
12 following Staff sponsoring witnesses are attached to this motion: Deborah Garcia, Steven T.
13 Storm, Matt Muldoon, Erik Colville, Paul Rossow, Nicholas Cimmiyotti, Linnea Wittekind, Judy
14 Johnson, Jorge Ordonez, and George R. Compton. The testimony and exhibits sponsored by
15 Staff witness Steve Schue are not included by this motion because Mr. Schue's exhibits will be
16 offered when he testifies the evidentiary hearing on October 15, 2012.

17 DATED this 12th day of October 2012.

18 Respectfully submitted,

19 ELLEN F. ROSENBLUM
20 Attorney General

21 

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

CERTIFICATE OF SERVICE

I certify that on October 12, 2012, I served the foregoing Staff Motion upon all parties of record in this proceeding by delivering a copy by electronic mail only as all parties waive paper service.

W

WILLIAM GANONG (C)
514 WALNUT AVENUE
KLAMATH FALLS OR 97601
wganong@aol.com

W

BOEHM KURTZ & LOWRY
KURT J BOEHM (C)
ATTORNEY
36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

W

BOEHM, KURTZ & LOWRY
JODY KYLER (C)
ATTORNEY
36 E SEVENTH ST STE 1510
CINCINNATI OH 45202
jkyler@bkllawfirm.com

W

CITIZENS' UTILITY BOARD OF OREGON
OPUC DOCKETS
610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

ROBERT JENKS (C)
610 SW BROADWAY, STE 400
PORTLAND OR 97205
bob@oregoncub.org

G. CATRIONA MCCracken (C)
610 SW BROADWAY, STE 400
PORTLAND OR 97205
catriona@oregoncub.org

W

DAVISON VAN CLEVE
IRION A SANGER (C)
333 SW TAYLOR - STE 400
PORTLAND OR 97204
ias@dvclaw.com

W

DAVISON VAN CLEVE PC
MELINDA J DAVISON (C)
333 SW TAYLOR - STE 400
PORTLAND OR 97204
mjd@dvclaw.com; mail@dvclaw.com

W

ENERGY STRATEGIES LLC
KEVIN HIGGINS (C)
215 STATE ST - STE 200
SALT LAKE CITY UT 84111-2322
khiggins@energystat.com

W

ESLER STEPHENS & BUCKLEY
JOHN W STEPHENS (C)
888 SW FIFTH AVE STE 700
PORTLAND OR 97204-2021
stephens@eslerstephens.com;
mec@eslerstephens.com

W

KLAMATH WATER AND POWER AGENCY
HOLLIE CANNON (C)
735 COMMERCIAL ST STE 4000
KLAMATH FALLS OR 97601
hollie.cannon@kwapa.org

W

NW ENERGY COALITION
WENDY GERLITZ (C)
1205 SE FLAVEL
PORTLAND OR 97202
wendy@nwenergy.org

W

PACIFIC POWER
R. BRYCE DALLEY (C)
825 NE MULTNOMAH ST., STE 2000
PORTLAND OR 97232
bryce.dalley@pacificorp.com

SARAH WALLACE (C)
825 NE MULTNOMAH ST STE 1800
PORTLAND OR 97232
sarah.wallace@pacificorp.com

W

PACIFICORP, DBA PACIFIC POWER
OREGON DOCKETS
825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

1 **W**
2 **PARKS LAW OFFICES, LLC**
3 KEVIN E PARKS
310 SW 4TH AVE., STE. 806
PORTLAND OR 97204
kevin@parks-law-offices.com

4 **W**
5 **PORTLAND GENERAL ELECTRIC**
6 RANDY DAHLGREN
121 SW SALMON ST - 1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

7 DOUGLAS C TINGEY
121 SW SALMON 1WTC13
8 PORTLAND OR 97204
doug.tingey@pgn.com

9 **W**
10 **PUBLIC UTILITY COMMISSION OF OREGON**
11 DEBORAH GARCIA (C)
PO BOX 2148
SALEM OR 97308-2148
deborah.garcia@state.or.us

12 **W**
13 **REGULATORY & COGENERATION SERVICES**
14 **INC**
DONALD W SCHOENBECK (C)
900 WASHINGTON ST STE 780
VANCOUVER WA 98660-3455
15 dws@r-c-s-inc.com

W
RENEWABLE NORTHWEST PROJECT
MEGAN WALSETH DECKER (C)
421 SW 6TH AVE #1125
PORTLAND OR 97204-1629
megan@rnp.org

JIMMY LINDSAY (C)
421 SW 6TH AVE #1125
PORTLAND OR 97204-1629
jimmy@rnp.org

W
ROBERTSON-BRYAN, INC.
STUART ROBERTSON
9888 KENT STREET
ELK GROVE CA 95624
stuart@robertson-bryan.com

W
SIERRA CLUB LAW PROGRAM
DEREK NELSON (C)
85 SECOND STREET, 2ND FL
SAN FRANCISCO CA 94105
derek.nelson@sierraclub.org

GLORIA D SMITH (C)
85 SECOND STREET
SAN FRANCISCO CA 94105
gloria.smith@sierraclub.org

W
SYNAPSE ENERGY
JEREMY FISHER (C)
485 MASSACHUSETTS AVE., STE 2
CAMBRIDGE MA 02139
jfisher@synapse-energy.com



Neoma Lane
Legal Secretary
Department of Justice
Business Activities Section

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF DEBORAH GARCIA


STATE OF OREGON)

County of Marion)

I, Deborah Garcia, being duly sworn on oath depose and say:

1. My name is Deborah Garcia. I am employed by the Public Utility Commission of Oregon as a Senior Revenue Requirements Analyst.
2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff 100 – 103. I also co-sponsored Exhibit Stipulating Parties/100.
3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.


Dated this 10th day of October, 2012.



Deborah Garcia

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.





Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF DEBORAH GARCIA

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF STEVEN T. STORM

STATE OF OREGON)

County of Marion)

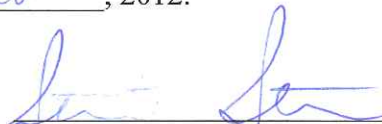
I, Steven T. Storm, being duly sworn on oath depose and say:

1. My name is Steven T. Storm. I am employed by the Public Utility Commission of Oregon as Program Manager, Economic and Policy Analysis.

2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/200 – 203.

3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.


Dated this 10th day of October, 2012.



Steven T. Storm

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.





Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF STEVEN T. STORM

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF MATT MULDOON

STATE OF OREGON)

County of Marion)

I, Matt Muldoon, being duly sworn on oath depose and say:

1. My name is Matt Muldoon. I am employed by the Public Utility Commission of Oregon as a Senior Economist.

2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/300 – 303.

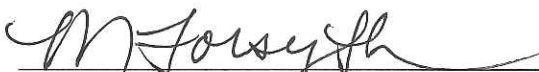
3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

Dated this 10 day of October, 2012.


Matt Muldoon

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.




Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF MATT MULDOON

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF ERIK COLVILLE

STATE OF OREGON)

County of Marion)

I, Erik Colville, being duly sworn on oath depose and say:

1. My name is Erik Colville. I am employed by the Public Utility Commission of Oregon as a Utility Analyst 3.

2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/400 – 404; and Staff/1500-1509.

3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

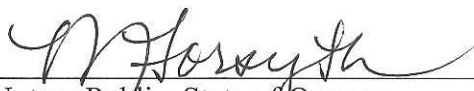
Dated this 10 day of October, 2012.



Erik Colville

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.





Notary Public, State of Oregon
County of marion
My Commission Expires: 7-20-15

AFFIDAVIT OF ERIK COLVILLE

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF PAUL ROSSOW

STATE OF OREGON)

County of Marion)

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

1. My name is Paul Rossow. I am employed by the Public Utility Commission of Oregon as an Utility Analyst.

2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/600 – 604.

3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

Dated this 10 day of October, 2012.

Paul Rossow
Paul Rossow

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.

M. Forsyth
Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15



AFFIDAVIT OF PAUL ROSSOW

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF NICHOLAS CIMMIYOTTI

STATE OF OREGON)

County of Marion)

I, Nicholas Cimmiyotti, being duly sworn on oath depose and say:

1. My name is Nicholas Cimmiyotti. I am employed by the Public Utility Commission of Oregon as a Senior Financial Analyst.

2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/700 – 704.

3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.


Dated this 10th day of October, 2012.



Nicholas Cimmiyotti

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.





Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF NICHOLAS CIMMIYOTTI

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF LINNEA WITTEKIND

STATE OF OREGON)

County of Marion)

I, Linnea Wittekind, being duly sworn on oath depose and say:


1. My name is Linnea Wittekind. I am employed by the Public Utility Commission of Oregon as a Senior Financial Analyst.
2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/800 – 803. I also co-sponsored Joint Staff/900-905 with Irina Phillips. Ms. Phillips is no longer employed by the Commission.
3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

Dated this 10 day of October, 2012.


Linnea Wittekind

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.




Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF LINNEA WITTEKIND

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF JUDY JOHNSON

STATE OF OREGON)

County of Marion)

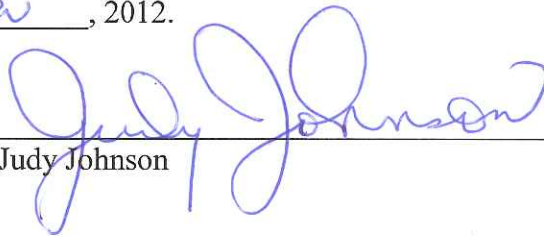
I, Judy Johnson, being duly sworn on oath depose and say:

1. My name is Judy Johnson. I am employed by the Public Utility Commission of Oregon as Manager, Revenue Requirements.

2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/1000 – 1001.

3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.


Dated this 10 day of October, 2012.



Judy Johnson

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.





Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF JUDY JOHNSON

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF JORGE ORDONEZ

STATE OF OREGON)

County of Marion)


I, Jorge Ordonez, being duly sworn on oath depose and say:

1. My name is Jorge Ordonez. I am employed by the Public Utility Commission of Oregon as a Senior Financial Economist.

2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/1100 – 1107.

3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

Dated this 11 day of October, 2012.



Jorge Ordonez

SUBSCRIBED AND SWORN to before me this 11 day of October, 2012.





Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF JORGE ORDONEZ

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER's
Request for a General Rate Revision

AFFIDAVIT OF GEORGE R. COMPTON

STATE OF OREGON)

County of Marion)

I, George R. Compton, being duly sworn on oath depose and say:

1. My name is George R. Compton. I am employed by the Public Utility Commission of Oregon as a Senior Economist.

2. I sponsored the following exhibits on behalf of Commission Staff in this matter: Staff/1200 – 1204.


3. My testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

Dated this 10th day of October, 2012.


George R. Compton

SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.




Notary Public, State of Oregon
County of Marion
My Commission Expires: 7-20-15

AFFIDAVIT OF GEORGE R. COMPTON