

ELLEN F. ROSENBLUM
Attorney General



MARY H. WILLIAMS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

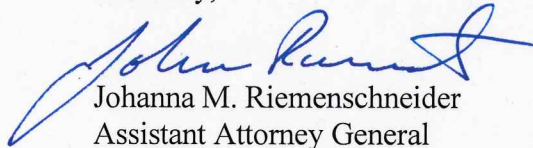
September 23, 2013

Attention: Filing Center
Public Utility Commission of Oregon
3930 Fairview Industrial Drive, SE
P.O. Box 1088
Salem, OR 97308-1088
puc.filingcenter@state.or.us

Re: *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for General
Rate Revision*
PUC Docket No.: UE 262
DOJ File No.: 860115-GB0183-13

Enclosed for filing with the Commission today are an original and one copy of STAFF
MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS with certificate of
service/service list.

Sincerely,



Johanna M. Riemenschneider
Assistant Attorney General
Business Activities Section

Enclosures
JMR:jrs/#4608648
(Electronic copy only)
c: UE 262 service list

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

3 UE 262

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY,

7 Request for a General Rate Revision.

STAFF MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS

8
9 Staff of the Public Utility Commission of Oregon (Staff) moves that the following pre-
10 filed testimony and exhibits listed below, as well as the attached supporting affidavits, be
11 admitted into the record in this proceeding:

12 Staff/100 and 101, sponsored by Linnea Wittekind.

13 Staff/200, 201, 500, and 501 sponsored by Brian Bahr.

14 Staff/300, 301, and 302, sponsored by George R. Compton.

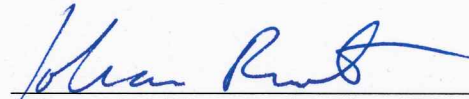
15 Staff/ 400, 401, 402, and 403, sponsored by Lance Kaufman.

16 The affidavits of witnesses Wittekind, Bahr, Compton and Kaufman attesting to the truth
17 and accuracy of their testimony and exhibits are attached.

18
19 DATED this 23 day of September 2013.

20 Respectfully submitted,

21 ELLEN F. ROSENBLUM
22 Attorney General

23 

24 Johanna M. Riemenschneider, #990083
25 Assistant Attorney General
26 Of Attorneys for Staff of the Public Utility
 Commission of Oregon

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 262

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY, Request for a General Rate
Revision

AFFIDAVIT OF LINNEA WITTEKIND

STATE OF OREGON)

County of Marion)

I, Linnea Wittekind, hereby depose and say:

1. I am a Senior Financial Analyst employed by the Public Utility Commission of Oregon.

2. I filed opening testimony on behalf of Staff in this matter. (See Staff/100, 101).

3. My pre-filed testimony and exhibit 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 3rd day of September 2013.


Linnea Wittekind

SUBSCRIBED AND SWORN to before me this 3rd day of September, 2013.




Notary Public, State of Oregon

County of marion

My Commission Expires: August 31, 2015

AFFIDAVIT OF LINNEA WITTEKIND

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 262

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY, Request for a General Rate
Revision

AFFIDAVIT OF BRIAN BAHR

STATE OF OREGON)

County of Marion)

I, Brian Bahr, being duly sworn on oath depose and say:

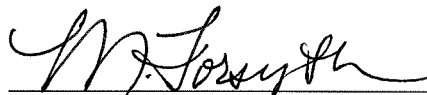
1. I am a Senior Utility Analyst in the Energy – Rates, Financial & Audit Section of the Public Utility Commission of Oregon.
2. I filed testimony on behalf of Staff in this matter. (See Staff/200, 201, 500, and 501).
3. My pre-filed testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

Dated this 28 day of August 2013.



Brian Bahr

SUBSCRIBED AND SWORN to before me this 28 day of August, 2013.



Notary Public, State of Oregon

County of Marion

My Commission Expires: 7-20-15

AFFIDAVIT OF BRIAN BAHR

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 262

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY, Request for a General Rate
Revision

AFFIDAVIT OF GEORGE R. COMPTON

STATE OF OREGON)

County of Marion)

I, George R. Compton, hereby depose and say:

1. I am a Senior Economist employed by the Public Utility Commission of Oregon.
2. I filed opening testimony on behalf of Staff in this matter. (See Staff/300, 301, 302).
3. My pre-filed 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 30 day of August 2013.

George R. Compton
George R. Compton

SUBSCRIBED AND SWORN to before me this 30 day of August, 2013.



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

AFFIDAVIT OF GEORGE R. COMPTON

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 262

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY, Request for a General Rate
Revision

AFFIDAVIT OF LANCE KAUFMAN

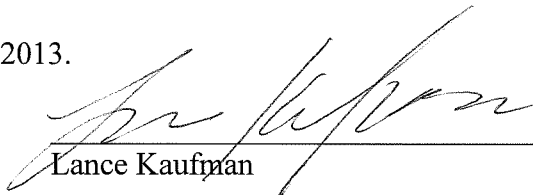
STATE OF OREGON)

County of Marion)

I, Lance Kaufman, hereby depose and say:

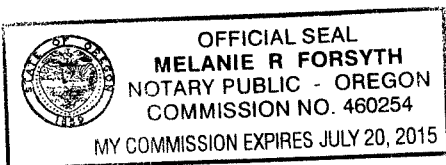
1. I am a Utility Economist employed by the Public Utility Commission of Oregon.
2. I filed opening testimony on behalf of Staff in this matter. (*See Staff/400, 401, 402, and 403*).
3. My pre-filed testimony and exhibits are true and accurate based on my information and belief. If I were to answer these questions today, my responses would be the same.

Dated this 18th day of September 2013.



Lance Kaufman

SUBSCRIBED AND SWORN to before me this 18th day of September 2013.





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

AFFIDAVIT OF LANCE KAUFMAN

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2013, I served the foregoing STAFF MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS upon the persons named on the service list below who have waived such service by mail, by serving a full, true and correct copy thereof at their e-mail addresses as follows:

OPUC Dockets
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97205
dockets@oregoncub.org

Oregon Dockets
Pacifcorp, dba Pacific Power
825 NE Multnomah St, Suite 2000
Portland OR 97232
oregondockets@pacifcorp.com

E-Filing
Northwest Natural
220 NW 2nd Avenue
Portland OR 97209
efiling@nwnatural.com

Gregory M. Adams (C)
Richardson Adams, PLLC
PO Box 7218
Boise ID 83702
greg@richardsonadams.com

Stephanie S. Andrus (C)
PUC Staff--Department of Justice
Business Activities Section
1162 Court St NE
Salem OR 97301-4096
stephanie.andrus@state.or.us

Andrew Bartlett (C)
City of Hillsboro
150 East Main Street
Hillsboro OR 97123
andrew.bartlett@hillsboro-oregon.gov

Greg Bass
Noble Americas Energy Solutions,
LLC
401 West A Street, Suite. 500
San Diego CA 92101
gbass@noblesolutions.com

Kurt J. Boehm (C)
Boehm Kurtz & Lowry
36 E Seventh Street - Suite 1510
Cincinnati OH 45202
kboehm@bkllawfirm.com

Tommy A. Brooks (C)
Cable Huston Benedict Haagensen
& Lloyd
1001 SW Fifth Ave, Suite 2000
Portland OR 97204-1136
tbrooks@cablehuston.com

Steve W. Chriss (C)
Wal-Mart Stores, Inc.
2001 Se 10th Street
Bentonville AR 72716-0550
stephen.chriss@wal-mart.com

R. Bryce Dalley
Pacific Power
825 NE Multnomah Street, Ste. 2000
Portland OR 97232
bryce.dalley@pacifcorp.com

Carl Fink
628 SW Chestnut Street, Suite 200
Portland OR 97219
cmfink@blueplanetlaw.com

Maja Haium (C)
League of Oregon Cities
PO Box 928
Salem OR 97308
mhaium@orcities.org

Kevin Higgins (C)
Energy Strategies LLC
215 State Street - Suite 200
Salt Lake City UT 84111-2322
khiggins@energystrat.com

Robert Jenks (C)
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97205
bob@oregoncub.org

Judy Johnson (C)
Public Utility Commission Of
Oregon
PO Box 2148
Salem OR 97308-2148
judy.johnson@state.or.us

Robert D. Kahn
NW & Intermountain Power Producers
Coalition
1117 Minor Avenue, Suite 300
Seattle WA 98101
rkahn@nippc.org

Jody Kyler Cohn (C)
Boehm, Kurtz & Lowry
36 E Seventh Street, Suite 1510
Cincinnati OH 45202
jkyler@bkllawfirm.com

G. Catriona McCracken (C)
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97205
catriona@oregoncub.org

Paula E. Pyron
Troutdale Energy Center
4113 Wolf Berry Ct
Lake Oswego OR 97035-1827
ppyron@cpkinder.com

Lisa F. Rackner
McDowell Rackner & Gibson PC
419 SW 11th Ave., Suite 400
Portland OR 97205
dockets@mcd-law.com

Johanna Riemenschneider (C)
PUC Staff - Department Of Justice
Business Activities Section
1162 Court Street NE
Salem OR 97301-4796
johanna.riemenschneider@doj.state.or.us

Samuel L. Roberts (C)
Hutchinson Cox Coons Orr & Sherlock
777 High Street Suite 200
PO Box 10886
Eugene OR 97440
sroberts@eugenelaw.com

Tracy Rutten (C)
League of Oregon Cities
PO Box 928
Salem OR 97308
trutten@orcities.org

Irion A. Signer (C)
Davison Van Cleve
333 SW Taylor – Suite 400
Portland OR 97204
ias@dvclaw.com

Donald W. Schoenbeck (C)
Regulatory & Cogeneration Services
Inc.
900 Washington Street, Suite 780
Vancouver WA 98660-3455
dws@r-c-s-inc.com

Nona Soltero
Fred Meyer Stores/Kroger
3800 SE 22nd Avenue
Portland OR 97202
nona.soltero@fredmeyer.com

Chad M. Stokes (C)
Cable Huston Benedict Haagensen &
Lloyd LLP
1001 SW 5th - Suite 2000
Portland OR 97204-1136
cstokes@cablehuston.com

Mark R. Thompson
Northwest Natural
220 NW 2nd Ave
Portland OR 97209
mark.thompson@nwnatural.com

Douglas C. Tingey (C)
Portland General Electric
121 SW Salmon Street - 1WTC13
Portland OR 97204
doug.tingey@pgn.com

Jay Tinker (C)
Portland General Electric
121 SW Salmon Street - 1WTC-0702
Portland OR 97204
pge.opuc.filings@pgn.com

David Tooze
City of Portland - Planning &
Sustainability
1900 SW 4th Suite 7100
Portland OR 97201
david.tooze@portlandoregon.gov

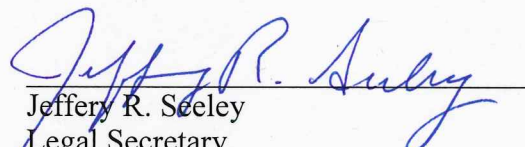
S. Bradley Van Cleve (C)
Davison Van Cleve PC
333 SW Taylor - Suite 400
Portland OR 97204
bvc@dvclaw.com

Sarah Wallace
Pacific Power
825 NE Multnomah St Suite 1800
Portland OR 97232
sarah.wallace@pacificorp.com

Benjamin Walters (C)
City of Portland - City Attorney's Office
1221 SW 4th Avenue - Room 430
Portland OR 97204
ben.walters@portlandoregon.gov

Nancy L. Werner (C)
Beery, Elsner & Hammond LLP
1750 SW Harbor Way, Suite 380
Portland OR 97201-5016
nancy@gov-law.com

(C)= Confidential


Jeffery R. Seeley
Legal Secretary
Natural Resources Section