



CITY OF  
**PORTLAND, OREGON**  
OFFICE OF THE CITY ATTORNEY

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July 31, 2013

Public Utility Commission of Oregon  
550 Capitol St NE #215  
PO Box 2148  
Salem, OR 97308-2148

Re: **Docket No. UE 262** – In the Matter of Portland General Electric  
Company, Request for a General Rate Revision

Dear Filing Center:

Enclosed for filing is an original and one copy of the City of Portland's Motion to Admit Opening Testimony and Exhibits. The original Declarations of David Tooze, Richard Gray and Anne Falcon are also attached.

This document was filed by electronic email and copies have been served on all parties in this proceeding as identified in the attached service list.

Sincerely,

Benjamin E. Walters  
Chief Deputy City Attorney

BW:lw  
Enclosures  
cc: Service List-UE 262

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 262

In the Matter of  
Portland General Electric Company:  
Request for General Rate Revision

CITY OF PORTLAND'S MOTION TO  
ADMIT OPENING TESTIMONY AND  
EXHIBITS

Pursuant to OAR 860-001-0350(7), the City of Portland respectfully requests that the Administrative Law Judge admit its Opening Testimony and Exhibits (COP/100-107; COP/200-204; and COP/300), filed June 14, 2013, into the record in this proceeding. The City of Portland's testimony and exhibits were previously filed with the Commission in this docket. The affidavits of Richard Gray, David Tooze and Anne Falcon, attesting to the truthfulness of their related testimony, are attached to this motion.

Dated this 31st day of July, 2013.

/s/Benjamin Walters

Benjamin Walters  
Chief Deputy City Attorney  
City of Portland, Oregon  
Office of City Attorney  
1221 SW 4<sup>th</sup> Ave, Suite 430  
Portland, OR 97204-1991  
503-823-4047  
Benjamin.walters@portlandoregon.gov

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 262**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

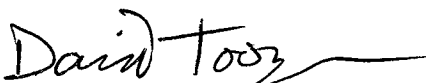
**DECLARATION OF DAVID TOOZE**

Request for General Rate Revision

I, DAVID TOOZE, do hereby declare as follows:

1. My full name is David Tooze. I am a Senior Energy Specialist for the Bureau of Planning and Sustainability at the City of Portland.
2. On June 14, 2013, my Direct Testimony and Exhibits (COP 300) were filed in this proceeding on behalf of the City of Portland, Oregon.
3. To the best of my knowledge, my testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.
4. I declare under penalty of perjury that the above-referenced information is true and correct.

DATED this 25<sup>th</sup> day of July, 2013.

  
\_\_\_\_\_  
DAVID TOOZE

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 262**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

**DECLARATION OF RICHARD GRAY**

Request for General Rate Revision

I, RICHARD GRAY, do hereby declare as follows:

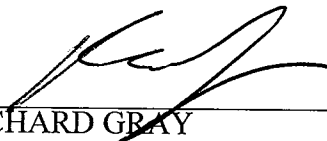
1. My full name is Richard Gray. I am a Senior Management Analyst for the City of Portland's Bureau of Transportation.

2. On June 14, 2013, my Direct Testimony and Exhibits (COP 200-204) were filed in this proceeding on behalf of the City of Portland, Oregon.

3. To the best of my knowledge, my testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

I declare under penalty of perjury that the above-referenced information is true and correct.

DATED this 26 day of July, 2013.

  
\_\_\_\_\_  
RICHARD GRAY

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 262**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

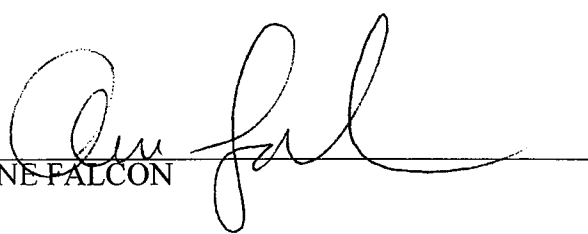
**DECLARATION OF ANNE FALCON**

Request for General Rate Revision

I, ANNE FALCON, do hereby declare as follows:

1. My full name is Anne Falcon. I am a managing director of Management Services for EES Consulting.
2. On June 14, 2013, my Direct Testimony and Exhibits (COP 100-107) were filed in this proceeding on behalf of the City of Portland, Oregon.
3. To the best of my knowledge, my testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.
4. I declare under penalty of perjury that the above-referenced information is true and correct.

DATED this 25 day of July, 2013.

  
ANNE FALCON

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing CITY OF PORTLAND'S MOTION TO  
ADMIT TESTIMONY AND EXHIBITS on:

Public Utility Commission of Oregon  
550 Capitol St NE #215  
PO Box 2148  
Salem, OR 97308-2148

on the 31<sup>st</sup> day of July, 2013 by electronic copy to email address

PUC.filingcenter@state.or.us.

I further certify that I served a copy of the foregoing on the individuals listed on  
the attached service list by electronic email on the 31<sup>st</sup> day of July, 2013.

/s/ Benjamin Walters

Benjamin Walters, OSB #853546  
Chief Deputy City Attorney  
Attorneys for City of Portland

## UE 262 – SERVICE LIST

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