

ELLEN F. ROSENBLUM  
Attorney General



FREDERICK M. BOSS  
Deputy Attorney General

**DEPARTMENT OF JUSTICE**  
GENERAL COUNSEL DIVISION

September 23, 2014

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

Re: *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision*  
OPUC Docket No.: UE 283  
DOJ File No.: 860115-GB0259-14

Enclosed for filing with the Commission today, please find an original and one copy of MOTION TO ADMIT PRE-FILED STAFF TESTIMONY and the Affidavits by Staff witnesses Marianne Gardner, Matt Muldoon, Brian Bahr, Linnea Wittekind, Deborah Garcia, George R. Compton, Suparna Bhattacharya, Jorge Ordonez, Judy Johnson, and John Crider, in the above-captioned docket.

Sincerely,

Stephanie S. Andrus  
Senior Assistant Attorney General  
Business Activities Section

Enclosures  
SSA:jrs/#5849977  
c: UE 283 Service list

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 283**

In the Matter of  
  
PORTLAND GENERAL ELECTRIC  
COMPANY  
  
Request for a General Rate Revision

MOTION TO ADMIT PRE-FILED STAFF  
TESTIMONY

Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law Judge to admit the following pre-filed exhibits into the record in the above-captioned docket:

<b>Exhibit No.</b>	<b>Exhibit</b>
Staff Exhibit 100	Opening Testimony of Marianne Gardner
Staff Exhibit 101	Witness Qualification Statement of Marianne Gardner
Staff Exhibit 200	Opening Testimony of Matt Muldoon
Staff Exhibit 201	Witness Qualification Statement of Matt Muldoon
Staff Exhibit 202	Staff Peer Screening
Staff Exhibit 203	Staff Three Stage DCF Modeling
Staff Exhibit 204	Staff Synthetic Forward Curve TIPS Analysis
Staff Exhibit 205	Staff Historical GDP Analysis with BEA Data
Staff Exhibit 206	Representative GDP Growth Projections
Staff Exhibit 300	Opening Testimony of Lance Kaufman
Staff Exhibit 301	Witness Qualification Statement of Lance Kaufman
Staff Exhibit 302	PGE Responses to Staff Data Requests
Staff Exhibit 303	Confidential Exhibit in Support of Testimony
Staff Exhibit 304	Confidential Exhibit in Support of Testimony

Staff Exhibit 305	Docket No. UE 262 Forecast and Actuals (Sales)
Staff Exhibit 306	Staff Price Adjustment Forecast
Staff Exhibit 307	Exhibit in Support of Testimony (Postage Rates)
Staff Exhibit 308	Confidential Exhibit in Support of Testimony
Staff Exhibit 309	Exhibit in Support of Testimony (Cost allocation)
Staff Exhibit 310	Staff Revised PGE 2015 Marginal Cost Study/Summary of Customer Service Marginal Costs
Staff Exhibit 311	Staff Customer Marginal Cost Adjustment to PGE Estimated Effect on Consumer's Total Electric Bills with PW2 and Tucannon
Staff Exhibit 312	Example of line extension customer charge and refund calculations
Staff Exhibit 313	Utility materials re: reactive power demand charge
Staff Exhibit 400	Opening Testimony of Brian Bahr
Staff Exhibit 401	Witness Qualification Statement of Brian Bahr
Staff Exhibit 402	Exhibits in Support of Testimony
Staff Exhibit 500	Opening Testimony of Linnea Wittekind
Staff Exhibit 501	Witness Qualification Statement of Linnea Wittekind
Staff Exhibit 502	Confidential Exhibit in Support of Testimony
Staff Exhibit 503	Directors and Officers Liability Survey
Staff Exhibit 504	Excerpt from Order No. 09-020
Staff Exhibit 600	Opening Testimony of Deborah Garcia
Staff Exhibit 601	Witness Qualification Statement of Deborah Garcia
Staff Exhibit 700	Opening Testimony of George R. Compton
Staff Exhibit 701	Witness Qualification Statement of George R. Compton
Staff Exhibit 702	PGE Tables re: estimated effects on consumer's total electric bills of PW2 and Tucannon with and without wind

Staff Exhibit 703	PGE Table reflecting Staff's CIO recommendations estimated effect on consumers' total electric bills with PW 2 and Tucannon
Staff Exhibit 704	Staff-Recommended Production Cost Pricing for Schedule 83
Staff Exhibit 800	Opening Testimony of Suparna Bhattacharya
Staff Exhibit 801	Witness Qualification Statement of Suparna Bhattacharya
Staff Exhibit 802	PGE Responses to Staff Data Requests
Staff Exhibit 803	Confidential Exhibit in support of Staff Testimony
Staff Exhibit 804	Marginal Cost Allocations Across Schedules
Staff Exhibit 900	Opening Testimony of Jorge Ordonez
Staff Exhibit 901	Witness Qualification Statement of Jorge Ordonez
Staff Exhibit 902	Conditions for tariff riders for PW2 and Tucannon
Staff Exhibit 1000	Opening Testimony of Judy Johnson
Staff Exhibit 1001	Witness Qualification Statement of Judy Johnson
Staff Exhibit 1100	Opening Testimony of Ryan Bracken
Staff Exhibit 1101	Witness Qualification Statement of Ryan Bracken
Staff Exhibit 1102	Brief summary of legislative history of SB 838
Staff Exhibit 1103	PGE Responses to Data Requests
Staff Exhibit 1104	Confidential Exhibit in Support of Testimony
Staff Exhibit 1200	Opening Testimony of John Crider
Staff Exhibit 1201	Witness Qualification Statement of John Crider
Staff Exhibit 1300	Joint Rebuttal Testimony of George R. Compton and Suparna Bhattacharya
Staff Exhibit 1400	Rebuttal Testimony of Matt Muldoon
Staff Exhibit 1401	Updated Value Line Dividends
Staff Exhibit 1402	Updated Value Line Earnings Per Share

Staff Exhibit 1403	U.S. Population Trend
Staff Exhibit 1404	The Economist on GDP Growth
Staff Exhibit 1405	Value Line (VL) Electric Utility Reports
Staff Exhibit 1406	Spreads over U.S. Treasuries by Utility Credit Rating
Staff Exhibit 1407	“Utilities Get No Jolt Despite Improving Economy,” WSJ
Staff Exhibit 1408	PGE 2014 Q2 Earnings Call CAPX Slides
Staff Exhibit 1500	Rebuttal Testimony of John Crider
Staff Exhibit 1600	Rebuttal Testimony of Marianne Gardner
Staff Exhibit 1601	Confidential Exhibit in Support of Testimony

The Motion to Admit Staff Exhibits is supported by Affidavits by Staff witnesses Marianne Gardner, Matt Muldoon, Brian Bahr, Linnea Wittekind, Deborah Garcia, George R. Compton, Suparna Bhattacharya, Jorge Ordonez, Judy Johnson, and John Crider that attest to the truthfulness of their testimony. The Affidavits are attached to this motion.

DATED this 23 day of September 2014.

Respectfully submitted,

ELLEN F. ROSENBLUM  
Attorney General

Stephanie S. Andrus, #92512  
Senior Assistant Attorney General  
Of Attorneys for Staff of the Public Utility  
Commission of Oregon

1 BEFORE THE PUBLIC UTILITY COMMISSION  
2 OF OREGON

3 UE 283

4 In the Matter of  
5 PORTLAND GENERAL ELECTRIC  
6 COMPANY

7 Request for a General Rate Revision

AFFIDAVIT OF MARIANNE GARDNER

8 State of Oregon )  
9 County of Marion ) ss.

10  
11 I, MARIANNE GARDNER, depose and say:

- 12 1. I am employed at the Public Utility Commission of Oregon as a Senior Revenue  
13 Requirement Analyst in the Rates, Finance and Audit Section of the Energy Division.  
14 2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as  
15 Staff Exhibit 100, a witness qualification statement pre-filed as Staff Exhibit 101, and  
16 Rebuttal Testimony pre-filed as Staff Exhibit 1600.  
17 3. To the best of my knowledge, my pre-filed testimony and the statements in my witness  
18 qualification statement are true and accurate.

19  
20 Signed this 18 day of September, 2014.

21 Marianne Gardner  
22 MARIANNE GARDNER

23 SUBSCRIBED AND SWORN to before me this 18 day of September, 2014.

24 M Warner  
25 Notary Public for Oregon  
26 My Commission expires: 7-20-15



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 283**

In the Matter of  
 PORTLAND GENERAL ELECTRIC  
 COMPANY  
 Request for a General Rate Revision

AFFIDAVIT OF MATT MULDOON

State of Oregon         )  
                                    ) ss.  
 County of Marion         )

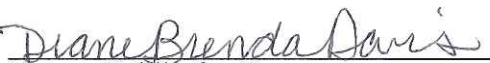
I, MATT MULDOON, depose and say:

1. I am employed at the Public Utility Commission of Oregon as a Senior Economist in the Rates, Finance and Audit Section of the Energy Division.
2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as Staff Exhibit 200, a witness qualification statement pre-filed as Staff Exhibit 201, and Rebuttal Testimony pre-filed as Staff Exhibit 1400.
3. To the best of my knowledge, my pre-filed testimony and the statements in my witness qualification statement are true and accurate.

Signed this 18<sup>th</sup> day of September, 2014.

  
 \_\_\_\_\_  
 MATT MULDOON

SUBSCRIBED AND SWORN to before me this 18<sup>th</sup> day of September, 2014.

  
 \_\_\_\_\_  
 Notary Public for Oregon  
 My Commission expires: 04-24-2018



1 BEFORE THE PUBLIC UTILITY COMMISSION  
2 OF OREGON

3 UE 283

4 In the Matter of  
5 PORTLAND GENERAL ELECTRIC  
6 COMPANY  
7 Request for a General Rate Revision

AFFIDAVIT OF BRIAN BAHR

8 State of Oregon )  
9 County of Marion ) ss.

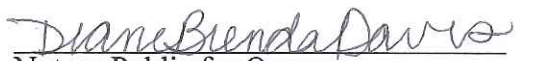
10  
11 I, BRIAN BAHR, depose and say:

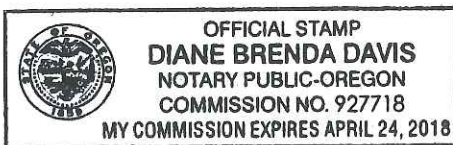
- 12 1. I am employed at the Public Utility Commission of Oregon as a Senior Utility Analyst in  
13 the Rates, Finance and Audit Section of the Energy Division.  
14 2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as  
15 Staff Exhibit 400 and a witness qualification statement pre-filed as Staff Exhibit 401.  
16 3. To the best of my knowledge, my pre-filed testimony and the statements in my witness  
17 qualification statement are true and accurate.

18  
19 Signed this 18 day of September, 2014.

  
BRIAN BAHR

20  
21 SUBSCRIBED AND SWORN to before me this 18<sup>th</sup> day of September, 2014.

  
Notary Public for Oregon  
My Commission expires: 04-24-2018





BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 283

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY  
Request for a General Rate Revision


AFFIDAVIT OF LINNEA WITTEKIND

State of Oregon )  
County of Marion ) ss.

I, LINNEA WITTEKIND, depose and say:

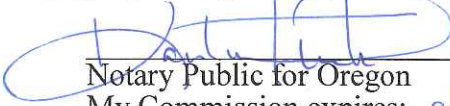
- 1. I am employed at the Public Utility Commission of Oregon as a Senior Financial Analyst in the Energy - Rates, Finance and Audit Division.
- 2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as Staff Exhibit 500 and a witness qualification statement pre-filed as Staff Exhibit 501.
- 3. To the best of my knowledge, my pre-filed testimony and the statements in my witness qualification statement are true and accurate.

Signed this 22 day of September, 2014.

  
LINNEA WITTEKIND

SUBSCRIBED AND SWORN to before me this 22nd day of September, 2014.



  
Notary Public for Oregon  
My Commission expires: 8/31/15

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 283

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY  
Request for a General Rate Revision

AFFIDAVIT OF DEBORAH GARCIA

State of Oregon        )  
                                  ) ss.  
County of Marion        )

I, DEBORAH GARCIA, depose and say:

- 1. I am employed at the Public Utility Commission of Oregon as a Senior Financial Analyst in the Energy - Rates, Finance and Audit Division.
- 2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as Staff Exhibit 600 and a witness qualification statement pre-filed as Staff Exhibit 601.
- 3. To the best of my knowledge, my pre-filed testimony and the statements in my witness qualification statement are true and accurate.

Signed this 18<sup>th</sup> day of September, 2014.

*Deborah Garcia*  
DEBORAH GARCIA

SUBSCRIBED AND SWORN to before me this 18 day of September, 2014.

*M Warner*  
Notary Public for Oregon  
My Commission expires: 7-20-15



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 283

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY  
Request for a General Rate Revision

AFFIDAVIT OF GEORGE R. COMPTON

State of Oregon        )  
                                  ) ss.  
County of Marion        )

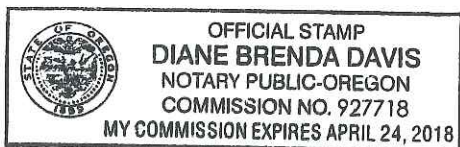
I, GEORGE R. COMPTON, depose and say:

1. I am employed at the Public Utility Commission of Oregon as a Senior Economist in the Energy - Rates, Finance and Audit Division.
2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as Staff Exhibit 700 and a witness qualification statement pre-filed as Staff Exhibit 701. I also drafted Joint Rebuttal Testimony with another Staff witness, pre-filed as Staff Exhibit 1300.
3. To the best of my knowledge, my pre-filed testimonies and the statements in my witness qualification statement are true and accurate.

Signed this 18 day of September, 2014.

*George R. Compton*  
\_\_\_\_\_  
GEORGE R. COMPTON

SUBSCRIBED AND SWORN to before me this 18<sup>th</sup> day of September, 2014.



*Diane Brenda Davis*  
\_\_\_\_\_  
Notary Public for Oregon  
My Commission expires: 04-24-18

1 BEFORE THE PUBLIC UTILITY COMMISSION  
2 OF OREGON

3 UE 283

4 In the Matter of  
5 PORTLAND GENERAL ELECTRIC  
6 COMPANY

7 Request for a General Rate Revision

AFFIDAVIT OF SUPARNA  
BHATTACHARYA

8 State of Oregon )  
9 County of Marion ) ss.

10 I, SUPARNA BHATTACHARYA, depose and say:

- 11 1. I am employed at the Public Utility Commission of Oregon as a Utility Economist in the  
12 Energy – Rates, Finance, and Audit Division.
- 13 2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as  
14 Staff Exhibit 800, a witness qualification statement pre-filed as Staff Exhibit 801, and  
15 draft Joint Testimony with another Staff witness, pre-filed as Staff Exhibit 1300.
- 16 3. I have reviewed and also adopt testimony drafted by Staff witness Lance Kaufman, pre-  
17 filed as Staff Exhibit 300.
- 18 4. To the best of my knowledge, my pre-filed testimony, the statements in my witness  
19 qualification statement, and the pre-filed testimony of Lance Kaufman are true and  
20 accurate.

21 Signed this 18 day of September, 2014.

22 Suparna Bhattacharya  
23 SUPARNA BHATTACHARYA

24 SUBSCRIBED AND SWORN to before me this 18 day of September, 2014.



25 Melanie Warner  
26 Notary Public for Oregon  
My Commission expires: 7-20-15

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 283

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY  
Request for a General Rate Revision

AFFIDAVIT OF JORGE ORDONEZ

State of Oregon )  
County of Marion ) ss.

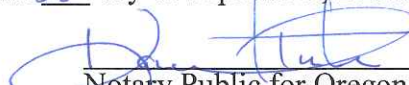
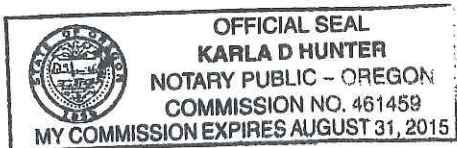
I, JORGE ORDONEZ, depose and say:

1. I am employed at the Public Utility Commission of Oregon as a Senior Financial Economist in the Energy Resources and Planning Section.
2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as Staff Exhibit 900, and a witness qualification statement pre-filed as Staff Exhibit 901.
3. To the best of my knowledge, my pre-filed testimony and the statements in my witness qualification statement are true and accurate.

Signed this 22<sup>nd</sup> day of September, 2014.

  
JORGE ORDONEZ

SUBSCRIBED AND SWORN to before me this 22<sup>nd</sup> day of September, 2014.

  
Notary Public for Oregon  
My Commission expires: 8/31/15

1 BEFORE THE PUBLIC UTILITY COMMISSION  
2 OF OREGON

3 UE 283

4 In the Matter of  
5 PORTLAND GENERAL ELECTRIC  
6 COMPANY  
7 Request for a General Rate Revision

AFFIDAVIT OF JUDY JOHNSON

8 State of Oregon )  
9 County of Marion ) ss.

10  
11 I, JUDY JOHNSON, depose and say:

- 12 1. I am employed at the Public Utility Commission of Oregon as a Senior Financial
- 13 Economist in the Energy Resources and Planning Section.
- 14 2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as
- 15 Staff Exhibit 1000, and a witness qualification statement pre-filed as Staff Exhibit 1001.
- 16 3. To the best of my knowledge, my pre-filed testimony and the statements in my witness
- 17 qualification statement are true and accurate.

18  
19 Signed this 18 day of September, 2014.

*Judy Johnson*  
\_\_\_\_\_  
JUDY JOHNSON

20  
21 SUBSCRIBED AND SWORN to before me this 18 day of September, 2014.

*Melanie Warner*  
\_\_\_\_\_  
Notary Public for Oregon  
My Commission expires: 7-20-15



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 283

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY

AFFIDAVIT OF JOHN CRIDER

Request for a General Rate Revision

State of Oregon )  
County of Marion ) ss.

I, JOHN CRIDER, depose and say:


1. I am employed at the Public Utility Commission of Oregon as a Senior Power Cost Analyst in the Energy Resources and Planning Section of the Energy Division.
2. In the course of my employment, I drafted Opening Testimony, pre-filed in this docket as Staff Exhibit 1200, a witness qualification statement pre-filed as Staff Exhibit 1201, and Rebuttal Testimony pre-filed as Staff Exhibit 1500. I have also reviewed the testimony prepared by Staff witness Ryan Bracken, pre-filed as Staff Exhibit 1100 and adopt it as my testimony.
3. To the best of my knowledge, my testimony, the statements in my witness qualification statement, and the pre-filed testimony of Staff witness, are true and accurate.

Signed this 18 day of September, 2014.

  
\_\_\_\_\_  
JOHN CRIDER

SUBSCRIBED AND SWORN to before me this 18 day of September, 2014.



  
\_\_\_\_\_  
Notary Public for Oregon  
My Commission expires: 7-20-15

## CERTIFICATE OF SERVICE

I certify that on September 23, 2014, I served the foregoing MOTION TO ADMIT PRE-FILED STAFF TESTIMONY with Affidavits by Staff witnesses Marianne Gardner, Matt Muldoon, Brian Bahr, Linnea Wittekind, Deborah Garcia, George R. Compton, Suparna Bhattacharya, Jorge Ordonez, Judy Johnson, and John Crider upon the following parties in this proceeding by sending a true, exact and full copy by electronic mail only as all parties waive paper service.

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

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

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

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

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

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

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

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

Wendy Gerlitz (C)  
NW Energy Coalition  
1205 SE Flavel  
Portland OR 97202  
wendy@nwenergy.org

Judy Johnson (C)  
Public Utility Commission of  
Oregon  
PO Box 1088  
Salem OR 97308-1088  
judy.johnson@state.or.us

Bradley Mullins (C)  
Mountain West Analytics  
333 SW Taylor, Suite 400  
Portland OR 97204  
brmullins@mwanalytics.com

Mark R. Thompson  
Northwest Natural  
220 NW 2<sup>nd</sup> Avenue  
Portland OR 97209  
mark.thompson@nwnatural.com

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

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

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

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

Tyler C. Pepple (C)  
Davison Van Cleve, PC  
333 SW Taylor Suite 400  
Portland OR 97204  
tcp@dvclaw.com

Douglas C. Tingey (C)  
Portland General Electric  
121 SW Salmon 1WTC1301  
Portland OR 97204  
doug.tingey@pgn.com



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

David Tooze  
City Of Portland - Planning &  
Sustainability  
1900 SW 4<sup>th</sup>, 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  
City Of Portland - City Attorney's  
Office  
1221 SW 4<sup>th</sup> Avenue - Room 430  
Portland OR 97204  
ben.walters@portlandoregon.gov

(C) = Confidential

DATED this 23<sup>rd</sup> day of September, 2014.



Karen R. Tofte  
Legal Assistant  
Business Activities Section