

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

3 UE 316

4 In the Matter of  
5 IDAHO POWER COMPANY,  
6 Request to Increase Rates for Electric Service  
7 to Recover Costs Associated with Valmy  
8 Power Plant.

STAFF'S MOTION TO ADMIT  
PRE-FILED TESTIMONY

9 Pursuant to OAR 860-001-0420(2), Staff of the Public Utility Commission of Oregon  
10 (Staff) files this motion to request that Administrative Law Judge Rowe admit the following pre-  
11 filed exhibits into the record in the above-captioned docket:

- 12 • Staff/100-106 (Reply Testimony and Exhibits of Scott Gibbens)
- 13 • Staff/200-205 (Reply Testimony and Exhibits of Ming Peng)
- 14 • Staff/300-304 (Reply Testimony and Exhibits of Max St. Brown)

15 This Motion to Admit Pre-Filed Testimony is supported by the declarations of Staff  
16 witnesses Scott Gibbens, Ming Peng and Max St. Brown that attest to the truthfulness of their  
17 testimony. The declarations are attached to this motion.

18 DATED this 29 day of June, 2017.

19 Respectfully submitted,

20 ELLEN F. ROSENBLUM  
21 Attorney General

22 

23 Sommer Moser, OSB # 105260  
24 Assistant Attorney General  
25 Of Attorneys for Staff of the Public Utility  
26 Commission of Oregon

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

3 **UE 316**

4 In the Matter of  
5 IDAHO POWER COMPANY,  
6 Request to Increase Rates for Electric Service  
7 to Recover Costs Associated with Valmy  
8 Power Plant

DECLARATION OF  
SCOTT GIBBENS

9 I, SCOTT GIBBENS, declare under penalty of perjury under the laws of the state of  
10 Oregon:

- 11 1. My name is Scott Gibbens. I am employed by the Public Utility Commission of  
12 Oregon as a Senior Economist in the Energy Rates, Finance and Audit Division.  
13 2. I am the same Scott Gibbens who prepared Staff Exhibits 100 to 106.  
14 3. My pre-filed exhibits are true and accurate based on my knowledge and belief.

15 I hereby declare that the above statement is true to the best of my knowledge and belief,  
16 and that I understand it is made for use as evidence before the Public Utility Commission of  
17 Oregon and is subject to penalty for perjury.

18  
19 SIGNED this 29<sup>th</sup> day of June, 2017 at Salem, Oregon.

20  
21 Signed: \_\_\_\_\_  
22  
23  
24  
25  
26

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**  
3 **UE 316**

4 In the Matter of  
5 IDAHO POWER COMPANY,  
6 Request to Increase Rates for Electric Service  
7 to Recover Costs Associated with Valmy  
Power Plant

DECLARATION OF  
MING PENG

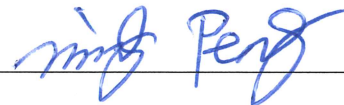
8  
9 I, MING PENG, declare under penalty of perjury under the laws of the state of Oregon:

- 10 1. My name is Ming Peng. I am employed by the Public Utility Commission of Oregon  
11 as a Senior Economist in the Energy Rates, Finance and Audit Division.  
12 2. I am the same Ming Peng who prepared Staff Exhibits 200 to 205.  
13 3. My pre-filed exhibits are true and accurate based on my knowledge and belief.

14 I hereby declare that the above statement is true to the best of my knowledge and belief,  
15 and that I understand it is made for use as evidence before the Public Utility Commission of  
16 Oregon and is subject to penalty for perjury.

17  
18 SIGNED this 28 day of June, 2017 at Salem, Oregon.

19  
20 Signed: \_\_\_\_\_



1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UE 316**

4 In the Matter of

5 IDAHO POWER COMPANY,

6 Request to Increase Rates for Electric Service  
7 to Recover Costs Associated with Valmy  
Power Plant

DECLARATION OF  
MAX ST. BROWN

8  
9 I, MAX ST. BROWN, declare under penalty of perjury under the laws of the state of  
10 Oregon:

- 11 1. My name is Max St. Brown. I am employed by the Public Utility Commission of  
12 Oregon as a Senior Utility Economist in the Energy Rates, Finance and Audit Division.  
13 2. I am the same Max St. Brown who prepared Staff Exhibits 300 to 304.  
14 3. My pre-filed exhibits are true and accurate based on my knowledge and belief.

15 I hereby declare that the above statement is true to the best of my knowledge and belief,  
16 and that I understand it is made for use as evidence before the Public Utility Commission of  
17 Oregon and is subject to penalty for perjury.

18  
19 SIGNED this 28 day of June, 2017 at Salem, Oregon.

20  
21 Signed: Max St. Brown  
22  
23  
24  
25  
26