

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

3 UE 358

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Advice No. 19-02, New Load Direct Access
8 Program.

STAFF'S MOTION TO ADMIT
PRE-FILED TESTIMONY

9 Staff of the Public Utility Commission of Oregon (Staff) moves for admission of the
10 following pre-filed testimony and exhibits into the record in the above-captioned docket:

- 11 • Staff/100-102 (Opening Testimony and Exhibits of Scott Gibbens)
12 • Staff/200-203 (Opening Testimony and Exhibits of Sabrina Soldavini)
13 • Staff/300 (Rebuttal and Cross-Answering Testimony of Scott Gibbens)
14 • Staff/400 (Rebuttal and Cross-Answering Testimony of Sabrina Soldavini)

15 This motion is supported by the declarations of Staff witnesses Scott Gibbens and
16 Sabrina Soldavini that attests to the truthfulness of their testimony. The declarations are
17 attached to this motion.

18
19 DATED this 28 day of October, 2019.

20 Respectfully submitted,

21 ELLEN F. ROSENBLUM
22 Attorney General

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

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DECLARATION OF
SCOTT GIBBENS

9 I, Scott Gibbens, declare under penalty of perjury under the laws of the State of Oregon:

10 1. My name is Scott Gibbens. I am a Senior Economist for the Public Utility
11 Commission of Oregon ("Staff") in the Energy Rates, Finance and Audit Division.

12 2. On behalf of Staff, I drafted pre-filed opening testimony and rebuttal and cross-
13 answering testimony submitted for use in this docket as Staff Exhibits 100-102 and 300.

14 3. To the best of my knowledge, my pre-filed testimony is true and accurate.

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 SIGNED this 28th day of October, 2019 at Salem, Oregon.

19
20
21 Signed: 

Scott Gibbens

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DECLARATION OF
SABRINNA SOLDAVINI

9 I, Sabrinna Soldavini, declare under penalty of perjury under the laws of the State of
10 Oregon:

11 1. My name is Sabrinna Soldavini. I am a Senior Regulatory Analyst for the Public
12 Utility Commission of Oregon ("Staff") in the Energy Rates, Finance and Audit Division.

13 2. On behalf of Staff, I drafted pre-filed opening testimony and rebuttal and cross-
14 answering testimony submitted for use in this docket as Staff Exhibits 200-203 and 400.

15 3. To the best of my knowledge, my pre-filed testimony is true and accurate.

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

20 SIGNED this 25th day of October, 2019 at Salem, Oregon.

21
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23 Signed: _____

Sabrinna Soldavini