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June 24, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
Renewable Resource Automatic Adjustment Clause (Schedule 122)
Docket No. UE 370; and
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
Renewable Resource Automatic Adjustment Clause (Schedule 122)
(BPSC Energy Storage Microgrid and ARC Energy Storage)
Docket No. UE 372 (Consolidated)

Dear Filing Center:

Please find enclosed the Motion to Admit Pre-filed Testimony and Exhibits of the Alliance of Western Energy Consumers in the above-referenced dockets.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 370, UE 372

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	MOTION TO ADMIT PRE-FILED
COMPANY,)	TESTIMONY AND EXHIBITS OF THE
)	ALLIANCE OF WESTERN ENERGY
)	CONSUMERS
Renewable Resource Automatic Adjustment)	
Clause (Schedule 122) (Wheatridge Renewable)	
Energy Farm) (UE 370), and)	
)	
Renewable Resource Automatic Adjustment)	
Clause (Schedule 122) (BPS Energy Storage)	
<u>Microgrid and ARC Energy Storage) (UE 372).</u>)	

The Alliance of Western Energy Consumers (“AWEC”) moves for admission into the record of this proceeding the following pre-filed testimony and exhibits submitted on behalf of AWEC.

<u>Exhibit</u>	<u>Description</u>
AWEC/100	Confidential Opening Testimony of Bradley G. Mullins
AWEC/101	Qualification Statement of Bradley G. Mullins
AWEC/102	Confidential PGE Responses to Data Requests
AWEC/103	Confidential Revenue Requirement Adjustment Calculations
AWEC/200	Confidential Rebuttal Testimony of Bradley G. Mullins

<u>Exhibit</u>	<u>Description</u>
AWEC/201	Confidential PGE Responses to Data Requests
AWEC/202	Confidential Net Revenue Requirement Forecast of Wheatridge in PGE Cost Containment Screener

The Declaration of Bradley G. Mullins attesting to the truth and accuracy of his testimony and exhibit filings is attached.

Dated this 24th day of June, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 370, UE 372

In the Matter of)	
)	DECLARATION OF
PORTLAND GENERAL ELECTRIC)	BRADLEY G. MULLINS
COMPANY,)	
)	
Renewable Resource Automatic Adjustment)	
Clause (Schedule 122) (Wheatridge Renewable)	
Energy Farm) (UE 370), and)	
)	
Renewable Resource Automatic Adjustment)	
Clause (Schedule 122) (BPSC Energy Storage)	
<u>Microgrid and ARC Energy Storage) (UE 372).</u>)	

I, BRADLEY G. MULLINS, state the following, under penalty of perjury in the State of Oregon:

1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers (“AWEC”) in this matter.

2. I sponsored testimony and exhibit filings (AWEC/100-103 and AWEC/200-202) on behalf of AWEC in this matter.

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

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

SIGNED this 19 day of June, 2020.



BRADLEY G. MULLINS