1	BEFORE THE PUBLIC U	TILITY COMMISSION
2	OF ORE	EGON
3	UE 370, 1	UE 372
4 5 6 7 8 9	In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Renewable Resource Automatic Adjustment Clause (Schedule 122) (Wheatridge) (UE 370) Renewable Resource Automatic Adjustment Clause (Schedule 122) (BPSC Energy Storage Microgrid and ARC Microgrid) (UE 372)	MOTION TO ADMIT PRE-FILED STAFF TESTIMONY
1011)	

Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law

Judge to admit the following pre-filed Staff Exhibits into the record in the above-captioned

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docket:

13	r	
16	Exhibit No.	Exhibit
17	Staff Exhibit 100	Opening Testimony of Steven T. Storm
18	Staff Exhibit 101	Witness Qualification Statement of Steven T. Storm
19	Staff Exhibit 102	PGE Response to Staff Data Request No. 030
20	Staff Exhibit 103	PGE Response to Staff Data Request No. 025
21	Staff Exhibit 104	PGE Response to Staff Data Request No. 027
22	Staff Exhibit 200	Opening Testimony of Caroline F. Moore
23	Staff Exhibit 201	Witness Qualification Statement of Caroline F. Moore
24	Staff Exhibit 202	PGE Renewable Power FAQs
25	Staff Exhibit 203	PGE News Release
2021222324	Staff Exhibit 103 Staff Exhibit 104 Staff Exhibit 200 Staff Exhibit 201 Staff Exhibit 202	PGE Response to Staff Data Request No. 025 PGE Response to Staff Data Request No. 027 Opening Testimony of Caroline F. Moore Witness Qualification Statement of Caroline F. Moore PGE Renewable Power FAQs

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Page 1 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UE 370/372) JMR//pjr/10309332

1	Staff Exhibit 204	Product Content Label
2	Staff Exhibit 205	PGE Response to Staff Data Request – Confidential
3	Staff Exhibit 300	Opening Testimony of Moya Enright
4	Staff Exhibit 301	Witness Qualification Statement of Moya Enright
5	Staff Exhibit 302	PGE Responses to Staff Data Request – Confidential
6	Staff Exhibit 303	PGE Responses to Staff Data Request
7	Staff Exhibit 304	Staff workpaper - Confidential
8	Staff Exhibit 400	Rebuttal Testimony of Steven T. Storm
9	Staff Exhibit 401	PGE Partial Response to Staff Data Request No. 54 – Confidential in part
10	Staff Exhibit 500	Rebuttal Testimony of Caroline F. Moore
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This Motion to Admit Pre-Filed Staff Exhibits is supported by Declarations of Staff witnesses Steven T. Storm, Caroline F. Moore, and Moya Enright. The Declarations are attached to this motion.

15 DATED this 26th day of June 2020.

16	Respectfully submitted,
17	ELLEN F. ROSENBLUM
18	Attorney General

/s/ Johanna M. Riemenschneider

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20	Johanna M. Riemenschneider, #990083
21	Sommer Moser, #105260
21	Assistant Attorneys General
22	Of Attorneys for Staff of the Public Utility
	Commission of Oregon

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MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UE 370/372) $_{\mbox{\scriptsize JMR//pjr/10309332}}$ Page 2 -

1	BEFORE THE PUBLIC UTILITY	COMMISSION
2	OF OREGON	
3	UE 370, UE 372	
4	,	
5	In the Matter of)	
6	() E	DECLARATION OF CAROLINE F. MOORE
7 8	Renewable Resource Automatic Adjustment () Clause (Schedule 122) (Wheatridge) (UE 370)	CAROLINE F. MOUKE
9	Renewable Resource Automatic Adjustment) Clause (Schedule 122) (BPSC Energy Storage) Microgrid and ARC Microgrid) (UE 372)	
11	I, Caroline F. Moore, state the following, under penalty of	f perjury in the State of Oregon:
12	1. I am Chief Analyst for the Public Utility C	Commission of Oregon Staff ("Staff"). I
13	work in the Energy Resources and Planning Division.	
14	2. On behalf of Staff, I drafted the pre-filed	opening testimony submitted for use in
15	this docket as Staff Exhibit 200 and Staff Exhibit 201 (w	vitness qualification statement) and also
16	drafted the pre-filed rebuttal testimony submitted as Staff	Exhibit 500.
17	4. To the best of my knowledge, my	pre-filed testimony and my witness
18	qualification statement are true and accurate.	
19		
20 21	belief, and that I understand it is made for use as	·
22	r · · · · · · · · · · · · · · · · · · ·	
23	GIGNED (1' 10 1 CT 2000	
23	·	aroline Moore
	Caro	line F. Moore
25 26		
20		
age	ge 1 - UE 370, UE 372 - DECLARATION OF CAROLINE JLM/pjr//10293125	E F. MOORE

Department of Justice 1162 Court Street NE Salem, OR 97301-4096

Page 1 -

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

1	OF OREGON
2	UE 370, UE 372
3	In the Matter of
5	PORTLAND GENERAL ELECTRIC COMPANY, DECLARATION OF MOYA ENRIGHT
6 7	Renewable Resource Automatic Adjustment) Clause (Schedule 122) (Wheatridge) (UE 370)
8 9 10	Renewable Resource Automatic Adjustment Clause (Schedule 122) (BPSC Energy Storage Microgrid and ARC Microgrid) (UE 372)
1	
2	I, Moya Enright, state the following, under penalty of perjury in the State of Oregon:
3	1. I am a Senior Utility and Energy Analyst for the Public Utility Commission of
4	Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.
5	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
6	this docket as Staff Exhibit 300 and Staff Exhibit 301 (witness qualification statement).
7	4. To the best of my knowledge, my pre-filed testimony and my witness
8	qualification statement are true and accurate.
9 0 1	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.
2	aran 22
3	SIGNED this 23rd day of June 2020.
4	maid
5	Moya Enright
5	

Page 1 - UE 370, UE 372 - DECLARATION OF MOYA ENRIGHT JLM/pjr//10293129

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2		
3	UE 370, UE 372	
4	In the Matter of)	
5	PORTLAND GENERAL ELECTRIC) COMPANY,) DECLARATION OF	
6 7) STEVEN T. STORM Renewable Resource Automatic Adjustment) Clause (Schedule 122) (Wheatridge) (UE 370))	
8	Renewable Resource Automatic Adjustment) Clause (Schedule 122) (BPSC Energy Storage) Microgrid and ARC Microgrid) (UE 372))	
10		
11		
12	I, Steven T. Storm, state the following, under penalty of perjury in the State of Oregon:	
13	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff	
14	("Staff"). I work in the Energy Rates, Finance and Audit Division.	
15	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in	
16	this docket as Staff Exhibit 100 and Staff Exhibit 101 (witness qualification statement) and also	
17	drafted the pre-filed rebuttal testimony submitted as Staff Exhibit 400.	
18	4. To the best of my knowledge, my pre-filed testimony and my witness	
19	qualification statement are true and accurate.	
20		
21	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to	
22	penalty for perjury.	
23		
24	SIGNED this 23 day of June 2020.	
25	STEVEN T. STORM	
26	SILVEN I. STORWI	

Page 1 - UE 370, UE 372 - DECLARATION OF STEVEN T. STORM JLM/pjr//10293124