

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

3 UE 374

4 In the Matter of
5 PACIFICORP, dba PACIFIC POWER,
6 Request for a General Rate Revision.
7

STAFF’S MOTION TO ADMIT
PRE-FILED TESTIMONY AND EXHIBITS

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

Staff Opening Testimony	
Staff/100-102	John Fox
Staff/200-210	Matt Muldoon and Moya Enright
Staff/300-313	Brian Fjeldheim
Staff/400-403	Heather Cohen
Staff/500-501	Russell Beitzel
Staff/600-603	Mitchell Moore
Staff/700-703	Sabrinna Soldavini
Staff/800-803	Steve Storm
Staff/900-902	Ming Peng
Staff/1000-1003	John Fox
Staff/1100-1103	Max St. Brown
Staff/1200-1203	Paul Rossow

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1	Staff/1300-1301	Scott Gibbens
2	Staff/1400-1408	Yassir Rashid, Matt Muldoon and Nadine Hanhan
3	Staff/1500-1501	Rose Anderson
4	Staff/1600-1603	Kathy Zarate

6	Staff Rebuttal & Cross-Answering on Coal Decommissioning	
7	Staff/1700-1706	Steve Storm

9	Staff Rebuttal Testimony	
10	Staff/1800-1802	John Fox
11	Staff/1900-1912	Matt Muldoon, Moya Enright, Curtis Dlouhy
12	Staff/2000-2002	Steve Storm
13	Staff/2100-2108	Nadine Hanhan, Yassir Rashid and Matt Muldoon
14	Staff/2200	Rose Anderson
15	Staff/2300-2303	Sabrinna Soldavini
16	Staff/2400-2403	Scott Gibbens
17	Staff/2500-2502	Heather Cohen
18	Staff/2600-2602	Brian Fjeldheim
19	Staff/2700-2704	Mitch Moore
20	Staff/2800	Paul Rossow
21	Staff/2900-2901	Max St. Brown
22	Staff/3000-3001	Russell Beitzel

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1	Staff Cross-Examination Exhibits	
2	Staff/3300	PacifiCorp's Response to Staff DRs 92
3		(attachment), 126 (attachment), 272, 769,
4		770, 771 (CONF), 772 (CONF), 773 (with
5		attachment), 774, 775 and 776. Attachments
6		to PacifiCorp's responses to 123, 178, 242
7		and 696.
8	Staff/3400	PacifiCorp's Response to Staff DRs 311, 312
9		(1st Supplemental response), 313 (1st
10		Supplemental Response), 725, 726, 727
11		(CONF), 730, 794, 796, 797, 799, 800, 801,
12		803, 804, 807, 809, 811, 819 and 824;
13		PacifiCorp's Response to AWEC 057
14		(attachments only)
15	Staff/3500	PacifiCorp's Response to Staff DRs 530, 471,
16		499 (CONF), 826, 827, 828, 830 (CONF) and
17		831
18	Staff/3600	PacifiCorp's Response to Staff DR 793
19	Staff/3700	PacifiCorp's Response to Staff DRs 515, 761,
20		762, and 792 (with attachment)

21 This motion is supported by the declarations of Staff witnesses Matt Muldoon, Brian
22 Fjeldheim, Heather Cohen, Russell Beitzel, Ming Peng, Steve Storm, John Fox, Max St. Brown,
23 Paul Rossow, Nadine Hanhan, Rose Anderson, Kathy Zarate, Moya Enright, Scott Gibbens,
24 Sabrinna Soldavini, Yassir Rashid and Curtis Dlouhy that attest to the truthfulness of their
25 testimony. The declarations are attached to this motion. Due to extenuating circumstances, Staff
26 witness Mitch Moore was not available to sign a declaration as of the date of this filing. Staff

1 will file a declaration for Mr. Moore as soon as he is available, which is anticipated to be the
2 week of September 21, 2020.

3
4 DATED this 17th day of September, 2020.

5 Respectfully submitted,

6 ELLEN F. ROSENBLUM
7 Attorney General

8 */s/ Sommer Moser*

9

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

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DECLARATION OF
MATT MULDOON

7
8 I, Matthew J. (Matt) Muldoon, declare under penalty of perjury under the laws of the State
9 of Oregon:

10 1. My name is Matt Muldoon. I am Manager of Economic Analysis for the Public
11 Utility Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

12 2. On behalf of Staff, I co-drafted pre-filed testimony and exhibits submitted for use in
13 this docket as follows: Staff/200, Staff/201 (Witness Qualification Statement), Supporting Exhibits
14 Staff/203-210 & Staff 1400, Supporting Exhibits 1403-1408 (Reply Testimony); and Staff/1900,
15 Supporting Exhibits Staff/1902-1912; & Staff/2100, Supporting Exhibits 2102-2108 (Rebuttal
16 Testimony).

17 3. To the best of my knowledge, my pre-filed testimony and my witness qualification
18 statement are true and accurate.

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

22
23 SIGNED this 16th day of September, 2020 at Salem, Oregon.

24
25 Signed: Matthew J. Muldoon
26 Matt Muldoon

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

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In the Matter of

PACIFICORP, dba PACIFIC POWER,

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DECLARATION OF BRIAN FJELDHEIM

I, Brian Fjeldheim, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Brian Fjeldheim. I am a Senior Financial Analyst for the Public Utility Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in this docket as follows: Staff/300 (Opening Testimony), Staff/301 (Witness Qualification Statement) and Staff/2600 (Rebuttal Testimony).

3. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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

SIGNED this 16th day of September, 2020 at Salem, Oregon.

Signed: /s/ Brian Fjeldheim
Brian Fjeldheim

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DECLARATION OF
RUSSELL BEITZEL

8 I, Russell Beitzel, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Russell Beitzel. I am a Senior Utility Analyst for the Public Utility
10 Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

11 2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in
12 this docket as follows: Staff/500 (Opening Testimony), Staff/501 (Witness Qualification
13 Statement) and Staff/3000 (Rebuttal Testimony).

14 3. To the best of my knowledge, my pre-filed testimony and my witness qualification
15 statement are true and accurate.

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

19
20 SIGNED this 16 day of September, 2020 at Salem, Oregon.

21
22 Signed: /s/ Russell Beitzel
23 Russell Beitzel

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4 In the Matter of

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6 Request for a General Rate Revision

DECLARATION OF
MING PENG

8 I, Ming Peng, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Ming Peng. I am a Senior Econometrician for the Public Utility
10 Commission of Oregon ("Staff") in the Energy Rates, Finance and Audit Division.

11 2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in
12 this docket as follows: Staff/900 (Opening Testimony) and Staff/901 (Witness Qualification
13 Statement).

14 3. To the best of my knowledge, my pre-filed testimony and my witness qualification
15 statement are true and accurate.

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

19
20 SIGNED this 16th day of September, 2020 at Salem, Oregon.

21
22 Signed: _____

23 Ming Peng

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7

DECLARATION OF
STEVEN T. STORM

8 I, Steven T. Storm, declare under penalty of perjury under the laws of the State of Oregon:

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

11 2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in
12 this docket as follows: Staff/800 (Opening Testimony), Staff/801 (Witness Qualification
13 Statement), Staff Rebuttal & Cross-Answering Testimony (Staff/1700) and Staff/2000 (Rebuttal
14 Testimony).

15 3. To the best of my knowledge, my pre-filed testimony and my witness qualification
16 statement are true and accurate.

17 I hereby declare that the above statements are 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
21 SIGNED this 16th day of September, 2020 at Salem, Oregon.

22
23 Signed: 
24 Steven T. Storm
25
26

**BEFORE THE PUBLIC UTILITY COMMISSION
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In the Matter of

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DECLARATION OF MAX ST. BROWN

I, Max St. Brown, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Max St. Brown. I am a Senior Utility Analyst for the Public Utility Commission of Oregon (“Staff”) in the Energy Resources and Planning Division.

2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in this docket as follows: Staff/1100 (Opening Testimony), Staff/1101 (Witness Qualification Statement) and Staff/2900 (Rebuttal Testimony).

3. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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

SIGNED this 16 day of September, 2020 at Portland, Oregon.

Signed: /s/ Max St. Brown
Max St. Brown

**BEFORE THE PUBLIC UTILITY COMMISSION
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In the Matter of

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DECLARATION OF PAUL ROSSOW

I, Paul Rossow, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Paul Rossow. I am a Utility Analyst for the Public Utility Commission of Oregon (“Staff”) in the Energy Resources and Planning Division.

2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in this docket as follows: Staff/1200 (Opening Testimony), Staff/1201 (Witness Qualification Statement) and Staff/2800 (Rebuttal Testimony).

3. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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

SIGNED this 16th day of September, 2020 at Salem, Oregon.

Signed: /s/ Paul Rossow
Paul Rossow

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DECLARATION OF
NADINE HANHAN

8 I, Nadine Hanhan, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Nadine Hanhan. I am a Senior Utility Analyst for the Public Utility
10 Commission of Oregon ("Staff") in the Energy Resources and Planning Division.

11 2. On behalf of Staff, I co-drafted pre-filed testimony and exhibits submitted for use in
12 this docket as follows: Staff/1400 (Opening Testimony), Staff/1401 (Witness Qualification
13 Statement) and Staff/2100 (Rebuttal Testimony).

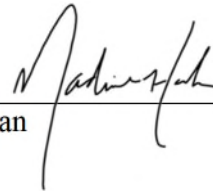
14 3. To the best of my knowledge, my pre-filed testimony and my witness qualification
15 statement are true and accurate.

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

19
20 SIGNED this 16th day of September, 2020 at Happy Valley, Oregon.

21
22 Signed: _____

23 Nadine Hanhan



**BEFORE THE PUBLIC UTILITY COMMISSION
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In the Matter of

PACIFICORP, dba PACIFIC POWER,

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DECLARATION OF ROSE ANDERSON

I, Rose Anderson, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Rose Anderson. I am a Senior Economist for the Public Utility Commission of Oregon (“Staff”) in the Energy Resources and Planning Division.

2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in this docket as follows: Staff/1500 (Opening Testimony), Staff/1501 (Witness Qualification Statement) and Staff/2200 (Rebuttal Testimony).

3. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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

SIGNED this 16th day of September, 2020 at Salem, Oregon.

Signed: /s/ Rose Anderson
Rose Anderson

**BEFORE THE PUBLIC UTILITY COMMISSION
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In the Matter of

PACIFICORP, dba PACIFIC POWER,

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DECLARATION OF KATHY ZARATE

I, Kathy Zarate, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Kathy Zarate. I am a Utility Economist for the Public Utility Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in this docket as follows: Staff/1600 (Opening Testimony) and Staff/1601 (Witness Qualification Statement).

3. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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

SIGNED this 16 day of September, 2020 at Salem, Oregon.

Signed: /s/ Kathy Zarate
Kathy Zarate

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DECLARATION OF
MOYA ENRIGHT

8 I, Moya Enright, declare under penalty of perjury under the laws of the State of Oregon:

9 1. My name is Moya Enright. I am a Senior Economist at the Public Utility
10 Commission of Oregon in the Energy Rates, Finance and Audit Division.

11 2. On behalf of Staff, I co-drafted pre-filed testimony and exhibits submitted for use in
12 this docket as follows: Staff/200, Staff/202 (Witness Qualification Statement) and supporting
13 Exhibits Staff/203-210.

14 3. To the best of my knowledge, my pre-filed testimony and my witness qualification
15 statement are true and accurate.

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

19
20 SIGNED this 17 day of September, 2020 at Salem, Oregon.

21
22 Signed: /s/ Moya Enright
23 Moya Enright

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

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In the Matter of

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DECLARATION OF SCOTT GIBBENS

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

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

2. On behalf of Staff, I drafted pre-filed testimony and exhibits submitted for use in this docket as follows: Staff/1300 (Opening Testimony), Staff/1301 (Witness Qualification Statement) and Staff/2400 (Rebuttal Testimony).

3. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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

SIGNED this 16th day of September, 2020 at Salem, Oregon.

Signed: Scott Gibbens
Scott Gibbens

**BEFORE THE PUBLIC UTILITY COMMISSION
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In the Matter of

PACIFICORP, dba PACIFIC POWER,

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DECLARATION OF YASSIR RASHID

I, Yassir Rashid, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Yassir Rashid. I am a Senior Utility Analyst for the Public Utility Commission of Oregon (“Staff”) in the Safety, Reliability and Security Division.

2. On behalf of Staff, I co-drafted pre-filed testimony and exhibits submitted for use in this docket as follows: Staff/1400 (Opening Testimony), Staff/1402 (Witness Qualification Statement) and Staff/2100 (Rebuttal Testimony).

3. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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

SIGNED this 16th day of September, 2020 at Albany, Oregon.

Signed: /s/ Yassir Rashid
Yassir Rashid

**BEFORE THE PUBLIC UTILITY COMMISSION
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DECLARATION OF CURTIS DLOUHY

I, Curtis Dlouhy, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Curtis Dlouhy. I am a Senior Economist for the Public Utility Commission of Oregon (“Staff”) in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I co-drafted pre-filed testimony and exhibits submitted for use in this docket as follows: Staff/1901 (Witness Qualification Statement), Staff/1902 (**(CONFIDENTIAL)** Cost of LT Debt), Staff/1903 (ROE Peer Screen), Staff/1904 (Three-Stage DCF ROE Modeling), Staff/1905 (CAPM ROE Control Modeling), Staff/1906 (Gordon Growth Single Stage DCF ROE Control Modeling), Staff/1908 (BEA Historic GDP Growth), Staff/1909 (TIPS Implied Inflation Expectations), and Staff/1900 (Rebuttal Testimony).

3. To the best of my knowledge, my pre-filed testimony and my witness qualification statement are true and accurate.

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

SIGNED this 16th day of September, 2020 at Salem, Oregon.

Signed: /s/ CurtisDlouhy
Curtis Dlouhy