

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 375

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

2021 Transition Adjustment Mechanism

SIERRA CLUB'S MOTION TO ADMIT
TESTIMONY AND EXHIBITS

Sierra Club hereby moves to admit the following pre-filed testimony and exhibits.

Attached in support of this motion is the signed declaration of Ed Burgess attesting to the truth and accuracy of his pre-filed testimony and exhibits.

Exhibit No.	Description
Sierra Club/101	Highly Confidential Opening Testimony of Ed Burgess
Sierra Club/101	Curriculum Vitae of Ed Burgess
Sierra Club/102	Jeremy Fisher et al., <i>Playing with Other People's Money: How Non-Economic Coal Operations Distort Energy Markets</i>
Sierra Club/103	Southwest Power Pool, <i>Self-committing in SPP Markets: Overview, Impacts, and Recommendations</i>
Sierra Club/104	Rebuttal Testimony of Michael Wilding in A.19-08-002 (Cal. Pub. Util. Comm'n) (provided as an attachment to PacifiCorp Response to Sierra Club Data Request 2.1)
Sierra Club/105	Public Discovery Responses
Sierra Club/106	PacifiCorp 2019 Integrated Resource Plan (Excerpt)
Sierra Club/107	Confidential Attachment to Sierra Club Data Request 1.6
Sierra Club/108	Confidential Sierra Club Coal Supply Agreements Workpaper
Sierra Club/109	Confidential Attachment to Sierra Club Data Request 1.7
Sierra Club/110	Highly Confidential PacifiCorp Response to Sierra Club Data Request 4.1
Sierra Club/111	Complied Selected Confidential Data Responses
Sierra Club/112	PacifiCorp Confidential Long-Term Fuel Supply Plan for Jim Bridger Plan (Redacted Version)
Sierra Club/113	Confidential Attachment 1.27-3 to PacifiCorp Response to Sierra Club Data Request 1.27
Sierra Club/114	Confidential Attachment 1.10-1 to PacifiCorp Response to Sierra Club Data Request 1.10
Sierra Club/115	Union of Concerned Scientists Panel on Self-Committed Coal in Power Markets

Stipulating Parties/100	Joint Testimony of Stipulating Parties
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Dated: October 27, 2020

Respectfully submitted,

/s/

Rose Monahan
Associate Attorney (*pro hac vice*)
Gloria Smith (*pro hac vice*)
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DECLARATION OF ED BURGESS

I, Ed Burgess, declare as follows:

1. My name is Ed Burgess. I am a Senior Director at Strategen Consulting. My work address is 2150 Allston Way, Suite 400, Berkeley, California 94703.
2. I am the same Edward Burgess that previously filed testimony and exhibits on behalf of the Sierra Club in this matter (Sierra Club/100-115, Stipulating Parties/100).
3. My pre-filed testimony and exhibits are true and accurate. If I were asked the same questions under oath today, my answers would be the same.

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.

Executed this 26th day of October 2020 at El Cerrito, California.



Ed Burgess