

# Davison Van Cleve PC

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September 8, 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,  
2021 Annual Power Cost Update Tariff.  
**Docket No. UE 377**

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 docket.

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 377**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) MOTION TO ADMIT PRE-FILED  
COMPANY, ) TESTIMONY AND EXHIBITS OF THE  
 ) ALLIANCE OF WESTERN ENERGY  
 ) CONSUMERS  
2021 Annual Power Cost Update Tariff. )  
\_\_\_\_\_ )

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>
Confidential AWEC/100	Confidential Opening Testimony of Dr. Lance D. Kaufman
AWEC/101	Curriculum Vitae of Dr. Lance D. Kaufman
Confidential AWEC/102	Confidential PGE Responses to Data Requests
AWEC/200	Supplemental Opening Testimony of Dr. Lance D. Kaufman
AWEC/201	PGE First Supplemental Response to AWEC Data Request 31

The Declaration of Lance D. Kaufman attesting to the truth and accuracy of his testimony and exhibit filings is attached.

Dated this 8th day of September, 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 377**

In the Matter of	)	
	)	DECLARATION OF
PORTLAND GENERAL ELECTRIC	)	LANCE D. KAUFMAN
COMPANY,	)	
	)	
2021 Annual Power Cost Update Tariff.	)	
_____	)	

I, LANCE D. KAUFMAN, state the following, under penalty of perjury under the laws of the State of Oregon:

1. My name is Lance D. Kaufman. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers (“AWEC”) in this matter.
2. On behalf of AWEC, I sponsored pre-filed joint testimony and exhibits in this proceeding (AWEC/100-102, AWEC/200-201, and Stipulating Parties/100-101).
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.

SIGNED this 8th day of September, 2020.

  
\_\_\_\_\_  
LANCE D. KAUFMAN