

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
Suite 450

1750 SW Harbor Way  
Portland, OR 97201

February 8, 2022

## *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,  
Request for a General Rate Revision.  
**Docket No. UE 394**

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Motion to Admit Pre-filed Testimony and Exhibits 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



<u>Exhibit</u>	<u>Description</u>
AWEC/106	Summary of Amounts Included in UM 2115 Wildfire Deferral and UM 2156 Storm Deferral
AWEC/107	Article Regarding PGE 2020 Trading Losses
Confidential AWEC/108	2020 Trading Margins Balance
Revised Confidential AWEC/200	Confidential Opening Testimony of Dr. Lance D. Kaufman
AWEC/201	Qualification Statement of Dr. Lance D. Kaufman
AWEC/201	PGE Responses to Data Requests
AWEC/203	Load Forecast Adjustments
AWEC/204	World Trade Center Adjustment
AWEC/205	Marginal Cost Adjustments
AWEC/206	NV Energy's Large Customer Market Price Energy Tariff
AWEC/207	NARUC Guidelines for Cost Allocations and Affiliate Transactions
Confidential AWEC/300	Confidential Rebuttal Testimony of Bradley G. Mullins

<u>Exhibit</u>	<u>Description</u>
AWEC/301	Updated Boardman Deferral Balance Calculation
Confidential AWEC/302	Trojan NDT Email Correspondence
AWEC/303	Storm Cost Analysis Including 1995-1996 Ice Storm
Confidential AWEC/400	Confidential Rebuttal Testimony of Dr. Lance D. Kaufman
Confidential AWEC/401	Responses to Data Requests
AWEC/402	Marginal Cost and Rate Spread
AWEC/403	Between Rate Case Rate Impacts by Schedule
AWEC-CUB/100	Joint Opening Boardman Deferral Testimony of Bradley G. Mullins and William Gehrke
AWEC-CUB/101	PGE Response to AWEC Data Request No. 32
AWEC-CUB/102	Boardman Deferral Calculations

The Affidavits of Bradley G. Mullins and Dr. Lance D. Kaufman attesting to the truth and accuracy of their testimony and exhibit filings, as well as their testimony in support of the stipulation filed in this proceeding, are attached.

Dated this 8<sup>th</sup> day of February, 2022.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Corinne O. Milinovich

Corinne O. Milinovich

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

com@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 394**

In the Matter of	)	
	)	DECLARATION OF
Portland General Electric Company,	)	BRADLEY G. MULLINS
	)	
Request for a General Rate Revision.	)	
	)	
_____	)	

I, BRADLEY G. MULLINS, state the following, under penalty of perjury under the laws of 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. On behalf of AWEC, I sponsored testimony and exhibits in this proceeding (AWEC/100-108, AWEC/300-303, AWEC-CUB/100-102, Stipulating Parties/100-101, Stipulating Parties/200-203, and Stipulating Parties/300-303).

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

SIGNED this 8 day of February, 2022.

  
\_\_\_\_\_  
BRADLEY G. MULLINS

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 394**

In the Matter of	)	
	)	DECLARATION OF
Portland General Electric Company,	)	LANCE D. KAUFMAN
	)	
Request for a General Rate Revision.	)	
_____	)	

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 testimony and exhibits in this proceeding (AWEC/200-207 and AWEC/400-403).
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 7 day of February, 2022.

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