# Davison Van Cleve PC

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September 16, 2022

### Via Electronic Filing

Public Utility Commission of Oregon Attn: Filing Center 201 High St. SE, Suite 100 Salem OR 97301

> In the Matter of PACIFICORP, dba PACIFIC POWER, Re: 2023 Transition Adjustment Mechanism. Docket No. UE 400

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

# **BEFORE THE PUBLIC UTILITY COMMISSION**

# **OF OREGON**

#### **UE 400**

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In the Matter of PACIFICORP, dba PACIFIC POWER, 2023 Transition Adjustment Mechanism.

MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS OF THE ALLIANCE OF WESTERN ENERGY CONSUMERS

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>	Description	
AWEC/100	Opening Testimony of Bradley G. Mullins	
AWEC/101	Qualification Statement of Bradley G. Mullins	
Confidential AWEC/102	PacifiCorp Responses to Discovery Requests	
AWEC/103	Production Tax Credit Forecast for 2023	
AWEC/104	PGE Production Tax Credit Forecast for 2023	
AWEC/105	Utah Schedule 34	

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<u>Exhibit</u>	Description
AWEC/106	Market Cap Analysis
AWEC/107	PSCo Contract Evaluation

The Affidavit of Bradley G. Mullins attesting to the truth and accuracy of his

testimony and exhibit filings, as well as his testimony in support of the stipulation filed in this

proceeding, is attached.

Dated this 16th day of September, 2022.

Respectfully submitted,

### DAVISON VAN CLEVE, P.C.

/s/ Brent L. Coleman

Brent L. Coleman 1750 SW Harbor Way, Suite 450 Portland, Oregon 97201 (503) 241-7242 (phone) (503) 241-8160 (facsimile) blc@dvclaw.com Of Attorneys for the Alliance of Western Energy Consumers

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### **BEFORE THE PUBLIC UTILITY COMMISSION**

#### **OF OREGON**

#### **UE 400**

In the Matter of	)	
	)	DECLARATION OF
PACIFICORP, dba PACIFIC POWER,	)	BRADLEY G. MULLINS
	)	
2023 Transition Adjustment Mechanism.	)	
	)	

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/100-107 and Stipulating Parties/100).

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 16th day of September, 2022.

BRADLEY G. MULLINS