BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

Docket No. UE 416

PORTLAND GENERAL ELECTRIC COMPANY,

Request for a General Rate Revision.

MOTION REGARDING LATE-FILED OPENING TESTIMONY OF THE NATURAL RESOURCES DEFENSE COUNCIL AND NW ENERGY COALITION

Pursuant to OAR 860-001-0420, the Natural Resource Defense Council ("NRDC") and NW Energy Coalition ("NWEC," together "NRDC/NWEC") hereby move the Commission accept NRDC/NWEC's late-filed Opening Testimony in the above referenced docket.

NRDC/NWEC made a good faith effort to confer and seek agreement with other parties in this docket, as required by OAR 860-001-0420(2). As of the filing of this Motion, no party has objected to this Motion and most have indicated they have no objection.

The Opening Testimony of Ralph Cavanagh on behalf of NRDC/NWEC was believed to have been appropriately filed prior to the deadline of 3:00pm on June 13, 2023. At 12:20pm on June 13, 2023, Shari Walker, the Western Region Administrator for NRDC, emailed all parties, with the exception of PUC Staff, and attached Cavanagh's Opening Testimony. Ms. Walker believed to have followed the appropriate procedures for making the filing. However, Ms. Walker mistakenly failed to include the Oregon Public Utility Commission (PUC) Filing Center as a recipient of the email. It is believed that Ms. Walker overlooked the PUC Filing Center email address – puc.filingcenter@puc.oregon.gov – because it is similar to PGE's email address for PUC filings – pge.opuc.filings@pgn.com – which was included as the first recipient in her email.

Aside from perhaps PUC Staff, no other parties in the proceeding will be prejudiced by this late filing. All other parties directly received the testimony in the email from Ms. Walker on June 13, 2023. Furthermore, the testimony of Mr. Cavanagh is narrowly focused, supporting a proposal made by PGE. The testimony is only twenty-four (24) pages long and contains no additional substantive exhibits. No changes have been made to the testimony between June 13, 2023 and the present.

WHEREFORE, NRDC/NWEC respectfully requests the Commission accept this Motion and the late filing of NRDC/NWEC's Opening Testimony.

DATED this 23rd day of June, 2023.

Respectfully submitted,

/s/ F. Diego Rivas

F. Diego Rivas, appearing *Pro Hac Vice* Regulatory Counsel
NW Energy Coalition
1101 8th Ave
Helena, MT 59601
(406) 461-6632
diego@nwenergy.org