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August 24, 2023

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 416

Dear Filing Center:

Please find enclosed the corrected Motion to Admit NVPC Testimony and Exhibits on behalf of the Alliance of Western Energy Consumers (“AWEC”) in the above-referenced docket.

Please note that AWEC’s original Motion to Admit NVPC Testimony and Exhibits, filed on August 23, 2023, inadvertently omitted AWEC Cross-Examination Exhibits 500 – 503. AWEC’s revised filing corrects the error, with changes shown in redline.

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 416

In the Matter of Portland General Electric Company, Request for a General Rate Revision. <hr style="border: 0.5px solid black; margin-top: 10px;"/>))))))	MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS OF THE ALLIANCE OF WESTERN ENERGY CONSUMERS
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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>
AWEC/100	Opening NVPC Testimony of Bradley G. Mullins
AWEC/101	Qualification Statement of Bradley G. Mullins
AWEC/102	PGE Responses to Data Requests
AWEC/103	PowerEx Mid-Columbia WSP Product Definitions
AWEC/104	Production Tax Credit Rate Forecast for 2024
Confidential AWEC/105	Beaver Cycling History

<u>Exhibit</u>	<u>Description</u>
AWEC/106	Oregonian Articles Discussing Biglow Turbine Failures
AWEC/400	Rebuttal NVPC Testimony of Bradley G. Mullins
<u>AWEC/500</u>	<u>CAISO Business Practice Manual for the Western Energy Imbalance Market (July 27, 2023)</u>
<u>AWEC/501</u>	<u>PGE EIM Benefit Workpaper (Feb. 15, 2023)</u>
<u>AWEC/502</u>	<u>Excerpt of PacifiCorp's 2021 Washington Integrated Resource Plan Two-Year Progress Report (Mar. 31, 2023)</u>
<u>AWEC/503</u>	<u>CAISO Fifth Replacement Electronic Tariff, Section 29: Energy Imbalance Market (July 1, 2023)</u>

The Declaration of Bradley G. Mullins attesting to the truth and accuracy of his testimony and exhibit filings, including his testimony in support of the stipulations filed in this proceeding, is attached.

Dated this 23rd day of August, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Brent L. Coleman

Brent L. Coleman

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Of Attorneys for the

Alliance of Western Energy Consumers

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 416

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 Net Variable Power Cost testimony and exhibits in this proceeding (AWEC/100-106, AWEC/400, Stipulating Parties/100-102, and Stipulating Parties/200-202).
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 23rd day of August, 2023.

Bradley G. Mullins

BRADLEY G. MULLINS