BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON UE 416

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY

Request for 2024 General Rate Revision

MOTION TO ADMIT TESTIMONY AND EXHIBITS OF NATURAL RESOURCES DEFENSE COUNCIL AND NW ENERGY COALITION

The Natural Resources Defense Council (NRDC) and NW Energy Coalition (NWEC) move for admission of the following testimony and exhibits into the record in the above captioned proceeding.

Exhibit No.	Description
NRDC-NWEC 100	Opening Testimony of Ralph Cavanagh and Lauren McCloy
NRDC-NWEC 101	Curriculum Vitae of Ralph Cavanagh and Lauren McCloy
NRDC-NWEC 200	Rebuttal Testimony of Ralph Cavanagh and Lauren McCloy

The testimony of Mr. Cavanagh and Ms. McCloy are supported by declarations of the witnesses attesting that their pre-filed testimony and exhibits are true and correct.

DATED this 16th day of October 2023.

Respectfully submitted,

F. Diego Rivas, appearing pro hac vice

Regulatory Counsel NW Energy Coalition

1101 8th Ave Helena, MT 59601

(406) 461-6632

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON UE 416

In the Matter of

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DECLARATION OF RALPH CAVANAGH

- I, Ralph Cavanagh, declare under penalty of perjury under the laws of the State of Oregon:
 - My full name is Ralph Cavanagh. My position is Energy Co-Director for the Natural Resources Defense Council.
 - On behalf of the Natural Resources Defense Council and the NW Energy Coalition, I
 sponsored opening testimony and rebuttal testimony on the issue of revenue decoupling,
 NRDC-NWEC/100 and NRDC-NWEC/200. I also sponsored supporting exhibit NRDCNWEC/101.
 - 3. To the best of my knowledge and belief, the testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

DATED this 16th day of October 2023.

Respectfully submitted,

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Ralph Cavanagh

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON UE 416

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DECLARATION OF LAUREN MCCLOY

- I, Lauren McCloy, declare under penalty of perjury under the laws of the State of Oregon:
 - My full name is Lauren McCloy. My position is Policy Director for the NW Energy Coalition.
 - On behalf of the Natural Resources Defense Council and the NW Energy Coalition, I
 sponsored opening testimony and rebuttal testimony on the issue of revenue decoupling,
 NRDC-NWEC/100 and NRDC-NWEC/200. I also sponsored supporting exhibit NRDCNWEC/101.
 - 3. To the best of my knowledge and belief, the testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

DATED this 16th day of October 2023.

Respectfully submitted,

Lauren McCloy