BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 420

3 UE 420

4 In the Matter of

STAFF MOTION TO ADMIT TESTIMONY

⁵ PACIFICORP, dba PACIFIC POWER,

6 2024 Transition Adjustment Mechanism.

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8 Staff of the Oregon Public Utility Commission moves the Administrative Law Judge to

9 admit the following Staff exhibits into the record in the above-captioned proceeding.

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1.1	Exhibit No.	Description
11	Staff 100	Opening testimony of Anna Kim
12	Staff 101	Witness Qualifications Statement of Anna Kim
	Staff 102	PacifiCorp responses to Staff data requests
13	Staff 200	Opening Testimony of Julie Jent
13	Staff 201	Witness Qualifications Statement of Julie Jent
14	Staff 202	PacifiCorp responses to Staff data requests
1.	Staff 203	Confidential PacifiCorp responses to Staff data requests
15	Staff 300	Opening Testimony of Curtis Dlouhy
	Staff 301	Witness Qualifications Statement of Curtis Dlouhy
16	Staff 302	PacifiCorp responses to Staff Data Requests
	Staff 303	Market Cap Methodology Comparison
17	Staff 304	Western EIM Benefits and Benefits Methodology
	Staff 400	Opening Testimony of Rose Anderson
18	Staff 401	Witness Qualifications Statement of Rose Anderson
	Staff 402	Confidential exhibit in support of testimony
19	Staff 500	Opening Testimony of Madison Bolton
20	Staff 501	Witness Qualifications Statement of Madison Bolton
20	Staff 502	PacifiCorp's Reply to Staff Data Request No. 76
21	Staff 600	Opening Testimony of Itayi Chipanera
21	Staff 601	Witness Qualifications Statement of Itayi Chipanera
22	Staff 700	Rebuttal Testimony of Anna Kim
22	Staff 701	Coal-fired Thermal Report
23	Staff 800	Rebuttal Testimony of Julie Jent
23	Staff 900	Rebuttal Testimony of Curtis Dlouhy
24	Staff 1000	Rebuttal Testimony of Rose Anderson
	Staff 1001	Highly Confidential exhibit in support of testimony
25	Staff 1100	Rebuttal Testimony of Madison Bolton
	Staff 1200	Rebuttal Testimony of Itayi Chipanera

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Page 1 - UE 420 – STAFF MOTION TO ADMIT TESTIMONY SSA/pjr

1	Declarations attesting to the truthfulness of the Staff testimony are attached to this	
2	motion.	
3	DATED this 5 th day of September 2023.	
4	Respectfully submitted,	
5	ELLEN F. ROSENBLUM Attorney General	
6	/s/ Stephanie Andrus	
7		
8	Stephanie Andrus, OSB No. 925123 Sr. Assistant Attorney General Of Attorneys for Staff of the Public Utility	
9	Commission of Oregon	
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Page	2 - UE 420 – STAFF CROSS-EXAMINATION STATEMENT	

Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 947-4520 / Fax: (503) 378-3784

SSA/pjr

1		CUTILITY COMMISSION PREGON	
2	UE 420		
3	In the Matter of		
5	PACIFICORP, dba PACIFIC POWER,	DECLARATION OF ANNA KIM	
6	2024 Transition Adjustment Mechanism.		
7	I, ANNA KIM, state the following, under pena	lty of perjury in the State of Oregon:	
8	1. I am the Energy Costs Section N	Manager employed in the Rates, Safety and Utility	
9	Performance Division of the Oregon Public Ut	ility Commission.	
10	2. On behalf of Staff of the Public	Utility Commission, I sponsored testimony for the	
11	above-captioned docket pre-filed as Staff Exhibits 100 and 700 and drafted a witness		
12	qualifications statement, pre-filed as Staff Exh	bit 101.	
13	To the best of my knowledge, the pre-fi	iled testimony in Staff Exhibits 100 and 700 and	
14	my witness qualifications statement in Staff Ex	chibit 101 are true and accurate.	
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16 17	•	t is true to the best of my knowledge and or use as evidence in court and is subject to	
18	penalty for perjury.		
19	SIGNED this 5 th day of September, 202	23.	
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21		Aura Kim	
22		Anna Kim ANNA KIM	
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1		UTILITY COMMISSION REGON	
2		E 420	
3	In the Matter of		
4 5	PACIFICORP, dba PACIFIC POWER,	DECLARATION OF JULIE JENT	
6	2024 Transition Adjustment Mechanism.		
7	I, JULIE JENT, state the following, under pena	lty of perjury in the State of Oregon:	
8	1. I am a Senior Utility Analyst in	the Energy Costs Section of the Rates, Safety and	
9	Utility Performance Division of the Oregon Pu	blic Utility Commission.	
10	2. On behalf of Staff of the Public	Utility Commission, I sponsored testimony for the	
11	above-captioned docket pre-filed as Staff Exhibits 200 and 800 and drafted a witness		
12	qualifications statement, pre-filed as Staff Exhibit 201.		
13	To the best of my knowledge, the pre-fi	led testimony in Staff Exhibits 200 and 800 and	
14	my witness qualifications statement in Staff Ex	hibit 201 are true and accurate.	
15			
16 17	•	t is true to the best of my knowledge and or use as evidence in court and is subject to	
18	ry ryy -		
19	SIGNED this 5 th day of September, 202	3.	
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21		Qulie Gent	
22		LIE JENT	
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1		UTILITY COMMISSION REGON	
2		E 420	
3	In the Matter of		
4 5	PACIFICORP, dba PACIFIC POWER,	DECLARATION OF CURTIS DLOUHY	
6	2024 Transition Adjustment Mechanism.		
7	I, CURTIS DLOUHY, state the following, under	er penalty of perjury in the State of Oregon:	
8	1. I am an Economist within the St	rategy and Integration (SI) Division of the	
9	Oregon Public Utility Commission.		
10	2. On behalf of Staff of the Public	Utility Commission, I sponsored testimony for the	
11	above-captioned docket pre-filed as Staff Exhibits 300 and 900 and drafted a witness		
12	qualifications statement, pre-filed as Staff Exhibit 301.		
13	To the best of my knowledge, the pre-filed testimony in Staff Exhibits 300 and 900 and		
14	my witness qualifications statement in Staff Ex	hibit 301 are true and accurate.	
15			
16 17	I hereby declare that the above statement belief, and that I understand it is made for penalty for perjury.	t is true to the best of my knowledge and or use as evidence in court and is subject to	
18	penalty for perjury.		
19	SIGNED this 5 th day of September, 202	3.	
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21		Curtis Dlouby	
22	-	Curtis Dlouhy CURTIS DLOUHY	
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Page 1 - UE 420 – DECLARATION OF CURTIS DLOUHY

1		CUTILITY COMMISSION OREGON	
2	UE 420		
3	In the Matter of		
4 5	PACIFICORP, dba PACIFIC POWER,	DECLARATION OF ROSE ANDERSON	
6	2024 Transition Adjustment Mechanism.		
7	I, ROSE ANDERSON, state the following, und	der penalty of perjury in the State of Oregon:	
8	1. I am a Senior Economist employ	yed in the Rates, Safety and Utility Performance	
9	Division of the Oregon Public Utility Commiss	sion.	
10	2. On behalf of Staff of the Public	Utility Commission, I sponsored testimony for the	
11	above-captioned docket pre-filed as Staff Exhibits 400 and 1000 and drafted a witness		
12	qualifications statement, pre-filed as Staff Exhibit 401.		
13	To the best of my knowledge, the pre-filed testimony in Staff Exhibits 400 and 1000, as		
14	corrected by an errata filed on August 31, 2022, and my witness qualifications statement in Staff		
15	Exhibit 401 are true and accurate.		
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17	· · · · · · · · · · · · · · · · · · ·	t is true to the best of my knowledge and or use as evidence in court and is subject to	
18	penalty for perjury.	·	
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20	SIGNED this 5 th day of September, 202	23.	
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22		Rose Anderson	
23		ROSE ANDERSON	
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON		
2	UE 420		
3	In the Matter of		
5	PACIFICORP, dba PACIFIC POWER, DECLARATION OF MADISON BOLTON		
6	2024 Transition Adjustment Mechanism.		
7	I, MADISON BOLTON, state the following, under penalty of perjury in the State of Oregon:		
8	1. I am a Senior Energy and Policy Analyst in the Strategy and Integration Division		
9	of the Oregon Public Utility Commission.		
10	2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the		
11	above-captioned docket pre-filed as Staff Exhibits 500 and 1100 and drafted a witness		
12	qualifications statement, pre-filed as Staff Exhibit 501.		
13	To the best of my knowledge, the pre-filed testimony in Staff Exhibits 500 and 1100 and		
14	my witness qualifications statement in Staff Exhibit 501 are true and accurate.		
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16 17	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.		
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19	SIGNED this 5 th day of September, 2023.		
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21	Madison Bolton		
22	MADISON BOLTON		
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1		CUTILITY COMMISSION OREGON	
2	U	E 420	
3	In the Matter of		
5	PACIFICORP, dba PACIFIC POWER,	DECLARATION OF ITAYI CHIPANERA	
6	2024 Transition Adjustment Mechanism.		
7	I, ITAYI CHIPANERA, state the following, ur	nder penalty of perjury in the State of Oregon:	
8	1. I am a Senior Financial Analyst	in the Accounting and Finance Section of the	
9	Rates, Safety, and Utility Performance Division	n of the Oregon Public Utility Commission.	
10	2. On behalf of Staff of the Public	Utility Commission, I sponsored testimony for the	
11	above-captioned docket pre-filed as Staff Exhibits 600 and 1200 and drafted a witness		
12	qualifications statement, pre-filed as Staff Exhibit 601.		
13	To the best of my knowledge, the pre-filed testimony in Staff Exhibits 600 and 1200 and		
14	my witness qualifications statement in Staff Ex	chibit 601 are true and accurate.	
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16 17	•	t is true to the best of my knowledge and or use as evidence in court and is subject to	
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19	SIGNED this 5 th day of September, 202	23.	
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21		Stayi Chipanera ITAYI CHIPANERA	
22		ITA#I CHIPANERA	
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