BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 420

In the Matter of PACIFICORP d/b/a PACIFIC POWER, 2024 Transition Adjustment Mechanism	SIERRA CLUB'S MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS AND EXCUSE WITNESSES FROM HEARING

In accordance with Administrative Law Judge Mapes' August 3, 2023 memorandum, Sierra Club hereby moves to admit the following pre-filed testimony and exhibits into the evidentiary record in this proceeding. Attached in support of this motion are the signed declarations of Ed Burgess and Maria Roumpani attesting to the truth and accuracy of their pre-filed testimony and exhibits.

In light of the Cross-Examination Statements filed on September 1, 2023, Sierra Club respectfully requests that witnesses Ed Burgess and Maria Roumpani be excused from hearing, unless the ALJ or Commissioners have questions for these witnesses. Sierra Club plans to virtually attend the hearings scheduled for September 7 and 8 and be represented at hearing by Rose Monahan.

Sierra Club Pre-Filed Exhibits

Witnesses: Ed Burgess and Maria Roumpani

Exhibit No.	Description
Sierra Club/100	Highly Confidential Opening Testimony of Maria Roumpani and Ed Burgess
Sierra Club/101	Curriculum Vitae of Ed Burgess
Sierra Club/102	Curriculum Vitae of Maria Roumpani
Sierra Club/103	Public PacifiCorp Data Request Responses in UE 420
Sierra Club/104	Confidential Data Request Responses in UE 420
Sierra Club/105	Highly Confidential Data Request Responses in UE 420

Exhibit No.	Description
Sierra Club/106	Public Data Request Responses from Docket No. A.21-08-004 (Cal. Pub. Utils. Comm'n)
Sierra Club/107	Highly Confidential Jim Bridger 2023 Long-Term Fuel Supply Plan
Sierra Club/108	Public Jim Bridger 2023 Long-Term Fuel Supply Plan

Witness: Ed Burgess

Sierra Club/200	High Confidential Rebuttal Testimony of Ed Burgess
Sierra Club/201	PacifiCorp Response to Sierra Club Data Request 5.2

Dated: September 1, 2023   Respectfully submitted,

/s/ Rose Monahan

Rose Monahan (*pro hac vice*)
Joshua Smith
Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
Telephone: (415) 977-5560
rose.monahan@sierraclub.org
joshua.smith@sierraclub.org

In the Matter of	
PACIFICORP d/b/a PACIFIC POWER,	DECLARATION OF ED BURGESS
2024 Transition Adjustment Mechanism	

I, Ed Burgess, declare as follows:

1.   My name is Ed Burgess. I am a Senior Director at Strategen Consulting. My work address is 10265 Rockingham Drive, Suite 100-4061, Sacramento, California 95827.

2.   I am the same Ed Burgess that previously filed testimony and exhibits on behalf of Sierra Club in this matter (Sierra Club/100-108 and Sierra Club/200-201).

3.   My pre-filed testimony and exhibits are true and accurate. If I were asked the same questions under oath today, my answers would be the same.

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.

Executed this ____1____ day of September 2023 at _____Sacramento, CA_____

Edward A Burgess
_____
Ed Burgess

In the Matter of PACIFICORP d/b/a PACIFIC POWER, 2024 Transition Adjustment Mechanism	DECLARATION OF MARIA ROUMPANI

I, Maria Roumpani, declare as follows:

1.   My name is Maria Roumpani. I am a Technical Director at Strategen Consulting. My work address is 10265 Rockingham Drive, Suite 100-4061, Sacramento, California 95827.

2.   I am the same Maria Roumpani that previously filed testimony and exhibits on behalf of Sierra Club in this matter (Sierra Club/100-108).

3.   My pre-filed testimony and exhibits are true and accurate. If I were asked the same questions under oath today, my answers would be the same.

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.

Executed this ___1___ day of September 2023 at ___Sacramento, CA___

_____
Maria Roumpani