



Portland General Electric Company

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Kim S. Burton

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March 5, 2024

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: UE 427 RAAC (Clearwater) - Stipulation

Dear Filing Center:

On behalf of Portland General Electric Company, Staff of the Public Utility Commission of Oregon, and the Oregon Citizens' Utility Board, enclosed for filing in the above-captioned docket is the following:

- Motion to Admit Stipulation and Exhibits
- Joint Testimony and Exhibits to Support Stipulation
- Stipulation
- Declaration in Support of Testimony

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads 'KSB'.

Kim S. Burton
Assistant General Counsel III

KMB:ld

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 427**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Clearwater Wind
Project).

**MOTION TO ADMIT STIPULATION AND
EXHIBITS**

On February 15, 2024, Portland General Electric Company (PGE), Staff of the Public Utility Commission of Oregon (Staff), and the Oregon Citizens' Utility Board (CUB) (jointly, the “Stipulating Parties”) reached a settlement agreement on February 15, 2024.

Pursuant to OAR 860-001-0350(7), PGE, on behalf of the Stipulating Parties, moves to admit into the record the Stipulation, dated February 15, 2024. PGE also moves that the following testimony and exhibits be admitted into the record as evidence in this proceeding:

| Testimony and Exhibits | Witness(es) |
|-------------------------------|--|
| PGE/100 (filed 10/30/2023) | Mike Abel, Greg Batzler |
| PGE/101 (filed 10/30/2023) | Mike Abel, Greg Batzler |
| PGE/102 (filed 10/30/2023) | Mike Abel, Greg Batzler |
| Stipulating Parties/100 | Rawleigh White (OPUC), Bob Jenks (CUB), and Greg Batzler (PGE) |
| Stipulating Parties/101 | Rawleigh White (OPUC), Bob Jenks (CUB), and Greg Batzler (PGE) |
| Stipulating Parties/102 | Rawleigh White (OPUC), Bob Jenks (CUB), and Greg Batzler (PGE) |
| Staff/100 (filed 2/6/2024) | Rawleigh White (OPUC) |
| Staff/101 (filed 2/6/2024) | Rawleigh White (OPUC) |
| Staff/200 (filed 2/6/2024) | Curtis Dloughy (OPUC) |
| Staff/201 (filed 2/6/2024) | Curtis Dloughy (OPUC) |
| Staff/202 (filed 2/6/2024) | Curtis Dloughy (OPUC) |
| Staff/203 (filed 2/6/2024) | Curtis Dloughy (OPUC) |
| Staff/204 (filed 2/6/2024) | Curtis Dloughy (OPUC) |
| Staff/205 (filed 2/6/2024) | Curtis Dloughy (OPUC) |
| Staff/206 (filed 2/6/2024) | Curtis Dloughy (OPUC) |

| | |
|----------------------------|----------------------|
| Staff/207 (filed 2/6/2024) | Curtis Dlouhy (OPUC) |
| Staff/300 (filed 2/6/2024) | Anna Kim (OPUC) |
| Staff/301 (filed 2/6/2024) | Anna Kim (OPUC) |
| Staff/302 (filed 2/6/2024) | Anna Kim (OPUC) |

PGE hereby requests the Commission issue an order approving the Stipulation without modification. Stipulating Parties support this motion. Consistent with the terms of the Stipulation wherein the Stipulating Parties agreed to work to effectuate an April 1, 2024 price change, Parties request a Commission decision before the target implementation date of April 1, 2024.

DATED this 5th day of March, 2024.

Respectfully submitted,



Kim S. Burton
Assistant General Counsel III
PORTLAND GENERAL ELECTRIC COMPANY
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
Phone: 573.356.9688
Email: kim.burton@pgn.com

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

**UE 427
Renewable Resources Automatic Adjustment
Clause**

PORTLAND GENERAL ELECTRIC

**Joint Testimony in Support of the
Stipulation**

Direct Testimony of

Rawleigh White, OPUC

Bob Jenks, CUB

Greg Batzler, PGE

March 05, 2024

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I. Introduction

1 **Q. Please state your names and positions with your respective organizations.**

2 A. My name is Rawleigh White. I am a Senior Financial Analyst for the Public Utility
3 Commission of Oregon (OPUC) Staff. My qualifications appear in Staff Exhibit 100.

4 My name is Bob Jenks. I am the Executive Director of the Oregon Citizens' Utility Board (CUB).
5 My qualifications are provided as Stipulating Parties Exhibit 102.

6 My name is Greg Batzler. I am a Senior Regulatory Consultant for Portland General
7 Electric (PGE). My qualifications appear in PGE Exhibit 100.

8 **Q. What is the purpose of your testimony?**

9 A. Our purpose is to describe and support the Stipulation between OPUC Staff (Staff), CUB, and
10 PGE (collectively, the Stipulating Parties or Parties) reached in settlement conferences held
11 February 14, 2024, and February 15, 2024, which resolve all issues related to PGE's Docket
12 No. UE 427 Renewable Resources Automatic Adjustment Clause (RAC) filing. A copy of the
13 Stipulation is provided as Stipulating Parties Exhibit 101.

14 **Q. What is the basis for the Stipulation?**

15 A. PGE filed initial testimony on October 30, 2023, under Docket No. UE 427 (UE 427). Over
16 the following three months, Staff submitted, and PGE responded to 38 data requests. Staff
17 submitted opening testimony on February 6, 2024. The Parties held settlement discussions on
18 February 14 and 15, 2024. At the February 15 meeting, Parties reached an agreement that they
19 found reasonable for settlement and resolves all issues raised by parties in this docket.

20 **Q. Please summarize the issues resolved in the Stipulation.**

21 A. The Stipulation represents a global settlement of all issues in the docket, with the specific
22 terms included as follows:

**UE 427 Renewable Resources Automatic Adjustment Clause – Joint Testimony in Support
of Stipulation**

- 1 • Schedule 122 Tariff-Effective Date
- 2 • Treatment of Production Tax Credit (PTC) Carryforwards
- 3 • Forecast Capacity Factor
- 4 • Annual Performance Report
- 5 • Rate Spread/Rate Design

6 We explain the resolution of each of these issues below.

7 **Q. Are there any remaining issues not resolved through the Stipulation?**

8 A. No. The Stipulation settles all issues between all parties in UE 427.

II. Stipulated Issues

1 **Q. Please describe the Stipulation regarding Schedule 122 tariff-effective date.**

2 A. In initial testimony, PGE proposed a June 1, 2024 Schedule 122 tariff-effective date, which
3 was considered in the proposed and adopted procedural schedule that set a May 28, 2024
4 target date for a Commission decision. During settlement negotiations, and for the purposes
5 of providing a decrease to customer bills sooner, PGE proposed advancing the tariff effective
6 date to April 1, 2024. The Stipulating Parties agree to work to effectuate an April 1, 2024
7 price change for Schedule 122, which will be based upon a monthly forecast revenue
8 requirement provided as Attachment A to the Stipulation.

9 **Q. Please describe the Stipulation regarding PTCs.**

10 A. In opening testimony, PGE proposed removing the Clearwater-associated deferred tax asset
11 (DTA) from our forecast accumulated deferred income tax (ADIT) balance and selling the
12 generated PTCs through a property sales application.

13 **Q. How do Parties resolve this issue?**

14 A. The Stipulating Parties agree to either support or not oppose PGE's property sales application
15 made consistent with the terms of this stipulation, which will seek approval from the
16 Commission to sell the PTCs. Stipulating Parties recognize that customers are receiving the
17 full benefit of Clearwater PTCs as included in PGE's net variable power costs (NVPC)
18 included in Clearwater's revenue requirement. As such, the property sales application will
19 seek to recover the difference between the full value and the discounted sales value from
20 customers within PGE's property sales balancing account, so long as the difference is no
21 greater than 10% inclusive of costs and fees associated with the sale.

1 Additionally, PGE will not seek to defer any costs associated with running a request for
2 proposals for purposes of selling the PTCs.

3 **Q. Please describe the Stipulation regarding Clearwater’s capacity factor.**

4 A. In work papers provided with initial testimony PGE assumed an annual net capacity factor of
5 43.93% in MONET for calculating NVPC benefits in 2024. This annual net capacity factor
6 was based on Clearwater wind generation estimates from on-site meteorological data, coupled
7 with short-term transmission availability modeling that was reviewed and adjusted by a third-
8 party consultant.

9 Staff argued that PGE's methodology should reflect an assumption of 80% long-term firm
10 transmission, which is consistent with 2021 RFP threshold requirements. To address this, Staff
11 proposed using an assumption of 80% instead of the 77% firm transmission availability in the
12 determination of Clearwater’s forecast capacity factor for 2024. Additionally, Staff proposed
13 in testimony that for the first five years, Clearwater’s capacity factor used in the AUT forecast
14 be fixed at the proposed 43.99%.

15 **Q. Please describe the resolution of the capacity factor issues in the Stipulation.**

16 A. Stipulating Parties agree to reflect a capacity factor in MONET assuming 240 MW of firm
17 transmission, which represents 80% of Clearwater’s maximum generation and calculates a
18 capacity factor of 43.99%. Included in this assumption will be the costs associated with the
19 10 incremental MW of firm transmission rights needed to hold 240 MW.

20 Additionally, Stipulating Parties agree that for the first four years of forecasting
21 Clearwater’s capacity factor used in MONET (i.e., 2024 through 2027), the 5-year rolling
22 average capacity factor used in MONET will be capped at an average change of no higher

1 than 105% and no lower than 95% of the 2024 agreed upon factor of 43.99%. See Table 1
2 below for an illustration of this method.

Table 1

| | 2024 | 2025 | 2026 | 2027 | 2028 |
|--------|---|-------------|--------------|--------------|--------------|
| Year 1 | 43.99% | 43.99% | 2024 Actuals | 2024 Actuals | 2024 Actuals |
| Year 2 | 43.99% | 43.99% | 43.99% | 2025 Actuals | 2025 Actuals |
| Year 3 | 43.99% | 43.99% | 43.99% | 43.99% | 2026 Actuals |
| Year 4 | 43.99% | 43.99% | 43.99% | 43.99% | 43.99% |
| Year 5 | 43.99% | 43.99% | 43.99% | 43.99% | 43.99% |
| | 5 yr. Avg | 5 yr. Avg | 5 yr. Avg | 5 yr. Avg | 5 yr. Avg |
| | MONET Factor is within +/- 105% to 95% of 5 yr. avg | | | | 5 yr. Avg |

3 **Q. Please the Stipulation regarding annual performance reporting.**

4 A. The Stipulating Parties agree that PGE will provide an annual performance report as part of
5 its NVPC minimum filing requirements. The report will include: 1.) expected (i.e., RFP and
6 AUT) versus actual generation output, 2.) expected (i.e., RFP and AUT) versus realized
7 production tax credits, and 3.) RFP modeled NVPC vs. AUT forecasted NVPC. PGE will
8 provide reporting within its annual power cost update for ten years following the project's
9 online date (i.e., through 2033).

10 **Q. Please describe the Stipulation regarding rate spread.**

11 A. The Stipulating Parties agree that PGE will apply the rate spread methodology as proposed in
12 PGE Exhibit 100, which proposes the revenue requirement be spread in accordance with
13 Schedule 122, with costs allocated to each schedule based on an equal percentage of
14 generation revenue.

15 **Q. What is your recommendation to the Commission regarding the adjustments contained**
16 **in the Stipulation?**

17 A. The Stipulating Parties recommend and request that the Commission approve these
18 adjustments. Based on careful review of PGE and Staff's findings thorough discovery
19 conducted by parties in Docket No. 427, including 38 data requests; and thorough discussion

1 of the issues during the settlement conferences, we believe the proposed adjustments represent
2 appropriate and reasonable resolutions of the respective issues in this docket and results in fair
3 and reasonable rates.

4 **Q. Does this conclude your testimony?**

5 A. Yes.

List of Exhibits

Stipulating Parties Exhibit

Description

| | |
|-----|--------------------------|
| 101 | UE 427 Final Stipulation |
| 102 | CUB Qualifications |

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 427

In the Matters of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Clearwater Wind
Project) (UE 427)

STIPULATION

This Stipulation (Stipulation) is between Portland General Electric Company (PGE), Staff of the Public Utility Commission of Oregon (Staff), and Oregon Citizens' Utility Board (CUB) (collectively, the Stipulating Parties). There are no other parties in this docket.

I. INTRODUCTION

In accordance with its tariff Schedule 122, PGE filed its renewable resources automatic adjustment clause tariff under Docket No. UE 427 (UE 427) on October 30, 2023, for inclusion of costs and benefits from the Clearwater Wind Project. Included within the filing were PGE's testimony and exhibits.

The Parties subsequently reviewed PGE's filings and work papers and Staff asked numerous data requests. Staff filed opening testimony on February 6, 2024. The Stipulating Parties held settlement conferences on February 14 and 15, 2024. As a result of those discussions, the Stipulating Parties reached agreement settling all issues in this docket as set forth below. The Stipulating Parties request that the Commission issue an order before April 1, 2024, adopting this Stipulation.

II. TERMS OF STIPULATION

1. This Stipulation resolves all issues in this docket.
2. Schedule 122 Tariff-Effective Date
 - a. The Stipulating Parties agree to an April 1, 2024 price change for Schedule 122.
 - b. For purposes of determining the April 1, 2024 change in prices, a monthly forecast revenue requirement will be used and is provided as Attachment A.
3. Production Tax Credits (PTCs)
 - a. The Stipulating Parties agree that the \$19.7 million of Production Tax Credits (PTCs) currently included in Clearwater's rate base as a deferred tax asset (DTA) will be removed.
 - b. PGE's net variable power costs included in Clearwater's revenue requirement continue to include the value of the PTC.
 - c. Parties agree to support or not oppose a property sales application filed by PGE to sell the 2024 Clearwater PTCs for no less than 90% of the PTC value, inclusive of costs and fees associated with the sale.
 - i. Any additional expenses incurred to run a request for proposal process to sell the PTCs will not be recoverable and will be considered a normal ongoing business expense.
 - ii. The difference between the full value and the discounted value will be recoverable from customers within PGE's property sales balancing account.
4. Capacity Factor
 - a. The Stipulating Parties agree that PGE will reflect a capacity factor in MONET assuming 240 MW of firm transmission.

- i. Parties agree this capacity factor is 43.99% for 2024.
 - ii. PGE will also include the incremental cost of including 10MW of additional firm transmission.
 - b. For the first four years of forecasting Clearwater's capacity factor used in MONET (i.e., 2024 through 2027), the 5-year rolling average capacity factor used in MONET will be capped at an average change of no higher than 105% and no lower than 95% of the 2024 agreed upon factor of 43.99%.
5. Annual Performance Reporting
 - a. The Stipulating Parties agree that PGE will provide an annual performance report as part of its NVPC minimum filing requirements.
 - b. The report will include the following:
 - i. Expected (i.e., RFP and AUT) versus actual generation output;
 - ii. Expected (i.e., RFP and AUT) versus realized production tax credits; and
 - iii. RFP modeled NVPC vs. AUT forecasted NVPC.
 - c. PGE will provide reporting within its annual power cost update for ten years following the project's online date (i.e., through 2033).
6. The Stipulating Parties agree with the rate spread methodology as proposed in PGE Exhibit 100.
7. The Stipulating Parties recommend and request that the Commission approve this Stipulation as an appropriate and reasonable resolution of all issues in this docket.
8. The Stipulating Parties agree that this Stipulation represents a compromise in the positions of the Stipulating Parties. Without the written consent of all Stipulating Parties, evidence of conduct or statements, including but not limited to term sheets or other documents created

solely for use in settlement conferences in this docket, are confidential and not admissible in the instant or any subsequent proceeding, unless independently discoverable or offered for other purposes allowed under ORS 40.190.

9. The Stipulating Parties have negotiated this Stipulation as an integrated document. If the Commission rejects all or any material part of this Stipulation or adds any material condition to any final order that is not consistent with this Stipulation, each Stipulating Party reserves its right: (i) to withdraw from the Stipulation, upon written notice to the Commission and the other Stipulating Parties within five (5) business days of service of the final order that rejects this Stipulation, in whole or material part, or adds such material condition; (ii) pursuant to OAR 860-001-0350(9), to present evidence and argument on the record in support of the Stipulation, including the right to cross-examine witnesses, introduce evidence as deemed appropriate to respond fully to issues presented, and raise issues that are incorporated in the settlements embodied in this Stipulation; and (iii) pursuant to ORS 756.561 and OAR 860-001-0720, to seek rehearing or reconsideration, or pursuant to ORS 756.610 to appeal the Commission order. Nothing in this paragraph provides any Party the right to withdraw from this Stipulation as a result of the Commission's resolution of issues that this Stipulation does not resolve.
10. This Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Stipulation throughout this proceeding and in any appeal, provide witnesses to support this Stipulation (if specifically required by the Commission), and recommend that the Commission issue an order adopting the settlements contained herein. By entering into this Stipulation, no Stipulating Party shall be deemed to have approved, admitted or consented to the facts,

principles, methods or theories employed by any other Stipulating Party in arriving at the terms of this Stipulation. Except as provided in this Stipulation, no Stipulating Party shall be deemed to have agreed that any provision of this Stipulation is appropriate for resolving issues in any other proceeding.

11. This Stipulation may be signed in any number of counterparts, each of which will be an original for all purposes, but all of which taken together will constitute one and the same agreement.

DATED this 15th day of February 2024.

PORTLAND GENERAL ELECTRIC
COMPANY



Kim Burton

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

/s/ Stephanie Andrus

Stephanie Andrus

OREGON CITIZENS' UTILITY BOARD

/s/ Bob Jenks

Bob Jenks

WITNESS QUALIFICATION STATEMENT

NAME: Bob Jenks

EMPLOYER: Oregon Citizens' Utility Board of Oregon

TITLE: Executive Director

ADDRESS: 610 SW Broadway, Suite 400
Portland, OR 97205

EDUCATION: Bachelor of Science, Economics
Willamette University, Salem, OR

EXPERIENCE: Provided testimony or comments in a variety of OPUC dockets, including UE 88, UE 92, UM 903, UM 918, UE 102, UP 168, UT 125, UT 141, UE 115, UE 116, UE 137, UE 139, UE 161, UE 165, UE 167, UE 170, UE 172, UE 173, UE 207, UE 208, UE 210, UE 233, UE 246, UE 283, UG 152, UM 995, UM 1050, UM 1071, UM 1147, UM 1121, UM 1206, UM 1209, UM 1355, UM 1635, UM 1633, and UM 1654. Participated in the development of a variety of Least Cost Plans and PUC Settlement Conferences. Provided testimony to Oregon Legislative Committees on consumer issues relating to energy and telecommunications. Lobbied the Oregon Congressional delegation on behalf of CUB and the National Association of State Utility Consumer Advocates.

Between 1982 and 1991, worked for the Oregon State Public Interest Research Group, the Massachusetts Public Interest Research Group, and the Fund for Public Interest Research on a variety of public policy issues.

MEMBERSHIP: National Association of State Utility Consumer Advocates
Board of Directors, OSPIRG Citizen Lobby
Telecommunications Policy Committee, Consumer Federation of America
Electricity Policy Committee, Consumer Federation of America
Board of Directors (Public Interest Representative), NEEA

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 427**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Clearwater Wind
Project).

DECLARATION OF ANNA KIM
REGARDING TESTIMONY & EXHIBITS

I, Anna Kim, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Anna Kim. My title is Energy Costs Section Manager employed in the Rates, Safety and Utility Performance Program of the Public Utility Commission of Oregon.
2. On behalf of Staff, I sponsored direct testimony in this proceeding, Staff/300 and supporting exhibits 301 and 302.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the same questions today my answers would be the same.

DATED this 5th day of March, 2024.

Respectfully submitted,

/s/ Anna Kim
Anna Kim

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 427**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Clearwater Wind
Project).

DECLARATION OF BOB JENKS
REGARDING TESTIMONY & EXHIBITS

I, Bob Jenks, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Bob Jenks. My title is Executive Director of the Oregon Citizens' Utility Board (CUB).
2. On behalf of CUB, I sponsored direct testimony in this proceeding, Stipulating Parties/100, with supporting exhibits 101 and 102.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the same questions today my answers would be the same.

DATED this 5th day of March, 2024.

Respectfully submitted,

/s/ Bob Jenks
Bob Jenks

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 427**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Clearwater Wind
Project).

DECLARATION OF CURTIS DLOUGHY
REGARDING TESTIMONY & EXHIBITS

I, Curtis Dloughy, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Curtis Dloughy. I am an Economist with the Strategy and Integration Division of the Oregon Public Utility Commission (Staff).
2. On behalf of Staff, I sponsored direct testimony in this proceeding, Staff/200, with supporting exhibits 201-207.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the same questions today my answers would be the same.

DATED this 5th day of March, 2024.

Respectfully submitted,

/s/ Curtis Dloughy
Curtis Dloughy

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 427**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Clearwater Wind
Project).

DECLARATION OF GREG BATZLER
REGARDING TESTIMONY & EXHIBITS

I, Greg Batzler, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Greg Batzler. My title is Senior Regulatory Consultant in the Rate and Regulatory Department at Portland General Electric Company (PGE).
2. On behalf of PGE, I sponsored direct testimony in this proceeding, PGE/100 with supporting exhibits 101-102 and Stipulating Parties/100, with supporting exhibits 101 and 102.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the same questions today my answers would be the same.

DATED this 5th day of March 2024.

Respectfully submitted,

/s/ Greg Batzler
Greg Batzler

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 427**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Clearwater Wind
Project).

DECLARATION OF MIKE ABEL
REGARDING TESTIMONY & EXHIBITS

I, Mike Abel, declare under penalty of perjury under the laws of the State of
Oregon:

1. My full name is Mike Abel. My title is Principal Construction Project Manager in the
Transmission and Distribution Project Management Department of Portland General Electric
Company (PGE).
2. I sponsored direct testimony on behalf of PGE in this proceeding, PGE/100, with supporting
exhibits PGE/101-102.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the
same questions today my answers would be the same.

DATED this 5th day of March 2024.

Respectfully submitted,

/s/ Mike Abel
Mike Abel

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 427**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Renewable Resource Automatic Adjustment
Clause (Schedule 122) (Clearwater Wind
Project).

DECLARATION OF RAWLEIGH WHITE
REGARDING TESTIMONY & EXHIBITS

I, Rawleigh White, declare under penalty of perjury under the laws of the State of Oregon:

1. My full name is Rawleigh White. My title is Senior Financial Analyst for the Public Utility Commission of Oregon (Staff).
2. On behalf of Staff, I sponsored direct testimony in this proceeding, Staff/100 with supporting exhibits 101-102 and Stipulating Parties/100, with supporting exhibits 101-102.
3. To the best of my knowledge and belief, my testimony is true and accurate. If I were asked the same questions today my answers would be the same.

DATED this 5th day of March, 2024.

Respectfully submitted,

/s/ Rawleigh White
Rawleigh White