

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UG 366**

4 In the Matter of

5 AVISTA CORPORATION, dba AVISTA
6 UTILITIES,

7 Request for a General Rate Revision.

**STAFF'S MOTION TO ADMIT
TESTIMONY AND EXHIBITS**

8 Public Utility Commission of Oregon Staff (Staff) moves for the admission of the
9 following pre-filed Staff testimony, witness qualification statements, and exhibits into the record as
10 evidence in this proceeding:

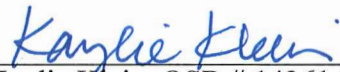
- 11 • Staff Exhibits 100-101 – Opening Testimony of Marianne Gardner
- 12 • Staff Exhibits 200-203 – Opening Testimony of Mitchell Moore
- 13 • Staff Exhibits 300-308 – Opening Testimony of John L. Fox
- 14 • Staff Exhibits 400-406 – Opening Testimony of Brian Fjeldheim
- 15 • Staff Exhibits 500-502 – Opening Testimony of Paul Rossow
- 16 • Staff Exhibits 600-602 – Opening Testimony of Ming Peng
- 17 • Staff Exhibits 700-705 – Opening Testimony of Sabrina Soldavini
- 18 • Staff Exhibits 800-801 – Opening Testimony of Steve Storm
- 19 • Staff Exhibits 900-902 – Opening Testimony of George Compton
- 20 • Staff Exhibits 1000-1001 – Opening Testimony of Scott Gibbens
- 21 • Staff Exhibits 1100-1101 and 1103-1113 – Testimony of Matt Muldoon in Support of
22 Partial Stipulation
- 23 • Staff Exhibits 1100 and 1102-1113 – Testimony of Moya Enright in Support of Partial
24 Stipulation
- 25 • Joint Testimony Exhibits 100 and 200 – Marianne Gardner's contributions to Joint
26 Testimony in support of the first and second settlement stipulation

1 Attached with this motion are the declarations of the abovementioned Staff witnesses
2 attesting to the truthfulness of their testimony, witness qualification statements, and exhibits.

3 DATED this 28th day of August, 2019.

4 Respectfully submitted,

5 ELLEN F. ROSENBLUM
6 Attorney General

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8 Kaylie Klein, OSB # 143614
9 Assistant Attorney General
10 Of Attorney for Staff of the Public Utility
11 Commission of Oregon
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4 UG 366

5 In the Matter of

6 AVISTA CORPORATION, dba AVISTA
7 UTILITIES,

8 Request for a General Rate Revision.

DECLARATION OF MARIANNE GARDNER

9
10 I, Marianne Gardner, declare under penalty of perjury under the laws of the State of
11 Oregon:

12 1. My name is Marianne Gardner. I am employed by the Public Utility Commission
13 of Oregon as the Program Manager of Rates and Accounting in the Energy Rates Finance and
14 Audit Division.

15 2. I am the same Marianne Gardner who prepared Staff Opening Testimony, sections
16 of Joint Testimony in support of the first and second settlement stipulations, Witness Qualification
17 Statement, and Exhibits filed in this docket as Staff Exhibits/100-101 and Joint Testimony/100 and
18 /200.

19 3. My Testimony, Witness Qualification Statement, and Exhibits are true and accurate
20 based on my knowledge and belief.

21 I hereby declare that the above statement is true to the best of my knowledge and belief,
22 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

23 SIGNED this 22nd day of August, 2019 at Salem, Oregon.

24 Signed: Marianne Gardner
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DECLARATION OF MITCHELL MOORE

9
10 I, Mitchell Moore, declare under penalty of perjury under the laws of the State of Oregon:


11 1. My name is Mitchell Moore. I am employed by the Public Utility Commission of
12 Oregon as a Senior Utility Analyst in the Energy Rates Finance and Audit Division.

13 2. I am the same Mitchell Moore who prepared Staff Opening Testimony, Witness
14 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/200-203.

15 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
16 accurate based on my knowledge and belief.

17 I hereby declare that the above statement is true to the best of my knowledge and belief,
18 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

19 SIGNED this 22 day of August, 2019 at Salem, Oregon.

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DECLARATION OF JOHN L. FOX

9
10 I, John L. Fox, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is John L. Fox. I am employed by the Public Utility Commission of
12 Oregon as a Senior Financial Analyst in the Energy Rates Finance and Audit Division.

13 2. I am the same John L. Fox who prepared Staff Opening Testimony, Witness
14 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/300-308.

15 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
16 accurate based on my knowledge and belief.

17 I hereby declare that the above statement is true to the best of my knowledge and belief,
18 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

19 SIGNED this 26 day of August, 2019 at Salem, Oregon.

20 Signed: _____

John L. Fox

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7 UTILITIES,

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DECLARATION OF BRIAN FJELDHEIM

9
10 I, Brian Fjeldheim, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is Brian Fjeldheim. I am employed by the Public Utility Commission of
12 Oregon as a Senior Financial Analyst in the Energy Rates Finance and Audit Division.

13 2. I am the same Brian Fjeldheim who prepared Staff Opening Testimony, Witness
14 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/400-406.

15 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
16 accurate based on my knowledge and belief.

17 I hereby declare that the above statement is true to the best of my knowledge and belief,
18 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

19 SIGNED this 26 day of August, 2019 at Salem, Oregon.

20 Signed: Brian Fjeldheim
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DECLARATION OF PAUL ROSSOW

9
10 I, Paul Rossow, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is Paul Rossow. I am employed by the Public Utility Commission of
12 Oregon as a Utility Analyst in the Energy Resources and Planning Division.

13 2. I am the same Paul Rossow who prepared Staff Opening Testimony, Witness
14 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/500-502.

15 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
16 accurate based on my knowledge and belief.

17 I hereby declare that the above statement is true to the best of my knowledge and belief,
18 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

19 SIGNED this 22 day of August, 2019 at Salem, Oregon.

20 Signed: Paul Rossow
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DECLARATION OF MING PENG

10 I, Ming Peng, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is Ming Peng. I am employed by the Public Utility Commission of
12 Oregon as a Senior Economist in the Energy Rates Finance and Audit Division.

13 2. I am the same Ming Peng who prepared Staff Opening Testimony, Witness
14 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/600-602.

15 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
16 accurate based on my knowledge and belief.

17 I hereby declare that the above statement is true to the best of my knowledge and belief,
18 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

19 SIGNED this 27 day of August, 2019 at Salem, Oregon.

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DECLARATION OF SABRINNA SOLDAVINI

9
10 I, Sabrina Soldavini, declare under penalty of perjury under the laws of the State of
11 Oregon:

12 1. My name is Sabrina Soldavini. I am employed by the Public Utility Commission
13 of Oregon as a Senior Regulatory Analyst in the Energy Rates Finance and Audit Division.

14 2. I am the same Sabrina Soldavini who prepared Staff Opening Testimony, Witness
15 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/700-705.

16 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
17 accurate based on my knowledge and belief.

18 I hereby declare that the above statement is true to the best of my knowledge and belief,
19 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

20 SIGNED this 22nd day of August, 2019 at Salem, Oregon.

21 Signed: _____
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DECLARATION OF STEVE STORM

9
10 I, Steve Storm, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is Steve Storm. I am employed by the Public Utility Commission of
12 Oregon as a Senior Economist in the Energy Rates Finance and Audit Division.

13 2. I am the same Steve Storm who prepared Staff Opening Testimony, Witness
14 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/800-801.

15 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
16 accurate based on my knowledge and belief.

17 I hereby declare that the above statement is true to the best of my knowledge and belief,
18 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

19 SIGNED this 22nd day of August, 2019 at Salem, Oregon.

20 Signed:  _____

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DECLARATION OF GEORGE COMPTON

9
10 I, George Compton, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is George Compton. I am employed by the Public Utility Commission of
12 Oregon as a Senior Economist in the Energy Rates Finance and Audit Division.

13 2. I am the same George Compton who prepared Staff Opening Testimony, Witness
14 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/900-902.

15 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
16 accurate based on my knowledge and belief.

17 I hereby declare that the above statement is true to the best of my knowledge and belief,
18 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

19 SIGNED this 22nd day of August, 2019 at Salem, Oregon.

20 Signed: George R Compton
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DECLARATION OF SCOTT GIBBENS

9
10 I, Scott Gibbens, declare under penalty of perjury under the laws of the State of Oregon:

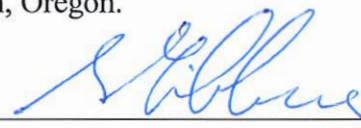
11 1. My name is Scott Gibbens. I am employed by the Public Utility Commission of
12 Oregon as a Senior Economist in the Energy Rates Finance and Audit Division.

13 2. I am the same Scott Gibbens who prepared Staff Opening Testimony, Witness
14 Qualification Statement, and Exhibits filed in this docket as Staff Exhibits/1000-1001.

15 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
16 accurate based on my knowledge and belief.

17 I hereby declare that the above statement is true to the best of my knowledge and belief,
18 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

19 SIGNED this 22nd day of August, 2019 at Salem, Oregon.

20 Signed: 

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DECLARATION OF MATT MULDOON

9
10 I, Matt Muldoon, declare under penalty of perjury under the laws of the State of Oregon:


11 1. My name is Matt Muldoon. I am employed by the Public Utility Commission of
12 Oregon as a Senior Economist in the Energy Rates Finance and Audit Division.

13 2. I am the same Matt Muldoon who prepared Staff Testimony in Support of Partial
14 Stipulation, Witness Qualification Statement, and Exhibits filed in this docket as Staff
15 Exhibits/1100-1101 and /1103-1113.

16 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
17 accurate based on my knowledge and belief.

18 I hereby declare that the above statement is true to the best of my knowledge and belief,
19 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

20 SIGNED this 22 day of August, 2019 at Salem, Oregon.

21 Signed: Matthew J. Muldoon
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6 AVISTA CORPORATION, dba AVISTA
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DECLARATION OF MOYA ENRIGHT

9
10 I, Moya Enright, declare under penalty of perjury under the laws of the State of Oregon:

11 1. My name is Moya Enright. I am employed by the Public Utility Commission of
12 Oregon as a Senior Utility and Energy Analyst in the Energy Rates Finance and Audit Division.

13 2. I am the same Moya Enright who prepared Staff Testimony in Support of Partial
14 Stipulation, Witness Qualification Statement, and Exhibits filed in this docket as Staff
15 Exhibits/1100 and /1102-1113.

16 3. My Opening Testimony, Witness Qualification Statement, and Exhibits are true and
17 accurate based on my knowledge and belief.

18 I hereby declare that the above statement is true to the best of my knowledge and belief,
19 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

20 SIGNED this 27 day of August, 2019 at Salem, Oregon.

21 Signed: M. Enright
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