



October 11, 2023

VIA ELECTRONIC FILING

Oregon Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

Re: UG 461: **Errata** Motion to Admit Pre-Filed Testimony and Exhibits by Sierra Club and Climate Solutions

Dear Filing Center,

Enclosed for filing in Docket No. UG 461, please find:

- **Errata** Motion to Admit Pre-Filed Testimony by Intervenors Sierra Club and Climate Solutions
- **Errata** Declaration of Greer Ryan
- Declaration of Dylan Plummer

The errata filings include minor edits to include inadvertently omitted joint testimony and exhibits in support the second settlement stipulation numbered Stipulating Parties/200-202, Muldoon-Schultz-Miller-Garrett-Mullins-Plummer-Ryan.

All errata portions of the filings are in **bold type**.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Adam Hinz".

Adam Hinz  
Paralegal  
Earthjustice  
810 Third Avenue, Suite 610  
Seattle, WA 98104  
206-343-7340  
ahinz@earthjustice.org

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 461**

In the Matter of ) **ERRATA ENVIRONMENTAL**  
 ) **INTERVENORS' MOTION TO**  
 AVISTA CORPORATION, dba ) **ADMIT PRE-FILED TESTIMONY**  
 AVISTA UTILITIES, ) **AND EXHIBITS**  
 )  
 Request for a General Rate Revision. )  
 \_\_\_\_\_ )

Sierra Club and Climate Solutions (“Environmental Intervenors”) respectfully ask the Administrative Law Judge to admit the following pre-filed testimony and exhibits into the record in the above captioned docket:

<b>Exhibit No.</b>	<b>Description</b>
Environmental Intervenors/100	Bradley Cebulko Opening Testimony
Environmental Intervenors/101	Brad Cebulko Qualification Statement
Environmental Intervenors/102	Brad Cebulko Resume
Environmental Intervenors/103	Avista Response to DR EG-012
Environmental Intervenors/104	Avista Response to DR CUB-002
Environmental Intervenors/105	Avista Response to DR EG-014 Attachment A
Environmental Intervenors/106	Avista Response to DR CUB-005
Environmental Intervenors/107	Avista Response to DR EG-015
Environmental Intervenors/108	Avista Response to DR EG-043
Environmental Intervenors/109	Avista Response to DR EG-055
Environmental Intervenors/110	Avista Response to DR EG-071
Environmental Intervenors/111	Avista Response to DR EG-030 Supplemental
Environmental Intervenors/200	Carra Sahler Opening Testimony
Environmental Intervenors/201	Carra Sahler Witness Qualification Statement
Environmental Intervenors/202	Carra Sahler Resume
Environmental Intervenors/203	Declaration of Grant Forsyth (23-cv-3070-SAB)
Environmental Intervenors/204	Declaration of Patrick Ehrbar (23-cv-3070-SAB)
Environmental Intervenors/205	Avista Response to DR EG-040 Supplemental
Environmental Intervenors/206	Avista Response to DR EG-038 Supplemental
Environmental Intervenors/207	Ed Burgess Testimony in UG 435
Environmental Intervenors/208	CPUC Line Extensions Order

<b>Exhibit No.</b>	<b>Description</b>
Environmental Intervenors/209	Excerpts of PSE Settlement Order UE-220066
Environmental Intervenors/210	Avista Response to DR EG-014 Supplemental
Environmental Intervenors/211	Avista Response to DR CUB-001 Supplemental
Environmental Intervenors/212	Avista Response to DR CUB-001 Attachment A
Environmental Intervenors/213	Avista Response to DR CUB-002
Environmental Intervenors/214	Avista Response to DR EG-013
Environmental Intervenors/215	Avista Response to DR Staff-184
Environmental Intervenors/216	Avista Response to DR Staff-184 Attachment A
Environmental Intervenors/217	Avista Response to DR EG-015
Environmental Intervenors/300	Greer Ryan Opening Testimony
Environmental Intervenors/301	Greer Ryan Qualification Statement
Environmental Intervenors/302	Greer Ryan CV
Environmental Intervenors/303	Avista Response to DR EG-025
Environmental Intervenors/304	Avista Response to DR DR-057
Environmental Intervenors/305	Staff_DR_057 Attachment A_EXCERPTS _ Baker Botts1.xlsx
Environmental Intervenors/306	Avista Response to DR EG-066
Environmental Intervenors/307	Avista Response to DR EG-002
Environmental Intervenors/308	Avista Response to DR EG-002 Attachment D - RNG 2022 Individual Responses
Environmental Intervenors/309	Avista Response to DR EG-021
Environmental Intervenors/310	Avista Response to DR EG-021 Attachment A
Environmental Intervenors/311	Avista Response to DR EG-068
Environmental Intervenors/312	AGA - Form 990 - 2021
Environmental Intervenors/313	FERC_Petition_Exhibit_B_Additional_Associations
Environmental Intervenors/314	AGA Gas Stove Report
Environmental Intervenors/315	HB 3409 Letter
Environmental Intervenors/316	Lobbying Email
Environmental Intervenors/317	Avista Response to DR EG-022
Environmental Intervenors/318	Avista Response to DR EG-067C
Environmental Intervenors/319	Avista Response to DR EG-067C Confidential Attachment A - AGA - 2023 Membership Dues Invoice
Environmental Intervenors/320	Avista Response to DR EG-067C Confidential Attachment B - NWGA - 2023 Membership Dues Invoice
Environmental Intervenors/321	Staff_DR_057 Attachment A_EXCERPTS_Other Association Expenses.xlsx
Environmental Intervenors/322	Joint Letter from Labor Unions & Business RE Decarbonization Bills
Environmental Intervenors/323	Avista Response to DR Staff-104

<b>Exhibit No.</b>	<b>Description</b>
Environmental Intervenors/324	Staff_DR_104 Attachment A.xls
Environmental Intervenors/325	Avista Response to DR EG-084 Attachment A - #1 10_22_OR
Environmental Intervenors/326	Avista Response to DR EG-084 Attachment A - Community Ad 0412
Environmental Intervenors/327	Avista Response to DR EG-084 Attachment A - #2 09_22_OR
Environmental Intervenors/328	Avista Response to DR EG-084 Attachment A - #3 06_22_OR
Environmental Intervenors/329	Avista Response to DR Staff-173
Environmental Intervenors/330	Avista Response to DR Staff-173 Attachment A
Environmental Intervenors/331	2022.03.18 Initiating Document - Petition for Judicial Review COA No. A178217
Environmental Intervenors/400	Benedikt Springer Opening Testimony
Environmental Intervenors/401	Benedikt Springer Qualification Statement
Environmental Intervenors/402	Benedikt Springer Resume
Environmental Intervenors/403	Avista LINA
Environmental Intervenors/404	Avista Email
<b>Stipulating Parties/200</b>	<b>Joint Testimony in Support of the Second Settlement Stipulation</b>
<b>Stipulating Parties/201</b>	<b>Second Settlement Stipulation Resolving All Remaining Issues</b>
<b>Stipulating Parties/202</b>	<b>Dylan Plummer Statement of Qualifications</b>

This Motion to Admit Pre-Filed Testimony and Exhibits is supported by Declarations of Bradley Cebulko, Carra Sahler, Greer Ryan, Benedikt Springer, **and Dylan Plummer**. These witnesses attest to the truthfulness of their testimony in each declaration. The Declarations are attached hereto.

Dated this 11th day of October, 2023.

/s/ Noelia Gravotta

Jaimini Parekh

Senior Attorney, OSB No. 226337

Jan Hasselman

Senior Attorney, WSBA No. 29107

(admitted pro hac vice)

Noelia Gravotta, WSBA No. 60089

**ERRATA ENVIRONMENTAL INTERVENORS' MOTION TO ADMIT  
PRE-FILED TESTIMONY AND EXHIBITS - 3  
UG 461**

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 461**

In the Matter of	)	<b>ERRATA DECLARATION OF</b>
	)	<b>GREER RYAN</b>
AVISTA CORPORATION, dba	)	
AVISTA UTILITIES,	)	
	)	
Request for a General Rate Revision.	)	
_____	)	

I, Greer Ryan, do hereby declare and say:

1. My name is Greer Ryan, and I am the Clean Buildings Policy Manager for Climate Solutions. I am appearing in this proceeding for Sierra Club and Climate Solutions (“Environmental Intervenors”). My business address is 1300 SE Stark St. #207, Portland, Oregon 97214.
2. I submit this declaration in support of Environmental Intervenors’ Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored testimony and exhibits in this docket numbered Environmental Intervenors/300 through Environmental Intervenors/331. **I also sponsored joint testimony and exhibits in support of the second settlement stipulation numbered Stipulating Parties/200-202, Muldoon-Schultz-Miller-Garrett-Mullins-Plummer-Ryan.**
4. The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 11th day of October, 2023.

/s/ Greer Ryan  
Greer Ryan

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 461**

In the Matter of	)	DECLARATION OF
	)	DYLAN PLUMMER
AVISTA CORPORATION, dba	)	
AVISTA UTILITIES,	)	
	)	
Request for a General Rate Revision.	)	
_____	)	

I, Dylan Plummer, do hereby declare and say:

1. My name is Dylan Plummer, and I am a Senior Campaign Representative for Sierra Club’s Building Electrification Campaign. I am appearing in this proceeding for Sierra Club and Climate Solutions (“Environmental Intervenors”). My business address is 1821 SE Ankeny St., Portland, OR 97214.
2. I submit this declaration in support of Environmental Intervenors’ Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored joint testimony and exhibits in support of the second settlement stipulation numbered Stipulating Parties/200-202, Muldoon-Schultz-Miller-Garrett-Mullins-Plummer-Ryan.
4. The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.



I hereby declare that the above statements are true to the best of my present knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 11th day of October, 2023.

/s/ Dylan Plummer  
Dylan Plummer