



ALISHA TILL
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December 11, 2018

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

**Re: Docket UM 1829 – In the Matter of Blue Marmot V LLC vs Portland General
Electric Company**

Attention Filing Center:

Attached for filing in the above-captioned docket is the Parties' Joint Motion to Admit Pre-filed
Testimony and Exhibits.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1829**

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
Blue Marmot VIII LLC
Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.

**PARTIES' JOINT MOTION TO
ADMIT PRE-FILED TESTIMONY
AND EXHIBITS**

1 Portland General Electric Company (PGE) and the above-captioned Blue Marmot LLCs
2 (Blue Marmots) jointly move for the following to be admitted into the record in this proceeding:

3 1. All pre-filed testimony and exhibits:

| PGE'S PRE-FILED EXHIBITS | |
|---------------------------------|--|
| PGE/100 | Response Testimony of Brett Greene and Geoffrey Moore |
| PGE/101 | Exhibit Accompanying Response Testimony of Greene-Moore (Blue Marmots' Response to PGE Data Request 3) |
| PGE/102 | Exhibit Accompanying Response Testimony of Greene-Moore (Blue Marmots' Response to PGE Data Request 18) |
| PGE/103 | Exhibit Accompanying Response Testimony of Greene-Moore (Blue Marmots' Response to PGE Data Request 2) |
| PGE/200 | Response Testimony of Brett Sims, Aaron Rodehorst, and Pam Sporborg |
| PGE/201 | Exhibit Accompanying Response Testimony of Sims-Rodehorst-Sporborg (PGE Energy Imbalance Market Addendum: 2018 Scenario) |
| PGE/300 | Response Testimony of Frank Afranji, Sean Larson, and Matthew Richard |
| PGE/301 | CONFIDENTIAL Exhibit Accompanying Response Testimony of Afranji-Larson-Richard (System Impact Study) |
| PGE/302 | Exhibit Accompanying Response Testimony of Afranji-Larson-Richard (Review of Import Path Ratings and ATC Methodologies) |
| PGE/400 | Revised Surrebuttal Testimony of Brett Greene |
| PGE/401 | Exhibit Accompanying Revised Surrebuttal Testimony of Brett |

| | |
|---------|--|
| | Greene (Blue Marmots' Revised Response to PGE Data Request 2, Blue Marmots' Response to PGE Data Requests 28, 33, and 35) |
| PGE/500 | Revised Surrebuttal Testimony of Aaron Rodehorst and Geoffrey Moore |
| PGE/501 | Exhibit Accompanying Revised Surrebuttal Testimony of Rodehorst-Moore (PGE's Response to Blue Marmots' Data Request 152) |
| PGE/502 | Exhibit Accompanying Revised Surrebuttal Testimony of Rodehorst-Moore (EIM Transfers to Date Figures) |
| PGE/600 | Surrebuttal Testimony of Sarah Edmonds, Sean Larson, and Matthew Richard |
| PGE/601 | CONFIDENTIAL Exhibit Accompanying Surrebuttal Testimony of Edmonds-Larson-Richard (Blue Marmots' Response to PGE Data Requests 24, 25, and 27) |
| PGE/700 | Replacement Supplemental Testimony of Aaron Rodehorst and Geoffrey Moore |
| PGE/701 | Exhibit Accompanying Replacement Supplemental Testimony of Rodehorst-Moore (Tables Comparing Transfer Scenarios) |

| | |
|---|--|
| BLUE MARMOTS' PRE-FILED EXHIBITS | |
|---|--|

| | |
|-----------------|--|
| Blue Marmot/100 | Revised Opening Testimony of Steve Irvin |
| Blue Marmot/200 | Revised Opening Testimony of William Talbott |
| Blue Marmot/201 | Exhibit Accompanying Revised Opening Testimony of William Talbott |
| Blue Marmot/202 | Exhibit Accompanying Revised Opening Testimony of William Talbott |
| Blue Marmot/300 | Revised Opening Testimony of Keegan Moyer |
| Blue Marmot/301 | Exhibit Accompanying Revised Opening Testimony of Keegan Moyer |
| Blue Marmot/400 | Reply Testimony of Keegan Moyer |
| Blue Marmot/401 | Exhibit Accompanying Reply Testimony of Keegan Moyer |
| Blue Marmot/402 | Exhibit Accompanying Reply Testimony of Keegan Moyer |
| Blue Marmot/403 | CONFIDENTIAL Exhibit Accompanying Reply Testimony of Keegan Moyer |
| Blue Marmot/500 | Reply Testimony of Steve Irvin and William Talbott |
| Blue Marmot/600 | CONFIDENTIAL Replacement Sur-surrebuttal Testimony of Keegan Moyer |
| Blue Marmot/601 | Exhibit Accompanying Replacement Sur-surrebuttal Testimony of Keegan Moyer |
| Blue Marmot/700 | Supplemental Testimony of Keegan Moyer |
| Blue Marmot/701 | Exhibit Accompanying Supplemental Testimony of Keegan Moyer |

2. The attached affidavits of these same witnesses attesting that their pre-filed testimony and exhibits are true and correct. The composition of PGE’s witness panels has changed since PGE first filed its testimony in January, as some witnesses have changed roles in this case, or have left PGE. Therefore, the PGE witnesses’ affidavits confirm the testimony that the witnesses will be adopting and sponsoring as listed below:

- PGE/100: Mr. Greene only (Mr. Moore will be removed).
- PGE/200: Mr. Rodehorst and Mr. Moore (Mr. Sims and Ms. Sporborg will be removed).
- PGE/300: Ms. Edmonds, Mr. Larson, and Mr. Richard (Mr. Afranji will be removed).
- PGE/400, Mr. Greene only (as filed).
- PGE/500, Mr. Rodehorst and Mr. Moore (as filed).
- PGE/600, Ms. Edmonds, Mr. Larson, and Mr. Richard (as filed).
- PGE/700, Mr. Rodehorst and Mr. Moore (as filed).

3. The following cross-examination exhibits, except that PGE reserves the right to object to the admission of Blue Marmot Exhibit 802, and Blue Marmots reserve the right to object to the admission of PGE Exhibits 810 and 811.

| PGE’s CROSS-EXAMINATION EXHIBITS | |
|---|--|
| PGE/800 | Blue Marmots’ Response to PGE’s Data Request 32 |
| PGE/801 | Blue Marmots’ Response to PGE’s Data Request 33 |
| PGE/802 | Blue Marmots’ Response to PGE’s Data Request 36 |
| PGE/803 | Blue Marmots’ Supplemental Response to PGE’s Data Request 40 |
| PGE/804 | Blue Marmots’ Response to PGE’s Data Request 44 |
| PGE/805 | Blue Marmots’ Response to PGE’s Data Request 45 |
| PGE/806 | Blue Marmots’ Response to PGE’s Data Request 46 |
| PGE/807 | Blue Marmots’ Response to PGE’s Data Request 56 |
| PGE/808 | Blue Marmots’ Response to PGE’s Data Request 57 |
| PGE/809 | Blue Marmots’ Response to PGE’s Data Request 58 |
| PGE/810 | PGE’s Response to Blue Marmots’ Data Request 190 |
| PGE/811 | PGE’s Response to Blue Marmots’ Data Request 192 |
| PGE/812 | Blue Marmots’ Supplemental Response to PGE’s Data Request 3 |
| PGE/813 | Blue Marmots’ Second Revised Response to PGE’s Data Request 2 |
| PGE/814 | NV Energy Companies’ Application for Amendments to Market-Based Rate Tariffs Regarding Market-Based Rate Authority for the Energy Imbalance Market and Exhibit 2 Affidavit of Kelcey Brown |
| PGE/815 | Arizona Public Service Company’s Market-Based Application for |

| | |
|--|--|
| | the Energy Imbalance Market and Exhibit 2 Affidavit of Justin Thompson |
|--|--|

| BLUE MARMOTS' CROSS-EXAMINATION EXHIBITS | |
|---|--|
| Blue Marmot/800 | PGE webpage: "Sell Power to PGE - Install Solar, Wind & More PGE" |
| Blue Marmot/801 | PGE summary of terms of executed Airport Solar, LLC qualifying facility Power Purchase Agreement |
| Blue Marmot/802 | Excerpt of PGE's 2017 Form 10-K (cover and page 31 only) |
| Blue Marmot/803 | PGE's Schedule 201 (Effective May 23, 2018) |
| Blue Marmot/804 | Affidavit of John Morton |

Dated: December 11, 2018.

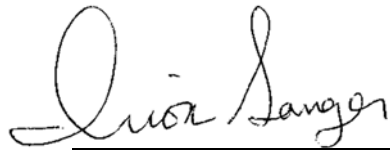
MCDOWELL RACKNER GIBSON PC

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 Jordan R. Schoonover
 419 SW 11th Avenue, Suite 400
 Portland, Oregon 97205
 Telephone: (503) 595-3925
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 dockets@mrg-law.com

PORTLAND GENERAL ELECTRIC COMPANY

Donald J. Light
 Assistant General Counsel
 121 SW Salmon Street, 1WTC1301
 Portland, Oregon 97204
 Telephone: (503) 464-8315
 donald.light@pgn.com

Attorneys for Portland General Electric Company

A handwritten signature in black ink, reading "Irion Sanger". The signature is written in a cursive style with a horizontal line underneath the name.

Irion A. Sanger
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
irion@sanger-law.com

Of Attorneys for Blue Marmot V, LLC, Blue
Marmot VI, LLC, Blue Marmot VII, LLC, Blue
Marmot VIII, LLC, and Blue Marmot IX, LLC

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
Blue Marmot VIII LLC
Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.


AFFIDAVIT OF BRETT GREENE

STATE OF OREGON)
) ss
County of Multnomah)

1 I, Brett Greene, being first duly sworn on oath, depose and say:
2 1. My name is Brett Greene and I am employed by Portland General Electric
3 Company (PGE) as the Director of Structuring, Origination and Strategic
4 Analytics.
5 2. I am the same Brett Greene that previously filed the following testimony
6 on behalf of PGE in this matter: PGE/100-103 and PGE/400-401.
7 3. My pre-filed testimony and exhibits are true and accurate based on my
8 information and belief. If I were asked the same questions today, my
9 answers would be the same.

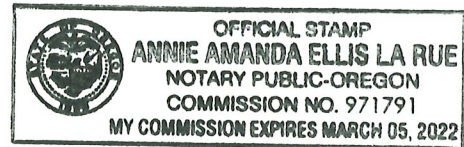
1 I declare under penalty of perjury under the laws of the state of Oregon that the
2 foregoing is true and correct based on my information and belief.

SIGNED this 11th day of December, 2018, at Portland, Oregon.

Signed: 

SUBSCRIBED AND SWORN to before me this 11th day of December, 2018.

Annie Amanda Ellis La Rue
Notary Public, State of Oregon
My Commission Expires 3-5-22



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
Blue Marmot VIII LLC
Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.

AFFIDAVIT OF AARON RODEHORST

STATE OF OREGON)
) ss
County of Multnomah)

1 I, Aaron Rodehorst, being first duly sworn on oath, depose and say:
2 1. My name is Aaron Rodehorst and I am employed by Portland General
3 Electric Company (PGE) as a Bidding Strategy Analyst.
4 2. I am the same Aaron Rodehorst that previously filed the following
5 testimony on behalf of PGE in this matter: PGE/200-201, PGE/500-502
6 and PGE/700-701.
7 3. My pre-filed testimony and exhibits are true and accurate based on my
8 information and belief. If I were asked the same questions today, my
9 answers would be the same.

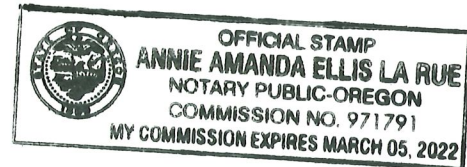
1 I declare under penalty of perjury under the laws of the state of Oregon that the
2 foregoing is true and correct based on my information and belief.

SIGNED this 11 day of December, 2018, at Portland, Oregon.

Signed: *A.M.H.*

SUBSCRIBED AND SWORN to before me this 11th day of December, 2018.

Annie Amanda Ellis La Rue
Notary Public, State of Oregon
My Commission Expires 3-05-22



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
Blue Marmot VIII LLC
Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.

AFFIDAVIT OF GEOFFREY MOORE


STATE OF OREGON)
) ss
County of Multnomah)

1 I, Geoffrey Moore, being first duly sworn on oath, depose and say:
2 1. My name is Geoffrey Moore and I am employed by Portland General
3 Electric Company, (PGE) as an Operations Analyst.
4 2. I am the same Geoffrey Moore that previously filed the following
5 testimony on behalf of PGE in this matter: PGE/100-103, PGE/500-502
6 and PGE/700-701.
7 3. I am also adopting the following testimony, on which my name did not
8 previously appear: PGE/200-201.
9 4. In addition, I am now removing myself as a witness from the following
10 testimony: PGE/100-103.
11 5. Altogether, I will now be sponsoring the following testimony in this case:
12 PGE/200-201, PGE/500-502, PGE/700-701.

1 6. My pre-filed testimony and exhibits are true and accurate based on my
2 information and belief. If I were asked the same questions today, my
3 answers would be the same.

4 I declare under penalty of perjury under the laws of the state of Oregon that the
5 foregoing is true and correct based on my information and belief.

SIGNED this 11 day of December, 2018, at Portland, Oregon.

Signed: 

SUBSCRIBED AND SWORN to before me this 11th day of December, 2018.

Annie Amanda Ellis La Rue
Notary Public, State of Oregon
My Commission Expires 3-5-22



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
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Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.

AFFIDAVIT OF SARAH EDMONDS

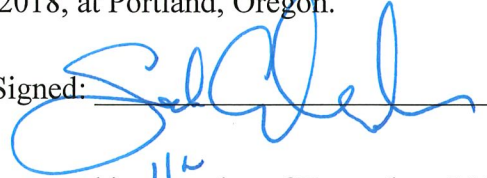
STATE OF OREGON)
) ss
County of Multnomah)

- 1 I, Sarah Edmonds, being first duly sworn on oath, depose and say:
- 2 1. My name is Sarah Edmonds and I am employed by Portland General
- 3 Electric Company (PGE) as the Director of Transmission and Reliability.
- 4 2. I am the same Sarah Edmonds that previously filed the following
- 5 testimony on behalf of PGE in this matter: PGE/600-601.
- 6 3. In addition, I am also adopting the following testimony, on which my
- 7 name did not previously appear: PGE/300-302.
- 8 4. Altogether, I will be sponsoring the following testimony in this case:
- 9 PGE/300-302 and PGE/600-601.
- 10 5. My pre-filed testimony and exhibits are true and accurate based on my
- 11 information and belief. If I were asked the same questions today, my
- 12 answers would be the same.

1 I declare under penalty of perjury under the laws of the state of Oregon that the
2 foregoing is true and correct based on my information and belief.

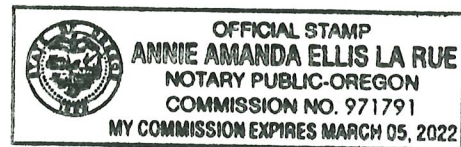
SIGNED this 11th day of December, 2018, at Portland, Oregon.

Signed: _____



SUBSCRIBED AND SWORN to before me this 11th day of December, 2018.

Annie Amanda Ellis La Rue
Notary Public, State of Oregon
My Commission Expires 3-5-22



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
Blue Marmot VIII LLC
Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.

AFFIDAVIT OF SEAN LARSON

STATE OF OREGON)
) ss
County of Multnomah)

1 I, Sean Larson, being first duly sworn on oath, depose and say:
2 1. My name is Sean Larson and I am employed by Portland General Electric
3 Company (PGE) as a Senior Transmission Planning Engineer.
4 2. I am the same Sean Larson that previously filed the following testimony
5 on behalf of PGE in this matter: PGE/300-302 and PGE/600-601.
6 3. My pre-filed testimony and exhibits are true and accurate based on my
7 information and belief. If I were asked the same questions today, my
8 answers would be the same, except that my job title has changed since my
9 testimony was filed, and I am now a Senior Transmission Planning
10 Engineer.

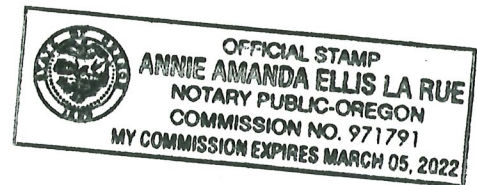
1 I declare under penalty of perjury under the laws of the state of Oregon that the
2 foregoing is true and correct based on my information and belief.

SIGNED this 11 day of December, 2018, at Portland, Oregon.

Signed: 

SUBSCRIBED AND SWORN to before me this 11th day of December, 2018.

Annie Amanda Ellis La Rue
Notary Public, State of Oregon
My Commission Expires 3-5-22



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
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Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.

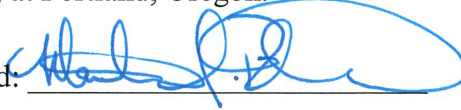
AFFIDAVIT OF MATTHEW RICHARD

STATE OF OREGON)
) ss
County of Multnomah)

1 I, Matthew Richard, being first duly sworn on oath, depose and say:
2 1. My name is Matthew Richard and I am employed by Portland General
3 Electric Company (PGE) as the administrator of PGE's Open Access
4 Same-Time Information System (OASIS) website.
5 2. I am the same Matthew Richard that previously filed the following
6 testimony on behalf of PGE in this matter: PGE/300-302 and PGE/600-
7 601.
8 3. My pre-filed testimony and exhibits are true and accurate based on my
9 information and belief. If I were asked the same questions today, my
10 answers would be the same.

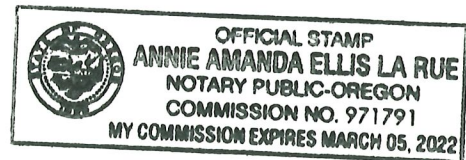
1 I declare under penalty of perjury under the laws of the state of Oregon that the
2 foregoing is true and correct based on my information and belief.

SIGNED this 11th day of December, 2018, at Portland, Oregon.

Signed: 

SUBSCRIBED AND SWORN to before me this 11th day of December, 2018.

Annie Amanda Ellis La Rue
Notary Public, State of Oregon
My Commission Expires 3-5-22



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829, UM 1830, UM 1831, UM 1832, UM 1833

| | | |
|------------------------------------|---|-----------------------|
| Blue Marmot V LLC (UM 1829), |) | |
| Blue Marmot VI LLC (UM 1830), |) | |
| Blue Marmot VII LLC (UM 1831), |) | |
| Blue Marmot VIII LLC (UM 1832), |) | |
| Blue Marmot IX LLC (UM 1833), |) | STEVE IRVIN AFFIDAVIT |
| Complainants, |) | |
| |) | |
| v. |) | |
| |) | |
| Portland General Electric Company, |) | |
| Defendant. |) | |

I, Steve Irvin, being first duly sworn on oath, depose and say:

1. My name is Steve Irvin. My business address is 808 Travis Street Suite 700, Houston, Texas 77002.
2. I sponsored pre-filed testimony and exhibits on behalf of the Blue Marmots in Oregon Public Utility Commission Docket No. UM 1829-1833. My pre-filed Opening Testimony is Blue Marmot/100, and my pre-filed Reply Testimony is Blue Marmot/500.
3. My testimony and exhibits that were previously filed are true and accurate, and no corrections need to be made.

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 AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 11th day of DECEMBER, 2018, at PORTLAND, OREGON.

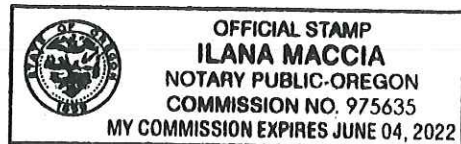


Steve Irvin

SUBSCRIBED AND SWORN to before me this 11 day of December, 2018.


NOTARY PUBLIC FOR OREGON

My Commission Expires: 6/4/22



BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1829, UM 1830, UM 1831, UM 1832, UM 1833

| | | |
|------------------------------------|---|------------------------|
| Blue Marmot V LLC (UM 1829), |) | |
| Blue Marmot VI LLC (UM 1830), |) | |
| Blue Marmot VII LLC (UM 1831), |) | |
| Blue Marmot VIII LLC (UM 1832), |) | |
| Blue Marmot IX LLC (UM 1833), |) | KEEGAN MOYER AFFIDAVIT |
| Complainants, |) | |
| |) | |
| v. |) | |
| |) | |
| Portland General Electric Company, |) | |
| Defendant. |) | |

I, Keegan Moyer, being first duly sworn on oath, depose and say:

1. My name is Keegan Moyer. My business address is 215 South State Street, Suite 200, Salt Lake City, Utah, 84111.
2. I sponsored pre-filed testimony and exhibits on behalf of the Blue Marmots in Oregon Public Utility Commission Docket No. UM 1829-1833. My pre-filed Opening Testimony is Blue Marmot/300-301, Reply Testimony is Blue Marmot/400-403, Surrebuttal Testimony is Blue Marmot/600-601, and Supplemental Testimony is Blue Marmot/700-701.
3. My testimony and exhibits that were previously filed are true and accurate, and no corrections need to be made.

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 AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 11TH day of DECEMBER, 2018, at PORTLAND, OREGON.

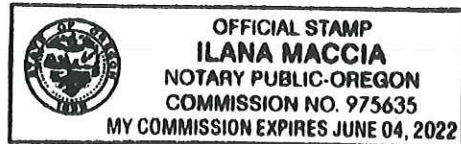


Keegan Moyer

SUBSCRIBED AND SWORN to before me this 11 day of December, 2018.


NOTARY PUBLIC FOR OREGON

My Commission Expires: 6/4/22



BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1829, UM 1830, UM 1831, UM 1832, UM 1833

| | | |
|------------------------------------|---|---------------------------|
| Blue Marmot V LLC (UM 1829), |) | |
| Blue Marmot VI LLC (UM 1830), |) | |
| Blue Marmot VII LLC (UM 1831), |) | |
| Blue Marmot VIII LLC (UM 1832), |) | |
| Blue Marmot IX LLC (UM 1833), |) | WILLIAM TALBOTT AFFIDAVIT |
| Complainants, |) | |
| |) | |
| v. |) | |
| |) | |
| Portland General Electric Company, |) | |
| Defendant. |) | |

I, William Talbott, being first duly sworn on oath, depose and say:

1. My name is William Talbott. My business address is 53 SW Yamhill Street, Portland, Oregon 97204.
2. I sponsored pre-filed testimony and exhibits on behalf of the Blue Marmots in Oregon Public Utility Commission Docket No. UM 1829-1833. My pre-filed Opening Testimony is Blue Marmot/200-202, and my pre-filed Reply Testimony is Blue Marmot/500.
3. My testimony and exhibits that were previously filed are true and accurate, and no corrections need to be made.

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 AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 11th day of December, 2018, at Portland, OREGON.

William Talbott

William Talbott

SUBSCRIBED AND SWORN to before me this 11 day of December, 2018.

Ilana Macchia
NOTARY PUBLIC FOR OREGON

My Commission Expires: 6/4/22

