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Portland, OR 97201

June 6, 2018

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
Draft Storage Potential Evaluation
Docket No. UM 1856

Dear Filing Center:

Please find enclosed the Joint Motion to Admit Pre-filed Testimony and Exhibits on behalf of the Alliance of Western Energy Consumers and the Northwest and Intermountain Power Producers Coalition in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1856

In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Draft Storage Potential Evaluation.)))))))	JOINT MOTION OF THE ALLIANCE OF WESTERN ENERGY CONSUMERS AND THE NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS
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Pursuant to OAR 860-001-0420, the Alliance of Western Energy Consumers (“AWEC”) and the Northwest and Intermountain Power Producers Coalition (“NIPPC”) hereby move for admission into the record of this proceeding the following pre-filed testimony and exhibits, submitted on behalf of AWEC-NIPPC:

Testimony & Exhibits	Description
ICNU-NIPPC/100	Opening Testimony of Dr. Benjamin Fitch-Fleischmann
ICNU-NIPPC/101	Qualification Statement of Dr. Benjamin Fitch-Fleischmann
ICNU-NIPPC/102	PGE Data Responses
ICNU-NIPPC/200	Opening Testimony of Daniel Crotzer
AWEC-NIPPC/300	Surrebuttal Testimony of Dr. Benjamin Fitch-Fleischmann (with revised pages dated May 22, 2018)
AWEC-NIPPC/301	PGE Responses to Data Requests
AWEC-NIPPC/400	Surrebuttal Testimony of Daniel Crotzer
AWEC-NIPPC/401	PGE Responses to Data Requests

The Affidavits of Dr. Benjamin Fitch-Fleischmann and Daniel Crotzer attesting to the truth and accuracy of the foregoing testimony and exhibits are attached.

Dated this 6th day of June, 2018

Respectfully submitted,

DAVISON VAN CLEVE, P.C. and
SANGER LAW, PC

/s/ Tyler C. Pepple

Tyler C. Pepple
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Of Attorneys for the
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/s/ Irion A. Sanger

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Of Attorneys for the
Northwest and Intermountain
Power Producers Coalition

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**


UM 1856

In the Matter of) AFFIDAVIT OF DR. BENJAMIN
PORTLAND GENERAL ELECTRIC) FITCH-FLEISCHMANN
COMPANY,)
Draft Storage Potential Evaluation.)
_____)

I, DR. BENJAMIN FITCH-FLEISCHMANN, being first duly sworn on oath, depose and say:

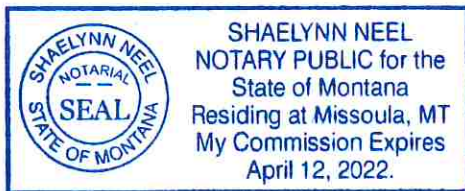
1. My name is Benjamin Fitch-Fleischmann. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers and the Northwest and Intermountain Power Producers Coalition (“AWEC-NIPPC”) in this matter.
2. I sponsored testimony and exhibit filings (ICNU-NIPPC/100-102 and AWEC-NIPPC/300-301) on behalf of AWEC-NIPPC in this matter.
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

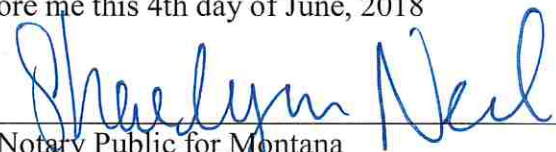
SIGNED this 4th day of June, 2018



Dr. Benjamin Fitch-Fleischmann

SUBSCRIBED AND SWORN to before me this 4th day of June, 2018





Notary Public for Montana
My Commission Expires: April 12, 2022

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1856

In the Matter of)	AFFIDAVIT OF
)	DANIEL CROTZER
PORTLAND GENERAL ELECTRIC)	
COMPANY,)	
)	
Draft Storage Potential Evaluation.)	
_____)	

I, DANIEL CROTZER, being first duly sworn on oath, depose and say:

1. My name is Daniel Crotzer. I am an independent consultant testifying on behalf of the Alliance of Western Energy Consumers and the Northwest and Intermountain Power Producers Coalition (“AWEC-NIPPC”) in this matter.

2. I sponsored testimony and exhibit filings (ICNU-NIPPC/200 and AWEC-NIPPC/400-401) on behalf of AWEC-NIPPC in this matter.

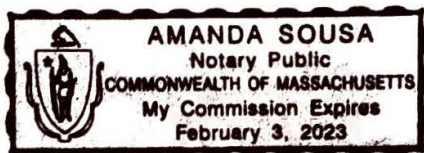

3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 6th day of June, 2018



Daniel Crotzer

SUBSCRIBED AND SWORN to before me this 6th day of June, 2018

Notary Public for Massachusetts

My Commission Expires: 02-03-2023