1	BEFORE THE PUBLIC UTILITY COMMISSION		
2	OF OREGON		
3	UM 1856		
4	In the Matter of		
5	PORTLAND GENERAL ELECTRIC	STAFF'S MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS, WITH	
6	COMPANY,	SUPPORTING DECLARATION	
7	Energy Storage Proposals and Revised Energy Storage Potential Evaluation		
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9			
10	On May 23, 2018, the Administrative Hearings Division issued a notice cancelling the		
11	hearing scheduled for this docket. Therefore, pursuant to OAR 860-001-0420, Staff of the		
12	Public Utility Commission of Oregon (Staff) moves to admit the following pre-filed testimony		
13	and exhibits into the record for this proceeding. The supporting declaration of Staff witness Seth		
14	Wiggins attesting to the accuracy and truthfulness of the pre-filed testimony and exhibits is		
15	attached to this motion.		
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PAGE 1 – UM 1856 – STAFF'S MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS, WITH SUPPORTING DECLARATION

2	Pre-Filed Exhibit	Description
3	Staff/100	Reply Testimony of Seth Wiggins
4	Staff/101	Witness Qualification Statement of Seth Wiggins
5	Staff/102-103	PGE Responses to Staff Data Requests
6 7	Staff/200	Surrebuttal Testimony of Seth Wiggins on whether PGE should be required to allow third-party ownership options for the Coffee Creek pilot project in its RFP
8		M 165 TCL 1
9	DATED this	day of June, 2018.
0		Respectfully submitted,
1 -		ELLEN F. ROSENBLUM
2		Attorney General
3		Kaylie Klein, OSB # 143614
.5		Assistant Attorney General Of Attorneys for Staff of the Public Utilit Commission of Oregon
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2	BEFORE THE PUBLIC UTILITY COMMISSION		
3	OF OREGON		
4	UM 1856		
567	In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, DECLARATION OF SETH WIGGINS		
8	Application for Transportation Electrification Programs		
10			
11	i, bear wiggins, decide dider penalty of perfury under the laws of the batte of oregon.		
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14	Testimony, Staff's Witness Qualification Statement, and additional supporting exhibits previously		
15	filed in this docket as Staff Exhibit/100, 101, 102, 103, and 200.		
16	3. My Reply and Surrebuttal Testimony, contributions to the Joint Testimony in		
17	Support of Partial Stipulation, Witness Qualification Statement, and Exhibits are true and accurate		
18	based on my knowledge and belief.		
19	I hereby declare that the above statement is true to the best of my knowledge and belief,		
20	and that I understand it is made for use as evidence in court and is subject to penalty for perjury.		
21	SIGNED this day of June, 2018 at Salem, Oregon.		
22			
23	Signed:		
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