

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1897**

In the Matter of

HYDRO ONE LIMITED,

Application for Authorization to Exercise
Substantial Influence over the Policies and
Actions of AVISTA CORPORATION

HYDRO ONE LIMITED’S MOTION TO
ADMIT PRE-FILED TESTIMONY AND
EXHIBITS

- 1 Hydro One Limited (“Hydro One”) moves for the admission of the following pre-filed
2 Hydro One testimony and supporting exhibits into the record as evidence in this proceeding:

Witness	Exhibit(s)	Title	Date Filed
Mayo Schmidt	Hydro One/200-202	Direct Testimony	9/14/17
	Hydro One/800-806	Rebuttal Testimony	3/29/18
	Hydro One/801	Errata Exhibit 801 to Rebuttal Testimony	4/16/18
Christopher Lopez	Hydro One/400-403	Direct Testimony	9/14/17
	Hydro One/900-904	Rebuttal Testimony	3/29/18
	Hydro One/1800	Supplemental Testimony	8/30/18
	Hydro One/2500- 2501	Rebuttal Testimony	10/4/18
Paul Dobson	Hydro One/2800	Final Testimony	10/31/18
	Hydro One/1400- 1401	Supplemental Testimony	8/30/18
	Hydro One/2200- 2201	Rebuttal Testimony	10/4/18
Thomas Woods	Hydro One/2900	Final Testimony	10/31/18
	Hydro One/1500- 1501	Supplemental Testimony	8/30/18
	Hydro One/2300- 2301	Rebuttal Testimony	10/4/18

	Hydro One/3000	Final Testimony	10/31/18
James Scarlett	Hydro One/1600-1602	Supplemental Testimony	8/30/18
	Hydro One/2400	Rebuttal Testimony	10/4/18
	Hydro One/2700	Final Testimony	10/31/18
John Reed	Hydro One/2000-2004	Supplemental Testimony	8/30/18
	Hydro One/2600-2601	Rebuttal Testimony	10/4/18
	Hydro One/3100	Final Testimony	10/31/18

1 Attached with this motion are the Declarations of Christopher Lopez, Paul Dobson,
2 Thomas Woods, James Scarlett, and John Reed attesting to the truthfulness of the pre-filed
3 testimony and supporting exhibits.

4 DATED this 3rd day of December 2018.

5 Respectfully Submitted,

6
7 K&L GATES LLP on Behalf of Hydro One
8 Limited and Olympus Equity LLC
9

10
11 BY: 
12 Elizabeth Thomas, Partner (pro hac vice)
13 Kari Vander Stoep, Partner (pro hac vice)
14 925 Fourth Avenue, Suite 2900
15 Seattle, WA 98104-1158
16 Liz.thomas@klgates.com
17 Kari.vanderstoep@klgates.com

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DECLARATION OF CHRISTOPHER F. LOPEZ

1 I, Christopher F. Lopez, declare under penalty of perjury under the laws of the State of
2 Oregon:

3 1. My name is Christopher F. Lopez. I am employed by Hydro One Limited
4 (“Hydro One”) as the Acting Chief Financial Officer (“CFO”).¹

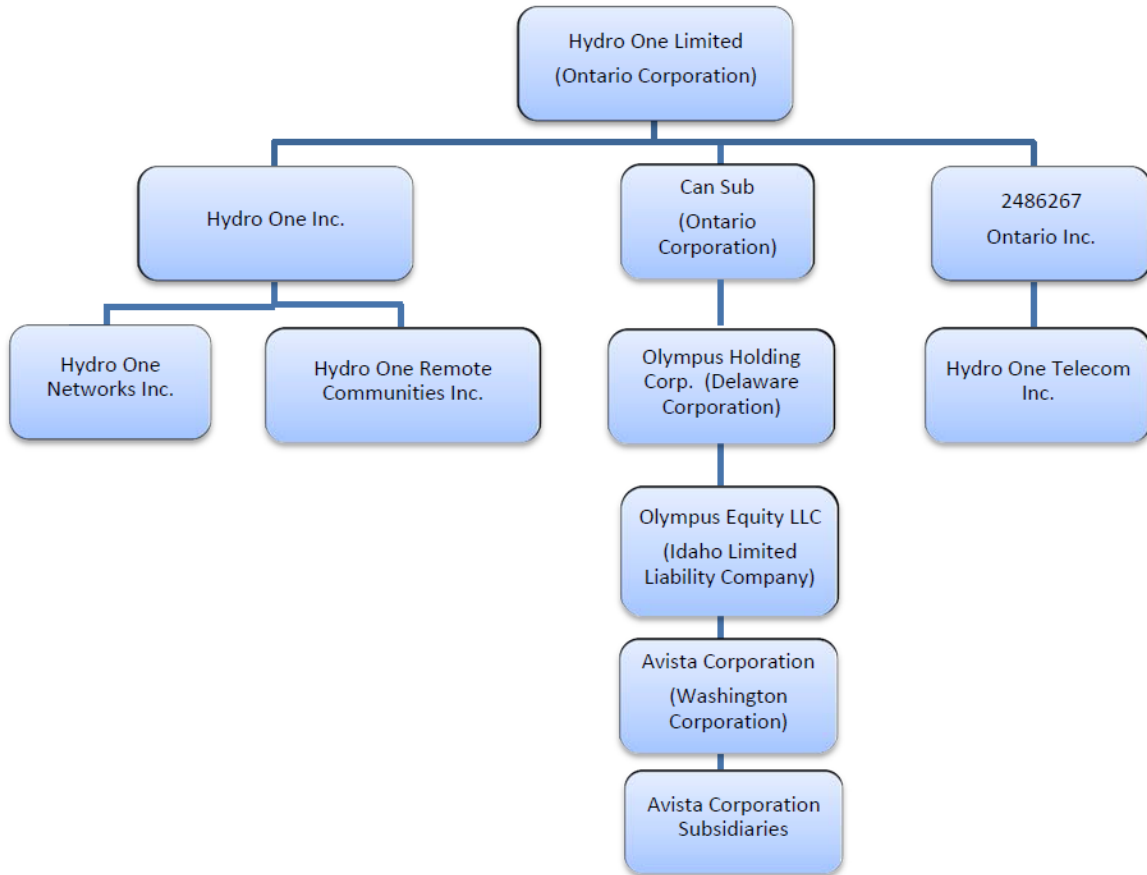
5 2. I am the same Christopher F. Lopez who prepared the following pre-filed
6 testimony and supporting exhibits in this docket:

- 7 • Hydro One/400-403 - Direct Testimony filed on 9/14/17
- 8 • Hydro One/900-904 - Rebuttal Testimony filed on 3/29/18
- 9 • Hydro One/1800 - Supplemental Testimony filed on 8/30/18
- 10 • Hydro One/2500-2501 - Rebuttal Testimony filed on 10/4/18
- 11 • Hydro One/2800 - Final Testimony filed on 10/31/18

12 3. My pre-filed testimony and supporting exhibits identified above are true and
13 accurate based on my knowledge and belief, with the exception of (i) page 5 of my Direct
14 Testimony, Exhibit 400, and page 2 of Exhibit 402, filed on September 14, 2017, and (ii) page 1

¹ I was appointed as Acting CFO on September 6, 2018. Prior to September 6, 2018, I was Senior Vice President of Finance for Hydro One.

1 of Exhibit 904, filed on March 29, 2018. The post-closing corporate structure on those pages has
2 been changed as follows:



3
4 Further, any references in my testimony to Olympus Equity LLC being formed as a
5 Delaware limited liability company should be changed to an Idaho limited liability company.

6 SIGNED this 30 day of November 2018 in Calgary, Alberta.

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8 Signed: 

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DECLARATION OF JAMES D. SCARLETT

1 I, James D. Scarlett, declare under penalty of perjury under the laws of the State of
2 Oregon:

3 1. My name is James D. Scarlett. I am employed by Hydro One Limited (“Hydro
4 One”) as Executive Vice President and Chief Legal Officer.

5 2. I am the same James D. Scarlett who prepared the following pre-filed testimony
6 and supporting exhibits in this docket:

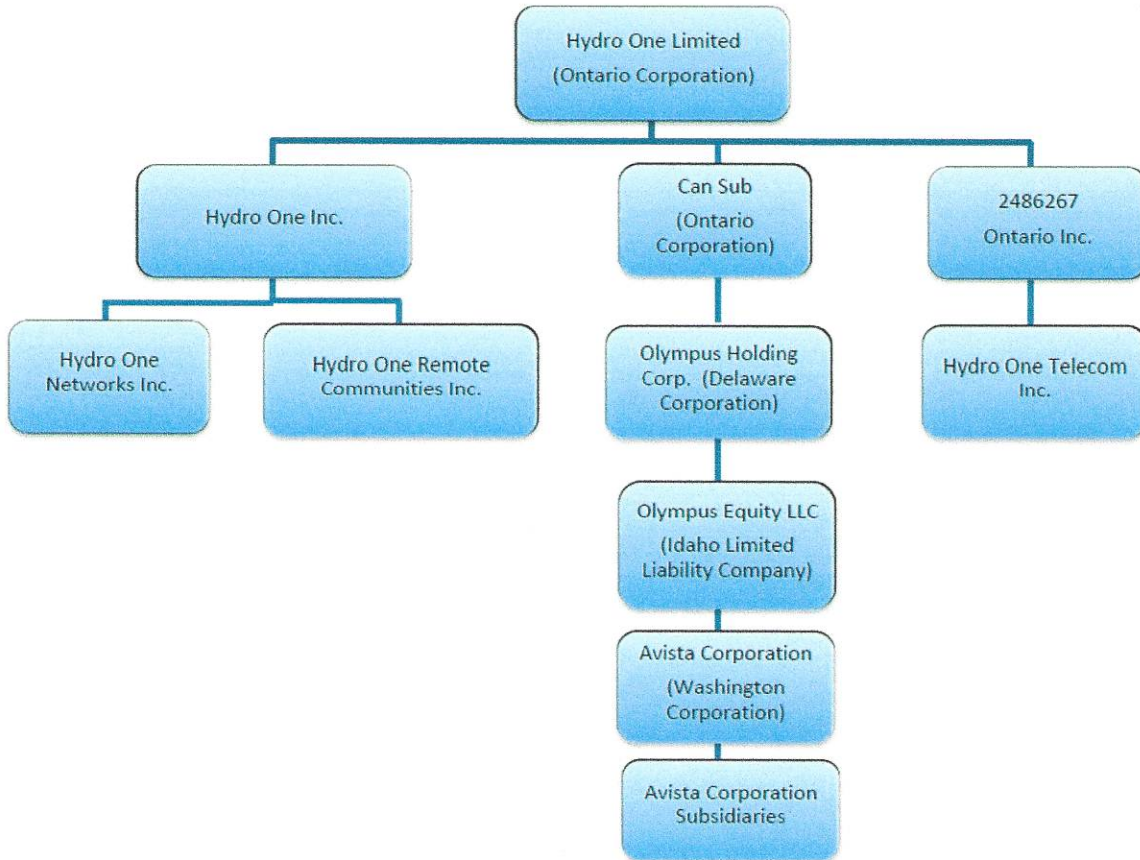
- 7 • Hydro One/1600-1602 - Supplemental Testimony filed on 8/30/18
- 8 • Hydro One/2400 - Rebuttal Testimony filed on 10/4/18
- 9 • Hydro One/2700 - Final Testimony filed on 10/31/18

10 3. I am the same James D. Scarlett who adopted the following pre-filed testimony
11 and supporting exhibits of former Hydro One President and Chief Executive Officer Mayo M.
12 Schmidt in my supplemental testimony filed on 8/30/18:

- 13 • Hydro One/200-202 - Direct Testimony filed on 9/14/17
- 14 • Hydro One/800-806 - Rebuttal Testimony filed on 3/29/18
- 15 • Hydro One/801 - Errata Exhibit 801 to Rebuttal Testimony filed on 4/16/18

1 4. My pre-filed testimony and supporting exhibits are true and accurate based on my
2 knowledge and belief, with the exception that any references in my testimony and exhibits to
3 Olympus Equity LLC being formed as a Delaware limited liability company should be changed
4 to an Idaho limited liability company.

5 5. The pre-filed testimony and supporting exhibits of Mayo M. Schmidt identified
6 above, and adopted in my August 30, 2018 testimony, are true and accurate based on my
7 knowledge and belief, subject to (i) the Province's ability to introduce, or threaten, legislation, as
8 evidenced by the events that have transpired in 2018, (ii) the passage of the *Hydro One*
9 *Accountability Act, 2018*, and (iii) the government's promise to reduce rates in Ontario. In
10 addition, the post-closing corporate structure on page 20 of Mr. Schmidt's September 14, 2017
11 Direct Testimony, and on pages 49 and 94 of Exhibit 802 to Mr. Schmidt's March 29, 2018
12 testimony, has been changed as follows:



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Any references in Mr. Schmidt's testimony and exhibits to Olympus Equity LLC being formed as a Delaware limited liability company should be changed to an Idaho limited liability company.

SIGNED this 30th day of November 2018 in Toronto, Ontario.

Signed: 

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DECLARATION OF JOHN J. REED

1 I, John J. Reed, declare under penalty of perjury under the laws of the State of Oregon:

2 1. My name is John J. Reed. I am President and Chief Executive Officer of
3 Concentric Energy Advisors, Inc. and CE Capital Advisors, Inc.

4 2. I am the same John J. Reed who prepared the following pre-filed testimony and
5 supporting exhibits on behalf of Hydro One Limited (“Hydro One”) and Avista Corporation in
6 this docket:

- 7 • Hydro One/2000-2004 - Supplemental Testimony filed on 8/30/18
- 8 • Hydro One/2600-2601 - Rebuttal Testimony filed on 10/4/18
- 9 • Hydro One/3100 - Final Testimony filed on 10/31/18

10 3. My pre-filed testimony and supporting exhibits identified above are true and
11 accurate based on my knowledge and belief.

12 SIGNED this 30 day of November 2018 in Marlborough, Massachusetts.

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Signed: _____



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DECLARATION OF PAUL M. DOBSON

1 I, Paul M. Dobson, declare under penalty of perjury under the laws of the State of
2 Oregon:

3 1. My name is Paul M. Dobson. I am employed by Hydro One Limited (“Hydro
4 One”) as the Acting President and Chief Executive Officer (“CEO”).

5 2. I am the same Paul M. Dobson who prepared the following pre-filed testimony
6 and supporting exhibits in this docket:

- 7 • Hydro One/1400-1401 - Supplemental Testimony filed on 8/30/18
- 8 • Hydro One/2200-2201 - Rebuttal Testimony filed on 10/4/18
- 9 • Hydro One/2900 - Final Testimony filed on 10/31/18

10 3. My pre-filed testimony and supporting exhibits identified above are true and
11 accurate based on my knowledge and belief.

12 SIGNED this 30th day of November 2018 in Toronto, Canada.

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Signed: 

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DECLARATION OF THOMAS D. WOODS

1 I, Thomas D. Woods, declare under penalty of perjury under the laws of the State of
2 Oregon:

3 1. My name is Thomas D. Woods. I am the Chair of the Board of Directors for
4 Hydro One Limited (“Hydro One”).

5 2. I am the same Thomas D. Woods who prepared the following pre-filed testimony
6 and supporting exhibits in this docket:

- 7 • Hydro One/1500-1501 - Supplemental Testimony filed on 8/30/18
- 8 • Hydro One/2300-2301 - Rebuttal Testimony filed on 10/4/18
- 9 • Hydro One/3000 - Final Testimony filed on 10/31/18

10 3. My pre-filed testimony and supporting exhibits identified above are true and
11 accurate based on my knowledge and belief.

12 SIGNED this 30th day of November 2018 in Toronto, Ontario.

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Signed: _____ *Thws* _____