

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 1897

In the Matter of the Application of Hydro One Limited (acting through its indirect Subsidiary Olympus Equity LLC) for an Order Authorizing Hydro One Limited To Exercise Substantial Influence Over the Policies and Actions of Avista Corporation

OREGON AND SOUTHERN IDAHO
DISTRICT COUNCIL OF LABORERS'
MOTION TO ADMIT PRE-FILED
TESTIMONY

Pursuant to OAR 860-001-0420, the Oregon and Southern Idaho District Council of Laborers (“OSIDCL”) moves for admission of the following pre-filed testimony into the record in the above-captioned proceeding:

1. OSIDCL Reply Testimony filed on February 12, 2018 (LIUNA\100-303);¹
2. OSIDCL Errata, filed February 14, 2018, to Testimonies filed February 12, 2018;
3. Joint Parties’ Testimony & Exhibits in Support of Settlement Stipulation, filed on June 19, 2018 (Joint Testimony/100-102).

The above-referenced testimony and exhibits were previously filed with the Commission and represent OSIDCL’s contribution to the record in this docket. The declarations of Chad Fenison, Aida Aranda, and Gary Jackson attesting to the truthfulness of their testimony is attached to this Motion.

Dated this 4th day of December, 2018.

Respectfully submitted,



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¹ OSIDCL is a chartered district council of Laborers International Union of North America (“LIUNA”). For this reason, the testimonies are labeled with the prefix of LIUNA.

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DECLARATION OF CHAD FENISON

I, Chad Fenison, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Chad Fenison. I am the Field Director for the Northwest Regional Organizing Coalition. My business address is 17230 NE Sacramento St., Gresham, OR 97230.
2. I prepared the following testimony and exhibits, which was filed in this proceeding on February 12, 2018:
 - a. LIUNA\100-LIUNA\106.
3. My Testimony and the Exhibits submitted therewith are true and accurate to the best of my knowledge. My testimony would be the same today as that reflected in my testimony already filed with the Commission in this proceeding.

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

Signed this 4th day of December, 2018 in Cannon Beach , Oregon.


CHAD FENISON

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DECLARATION OF AIDA ARANDA

I, AIDA ARANDA, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Aida Aranda. I am the Training Director of the Oregon & Southern Idaho Laborers-Employers Training Trust. My business address is 17242 NE Sacramento St., Portland OR 97230.
2. I prepared the following testimony and statements, which was filed in this proceeding on February 12, 2018:
 - a. LIUNA\200.
3. My Testimony submitted therewith is true and accurate to the best of my knowledge. My testimony would be the same today as that reflected in my testimony already filed with the Commission in this proceeding.

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

Signed this 4th day of December, 2018 in Portland, Oregon.



AIDA ARANDA

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DECLARATION OF GARY JACKSON

I, Gary Jackson, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Gary Jackson. I am the Senior Business Representative for LIUNA Local 737. My business address is 3081 Dole Rd., Myrtle Creek, OR 97457.
2. I prepared the following testimony and statements, which was filed in this proceeding on February 12, 2018 and then re-filed with an errata on February 14, 2018:
 - a. LIUNA\300-LIUNA\303.
3. My Testimony and the Statements submitted therewith are true and accurate to the best of my knowledge. My testimony would be the same today as that reflected in my testimony already filed with the Commission in this proceeding.

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

Signed this 4th day of December, 2018 in Myrtle Creek, Oregon.


GARY JACKSON

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