1						
2	BEFORE THE PUBLIC UTILITY COMMISSION					
3	OF OREGON					
4	UM 1953					
5	In the Matter of					
6 7	PORTLAND GENERAL ELECTRIC COMPANY, STAFF'S MOTION TO ADMIT PRE-FILED TESTIMONY & RESPONSE TO BENCH REQUEST					
8	Investigation into Proposed Green Tariff.					
9	Pursuant to OAR 860-001-0420(2), Staff of the Public Utility Commission of Oregon					
10	(Staff) files this motion to request that Administrative Law Judge Kirkpatrick admit the					
11	following pre-filed testimony and exhibits into the record in the above-captioned docket:					
12	• Staff/100-102 (Response Testimony and Exhibits of Lance Kaufman, adopted by Scott					
13	Gibbens)					
14	• Staff/200-201 (Cross-Answering Testimony and Exhibits of Scott Gibbens)					
15	• Staff's Reply to PGE's Response to Bench Request (sponsored by Scott Gibbens)					
16	This Motion to Admit Pre-Filed Testimony & Response to Bench Request is supported					
17	by the declaration of Staff witnesses Scott Gibbens that attests to the truthfulness of his					
18	testimony. The declaration is attached to this motion.					
19	DATED this 2018.					
20	Respectfully submitted,					
21	ELLEN F. ROSENBLUM Attorney General					
22	$\sim \sim \sim \sim \sim$					
2324	Sommer Moser, OSB # 105260 Assistant Attorney General					
25	Of Attorneys for Staff of the Public Utility Commission of Oregon					
26	Commission of Oregon					

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ST7/pjr/#9292066

1	BEFORE THE PUBLIC UTILITY COMMISSION					
2	OF OREGON					
3	UM 1953					
4	In the Matter of					
5 6	PORTLA COMPAN	ND GENERAL ELECTRIC NY,		DECLARATION OF SCOTT GIBBENS		
7	Investigation into Proposed Green Tariff					
8 9	I, SCOTT GIBBENS, declare under penalty of perjury under the laws of the state of					
10	Oregon:					
11	1. My name is Scott Gibbens. I am employed by the Public Utility Commission of					
12		Oregon as a Senior Economist in the	Energy Rates,	Finance and Audit Division.		
13	2.	On behalf of Staff of the Public Utilia	ty Commission	of Oregon (Staff), I drafted Cross-		
14		Answering Testimony in the above-c	aptioned docke	et pre-filed as Staff Exhibit 200 and		
15	my witness qualification statement, pre-filed as Staff Exhibit 201.					
16	3. On behalf of Staff, I adopt the testimony of former Staff employee Lance Kaufman,					
17	pre-filed as Staff Exhibits 100 and 102.					
18	4.	On behalf of Staff, I drafted Staff's R	eply to PGE's	Response to Bench Request, filed		
19		on November 13, 2018.				
20	5.	My pre-filed testimony and exhibits,	including adop	ted testimony, are true and accurate		
21		based on my knowledge and belief.				
22		I hereby declare that the above staten	nents are true to	o the best of my knowledge and		
23	belief, and that I understand it is made for use as evidence before the Public Utility					
24	Commission of Oregon and is subject to penalty for perjury.					
25	SIGNED this 26 day of November, 2018 at Salem, Oregon.					
26			G!1-	2 900		