## 1 BEFORE THE PUBLIC UTILITY COMMISSION **OF OREGON** 2 UM 2032 3 4 In the Matter of STAFF MOTION TO ADMIT EXHIBITS

5 PUBLIC UTILITY COMISSION OF OREGON,

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Investigation into the Treatment of Network 7 Upgrade Costs for Qualifying Facilities.

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9 Staff of the Oregon Public Utility Commission ("Staff"), moves to admit the following 10 prefile exhibits into the record in the above-captioned case.

11	Exhibit No.	Description
12	Exhibit No.	Description
13	100	Staff's Response Testimony of Caroline F. Moore
14	101	Witness Qualifications Statement of Caroline F. Moore
15	102	Idaho Power Company Responses to Data Requests
16	103	PacifiCorp Responses to Staff Data Requests
17	104	Portland General Electric Responses to Staff Data Requests
18	105	Network Upgrades Identified for Oregon Interconnection Requests
19	106	PacifiCorp Overview (Transmission System)
20	107	Excerpt NREL Atlas Solar Photovoltaic kWh/m²/Day and Wind Power Class – Onshore (Power Class/Potential)
21	200	Staff's Reply Testimony of Caroline F. Moore
22	300	Staff's Second Reply Testimony of Caroline F. Moore

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1	This motion is supported by the attached declaration of Caroline F. Moore attesting to the			
2	2 truthfulness of her testimony.			
3	3 SIGNED this 19 <sup>th</sup> day of January, 2023.	SIGNED this 19th day of January, 2023.		
4	4 Respectfully su	ıbmitted,		
5	Attorney Gene			
7		. Andrus		
8	Stephanie S. 1	ndrus, OSB No. 925123		
9	9 Sr. Assistant Attorney General Of Attorneys for Staff of the Public U	ttorney General or Staff of the Public Utility		
10	Commission of	f Oregon		
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON				
2	UM 2032				
4	In the Matter of	ı			
5		DECLARATION OF			
6	PUBLIC UTILITY COMISSION OF OREGON,	CAROLINE F. MOORE			
7	Investigation into the Treatment of Network				
8	Upgrade Costs for Qualifying Facilities.				
9	I, Caroline F. Moore, state the following, under	penalty of perjury in the State of Oregon:			
10	1. I am the Administrator of the Utility Strategy and Integration Division of the				
11	Public Utility Commission of Oregon.				
12	2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the				
13	above-captioned docket, pre-filed as Staff Exhibits 100, 200, and 300.				
14	3. To the best of my knowledge, my pre-filed testimony is true and accurate.				
15	I hereby declare that the above statement is true to the best of my knowledge and belief, and that				
16	I understand it is made for use as evidence in court and is subject to penalty for perjury.				
17	SIGNED this 19 <sup>th</sup> day of January, 2023.				
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19	/s/	Caroline F. Moore			
20	Ca	aroline F. Moore			
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