# BEFORE THE PUBLIC UTILITY COMMISSION

## **OF OREGON**

## **UM 2051**

FOSSIL LAKE SOLAR, LLC,	
COMPLAINANT,	FOSSIL LAKE SOLAR, LLC'S MOTION TO ADMIT PRE-FILED TESTIMONY
v.	
PORTLAND GENERAL ELECTRIC COMPANY,	
DEFENDANT.	
Fossil Lake Solar, LLC ("Fossil Lake") respectfully moves for the following pre-filed	
testimony and exhibits to be admitted into the record in this proceeding:	
<ul> <li>Declaration of David W. Brown in Support of Fossil Lake Solar, LLC's Motion for Summary Judgment dated May 19, 2020.</li> </ul>	
• Supplemental Declaration of David W. Brown in Support of Fossil Lake Solar, LLC's Cross Motion for Summary Judgment dated June 23, 2020.	
• Complaint/Exhibit A - Standard Renewable Off-System Variable Power Purchase Agreement, dated April 1, 2015.	
• Complaint/Exhibit B - PGE Termination Notice.	
• Complaint/Exhibit C – PGE Rejection Letter.	
/ / /	

/ / /

/ / /

This Motion is supported by the Affidavit of David W. Brown attesting that his prefiled testimony and exhibits are true and correct.

DATED this 7th day of July, 2020.

## **CABLE HUSTON LLP**

/s/ Richard G. Lorenz

Richard G. Lorenz, OSB No. 003086 1455 SW Broadway, Suite 1500 Portland, OR 97201 (503) 224-3092 (Telephone) (503) 224-3176 (Fax) rlorenz@cablehuston.com

Attorney for Fossil Lake Solar, LLC

### BEFORE THE PUBLIC UTILITY COMMISSION

### OF OREGON

#### UM 2051

FOSSIL LAKE SOLAR, LLC, COMPLAINANT,	AFFIDAVIT OF DAVID W. BROWN
v.	
PORTLAND GENERAL ELECTRIC COMPANY,	
DEFENDANT.	
STATE OF OREGON )	
County of Clackamas ) ss.	

- I, David W. Brown, being first duly sworn on oath, depose and say:
- 1. My name is David W. Brown. I am the Senior Principal of Fossil Lake Solar, LLC ("Fossil Lake").
- 2. I am the same David W. Brown that made the Declaration of David W. Brown in Support of Fossil Lake Solar, LLC's Motion for Summary Judgment dated May 19, 2020; and the Supplemental Declaration of David W. Brown in Support of Fossil Lake Solar, LLC's Cross Motion for Summary Judgment dated June 23, 2020.
- 3. Based on my information and belief, all of the matters stated in my Declaration and Supplemental Declaration are true and accurate.
- 4. Based on my information and belief, the following exhibits attached to the Complaint of Fossil Lake Solar, LLC are true and correct copies of the original documents:

- Complaint/Exhibit A Standard Renewable Off-System Variable Power
   Purchase Agreement, dated April 1, 2015;
- Complaint/Exhibit B PGE Termination Notice; and
- Complaint/Exhibit C PGE Rejection Letter
- 5. I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct.

SIGNED this 7th day of July, 2020 at Portland, Oregon.

DAVID W. BROWN

SUBSCRIBED AND SWORN to before me this 7th day of July, 2020.

Notary Public for Oregon

My Commission Expires:

OFFICIAL STAMP
Karyn Angelica Wexted-Moscoe
NOTARY PUBLIC-OREGON
COMMISSION NO. 970315
MY COMMISSION EXPIRES JANUARY 15, 2022