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March 25, 2021

Via Electronic Mail

Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, OR 97308-1088
puc.filingcenter@state.or.us

Re: OPUC Docket No. UM 2118

Attention Filing Center:

Attached for filing in the above-captioned docket is Sunthurst Energy, LLC's Motion to Admit Pre-Filed Testimony and Exhibits.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink that reads "Ken Kaufmann". The signature is written in a cursive style with a long horizontal line extending to the right.

Ken Kaufmann
Attorney for Sunthurst Energy, LLC

Attach.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

DOCKET NO. UM 2118

SUNTHURST ENERGY, LLC, an Oregon
limited liability company,

Complainant,

v.

PACIFICORP d/b/a Pacific Power, an
Oregon corporation,

Defendant

MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS

1 In accordance with OAR 860-001-0420, Sunthurst Energy, LLC (Sunthurst)
2 moves for the following to be admitted into the record in this proceeding:

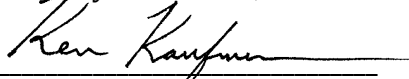
- 3 1. The pre-filed Opening Testimony and Exhibits of Daniel Hale on behalf of
4 Sunthurst (Sunthurst/100);
- 5 2. The pre-filed Opening Testimony and Exhibits of Michael Beanland, P.E., on
6 behalf of Sunthurst (Sunthurst/200-211);
- 7 3. The pre-filed Rebuttal Testimony and Exhibits of Daniel Hale on behalf of
8 Sunthurst (Sunthurst/300);
- 9 4. The pre-filed Rebuttal Testimony and Exhibits of Michael Beanland, P.E.,
10 on behalf of Sunthurst (Sunthurst/400-405);
- 11 5. The pre-filed Supplemental Exhibit Sunthurst/500; and
- 12 6. The pre-filed Confidential Supplemental Exhibit/501-CONFIDENTIAL.

13 This motion is supported by the declarations of Daniel Hale and Michael
14 Beanland, P.E., attesting that their pre-filed testimony and exhibits are true and
15 correct.

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Respectfully submitted this 25th day of March, 2021.

Respectfully submitted,

By: 
Kenneth E. Kaufmann, OSB 982672
Attorney for Sunthurst Energy, LLC

1 **BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

2 **DOCKET NO. UM 2118**

SUNTHURST ENERGY, LLC, an Oregon
limited liability company,

Complainant,

v.

PACIFICORP d/b/a Pacific Power, an
Oregon corporation,

Defendant

DECLARATION OF DANIEL HALE

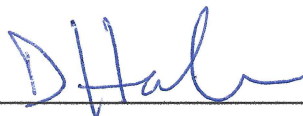
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4 I, DANIEL HALE, declare under penalty of perjury under the laws of the state
5 of Oregon:

- 6 1. My name is Daniel Hale. I am president and owner of Sunthurst Energy, LLC,
7 an Oregon company located at: 43682 SW Brower Lane, Pendleton, OR.
8 2. I am the same Daniel Hale who previously filed testimony on behalf of
9 Sunthurst in this matter (Sunthurst/100, 300).
10 3. My pre-filed testimony and exhibits are true and accurate based on my
11 information and belief.

12 I hereby declare that the above statement is true to the best of my knowledge
13 and belief, and that I understand it is made for use as evidence before the Public
14 Utility Commission of Oregon and is subject to penalty for perjury.

15 SIGNED this 25th day of March, 2021, at Glendora, California.

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17 Signed: _____



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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

DOCKET NO. UM 2118

SUNTHURST ENERGY, LLC, an Oregon
limited liability company,

Complainant,

v.

PACIFICORP d/b/a Pacific Power, an
Oregon corporation, Defendant

DECLARATION OF

MICHAEL BEANLAND

I, MICHAEL BEANLAND, declare under penalty of perjury under the laws of
the state of Oregon:

- 1. My name is Michael David Beanland. I am president and owner of Willamette Power Engineering, Inc., a Washington company located at: 11616 NE 7th Cir, Vancouver, WA 98684.
- 2. I am the same Michael Beanland who previously filed testimony on behalf of Sunthurst in this matter (Sunthurst/200, 400).
- 3. My pre-filed testimony and exhibits are true and accurate based on my information and belief.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

SIGNED this 24th day of March 2021, at Portland, Oregon.

Signed: 