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5 BEFORE THE STATE OF WASHINGTON
6 ENERGY FACILITY SITING EVALUATION COUNCIL

7 In the Matter of the Application of:

DOCKET NO. EF-210011

8 Scout Clean Energy, LLC, for
9 Horse Heaven Wind Farm, LLC,
10 Applicant.

DECLARATION OF CAROL COHOE IN
SUPPORT OF REPLY IN SUPPORT
JOINT MOTION TO STRIKE
APPLICANT'S DIRECT TESTIMONY

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12 I, CAROL COHOE declare as follows:

- 13 1. I am a legal assistant at the Law Offices of J. Richard Aramburu, over the age
14 of eighteen years and competent to testify.
- 15 2. I assisted in the preparation, review, formatting, labelling, and issuing in
16 searchable PDF format of the various witness identification statements, Pre-
17 Filed Testimony (PFT) and exhibits, working diligently with multiple witnesses
18 and clients to meet the filing and service deadline of 5:00 p.m. June 12, 2023.
19 That work included the PFT and exhibits for about 35 witnesses, more than 50
20 documents.
- 21 3. All witnesses signed electronically after confirming to TCC their understanding
22 that they were making sworn testimony, agreeing to the use of their testimony
23 with the perjury statement in their witness identification statement, and
24 agreeing to be called for in-person testimony.
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26

- 1 4. A filing and service email was sent to the parties at 4:50 PM on June 12, with a
2 Dropbox link for download of TCC's individually prepared and labeled PDFs.
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4 5. Following that service, I returned to other work until notified that there were
5 certain errors in the filing, which we then corrected by:
6 a. Conducting review of documents uploaded in the original June 12 filing,
7 advising the parties of certain labelling errors and providing correctly
8 labeled replacements for three documents mislabeled in the original
9 timely filing.
10 b. Advising the parties that certain exhibits, though included in our exhibit
11 list (EXH-5001_T), were being reserved because they did not upload to
12 the Dropbox and therefore were not timely served. We did not attempt
13 late service of those exhibits.
14
15 6. Mr. Aramburu's confidentiality agreement was signed and provided to Ms.
16 Voelckers on June 16, 2023, after which on the next business day we were
17 provided with her unredacted documents.
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19 7. Despite the limited time available under the schedule, far fewer staffing
20 resources and problems with upload that forced reservation of certain exhibits
21 for later timely filing, TCC was able to timely file and serve before the 5:00 PM
22 June 12, 2023 deadline. Though a few formatting errors have been identified,
23 all materials were provided to the parties prior to the deadline.

24 I declare under penalty of perjury of the laws of the State of Washington that
25 the foregoing is true and correct.

26 Dated this 21st day of June, 2023, in Seattle, Washington.

_____/s/_____
Carol Cohoe, Legal Assistant
Law Offices of J. Richard Aramburu, PLLC