

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1209

In the Matter of)	
)	
MIDAMERICAN ENERGY HOLDINGS COMPANY)	MOTION TO ADMIT TESTIMONY OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
)	
Application for Authorization to Acquire Pacific Power & Light, dba PacifiCorp.)	
_____)	

Pursuant to the ALJ's January 18, 2006 Memorandum, Industrial Customers of Northwest Utilities ("ICNU") moves that the testimony and exhibits of Ken Canon (ICNU/100-105), Michael Gorman (ICNU/200-204), and Lincoln Wolverton (ICNU/300-301) be admitted into the record in this proceeding. Along with this Motion, ICNU is filing affidavits from each of its witnesses attesting that the testimony is true and correct.

Dated this 19th day of January, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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Of Attorneys for Industrial Customers
of Northwest Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1209

In the Matter of)	
)	AFFIDAVIT OF KEN CANON
MIDAMERICAN ENERGY HOLDINGS)	
COMPANY)	
)	
Application for Authorization to Acquire)	
Pacific Power & Light, dba PacifiCorp.)	
_____)	

1 I, Ken Canon, being first duly sworn on oath, depose and say:

2 1. My full name is Ken Canon. I am a partner in the law firm of Canon and Hutton.
3 I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities
4 (“ICNU”). My business address is: 13400 S. Myrtle, Myrtle Creek, OR 97457.

5 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public
6 Utility Commission (“OPUC” or the “Commission”) Docket No. UM 1209. Specifically, my
7 pre-filed direct testimony and exhibits were filed on November 21, 2005.

8 3. My testimony and exhibits that were previously filed are true and accurate, and no
9 corrections need to be made. If I were asked the same questions today, my answers would be the
10 same.

1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 15th day of January, 2006, at Myrtle Creek, Oregon.

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KEN CANON

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1209

In the Matter of)
)
MIDAMERICAN ENERGY HOLDINGS)
COMPANY)
)
Application for Authorization to Acquire)
Pacific Power & Light, dba PacifiCorp.)
_____)

AFFIDAVIT OF MICHAEL GORMAN

1 I, Michael Gorman, being first duly sworn on oath, depose and say:

2 1. My full name is Michael P. Gorman. I am a consultant in the field of public
3 utility regulation and a principal in the firm of Brubaker & Associates, Inc., energy, economic,
4 and regulatory consultants. I am appearing in this proceeding as a witness for the Industrial
5 Customers of Northwest Utilities (“ICNU”). My business address is: 1215 Fern Ridge Parkway,
6 Suite 208, St. Louis, MO 63141-2000.

7 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public
8 Utility Commission (“OPUC” or the “Commission”) Docket No. UM 1209. Specifically, my
9 pre-filed direct testimony and exhibits were filed on November 21, 2005.

10 3. My testimony and exhibits that were previously filed are true and accurate, and no
11 corrections need to be made. If I were asked the same questions today, my answers would be the
12 same.

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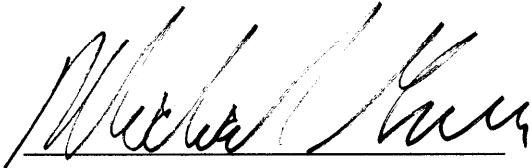
1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 13th day of January, 2006, at St. Louis, Missouri.

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A handwritten signature in black ink, appearing to read "Michael Gorman", is written over a horizontal line. The signature is cursive and somewhat stylized.

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MICHAEL GORMAN

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1209

In the Matter of)

MIDAMERICAN ENERGY HOLDINGS)
COMPANY)

Application for Authorization to Acquire)
Pacific Power & Light, dba PacifiCorp.)

) **AFFIDAVIT OF LINCOLN WOLVERTON**

1 I, Lincoln Wolverton, being first duly sworn on oath, depose and say:

2 1. My full name is Lincoln Wolverton. I am the owner and principal consultant of
3 East Fork Economics. I am appearing in this proceeding as a witness for the Industrial
4 Customers of Northwest Utilities ("ICNU"). My business address is: P.O. Box 620, La Center,
5 WA 98629.

6 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public
7 Utility Commission ("OPUC" or the "Commission") Docket No. UM 1209. Specifically, my
8 pre-filed direct testimony and exhibits were filed on November 21, 2005.

9 3. My testimony and exhibits that were previously filed are true and accurate, and no
10 corrections need to be made. If I were asked the same questions today, my answers would be the
11 same.

1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 17th day of January, 2006, at La Center, Washington.

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LINCOLN WOLVERTON

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1209

In the Matter of)
)
MIDAMERICAN ENERGY HOLDINGS)
COMPANY)
)
Application for Authorization to Acquire)
Pacific Power & Light, dba PacifiCorp.)
_____)

AFFIDAVIT OF MICHAEL EARLY

1 I, Michael Early, being first duly sworn on oath, depose and say:

2 1. My full name is Michael B. Early. I am the Executive Director of the Industrial
3 Customers of Northwest Utilities (“ICNU”). I am appearing in this proceeding as a witness for
4 ICNU. My business address is: 333 S.W. Taylor, Suite 400, Portland, Oregon 97204.

5 2. I co-sponsored on behalf of ICNU the Joint Testimony in Support of the
6 Stipulation filed on December 23, 2005, in Oregon Public Utility Commission (“OPUC” or the
7 “Commission”) Docket No. UM 1209.

8 3. My testimony and exhibits that were previously filed are true and accurate, and no
9 corrections need to be made. If I were asked the same questions today, my answers would be the
10 same.

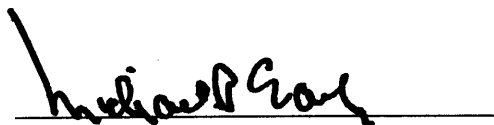
1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 17th day of January, 2006, at Portland, Oregon.

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A handwritten signature in black ink, appearing to read "Michael Early", is written over a horizontal line.

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MICHAEL EARLY

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January 19, 2006

Via Electronic and US Mail

Public Utility Commission
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550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of MIDAMERICAN ENERGY HOLDINGS COMPANY
Application for Authorization to Acquire Pacific Power & Light, dba PacifiCorp
Docket No. UM 1209

Dear Filing Center:

Enclosed please find original and two copies each of the Motion to Admit Testimony of the Industrial Customers of Northwest Utilities in the above-referenced docket. Also enclosed is the Affidavit of Michael Early.

Please return one file-stamped copy of each document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely,

/s/ Anna E. Studenny
Anna E. Studenny

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Motion to Admit Testimony of the Industrial Customers of Northwest Utilities upon the parties on the service list by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

Dated at Portland, Oregon, this 19th day of January, 2006.

/s/ Anna E. Studenny
Anna E. Studenny

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