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March 14, 2007

***Via Electronic and U.S. Mail***

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Deferred  
Accounting Authorization for certain Expenses/Revenue Refunds Associated with  
SB 408 and the Sale of Certain Non-utility Assets  
**Docket No. UM 1271**

Dear Filing Center:

Enclosed please find the Affidavit of Michael Early and the Motion to Admit the  
Direct Testimony of Michael B. Early on behalf of the Industrial Customers of Northwest  
Utilities in the above-referenced matter.

Thank you for your assistance.

Sincerely,

/s/ Christian Griffen  
Christian W. Griffen

Enclosures  
cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Direct Testimony of Michael B. Early on behalf of the Industrial Customers of Northwest Utilities upon the parties on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid.

Dated at Portland, Oregon, this 14th day of March, 2007.

/s/ Christian Griffen  
Christian W. Griffen

**CITIZENS' UTILITY BOARD OF OREGON**

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**DEPARTMENT OF JUSTICE**

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1271**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	MOTION TO ADMIT TESTIMONY AND EXHIBITS OF ICNU
	)	
Application for Deferred Accounting of Certain Revenue Refunds Associated with Senate Bill 408.	)	
	)	

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Pursuant to Administrative Law Judge Hayes’ March 8, 2007 Prehearing Conference Report, the Industrial Customers of Northwest Utilities (“ICNU”) moves that the prefiled testimony and exhibits of Michael B. Early (ICNU/100-101) be admitted into the record in this proceeding:

Along with this Motion, ICNU is filing an affidavit executed by Mr. Early attesting that the prefiled testimony and exhibits are true and correct.

WHEREFORE, ICNU requests that this Motion to Admit Testimony and Exhibits be granted.

Dated this 14th day of March, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Matthew Perkins

S. Bradley Van Cleve

Matthew W. Perkins

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Of Attorneys for Industrial Customers  
of Northwest Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1271**

In the Matter of )  
 )  
 )  
PORTLAND GENERAL ELECTRIC ) AFFIDAVIT OF MICHAEL B. EARLY  
COMPANY )  
 )  
Application for Deferred Accounting of )  
Certain Revenue Refunds Associated with )  
Senate Bill 408. )

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

2 1. My name is Michael B. Early. I am the Executive Director for the Industrial  
3 Customers of Northwest Utilities (“ICNU”). My business address is: 333 S.W. Taylor St.,  
4 Suite 400, Portland, OR 97204.

5 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public  
6 Utility Commission Docket No. UM 1271. Specifically, my pre-filed direct testimony and  
7 exhibits, ICNU/100-101, were filed on January 22, 2007.

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 AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 13th day of March, 2007, at Portland, Oregon.

5 *State of Oregon*  
6 *County of Multnomah*  
7 *Michael B. Early*

8 Michael B. Early

9 SUBSCRIBED AND SWORN to before me this 13th day of March, 2007.

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*Ruth A. Miller*  
NOTARY PUBLIC FOR OREGON

My Commission Expires: 11/6/2010