Portland General Electric Company

Legal Department 121 SW Salmon Street • Portland, Oregon 97204 (503) 464-8926 • Facsimile (503) 464-2200 **Douglas C. Tingey**Assistant General Counsel

October 9, 2008

Via Electronic Filing and US Mail

Oregon Public Utility Commission Attention: Filing Center 550 Capitol Street NE, #215 PO Box 2148 Salem OR 97308-2148

Re: UE 197

Attention Filing Center:

Enclosed for filing in UE 197 are an original and one copy of:

• MOTION TO ADMIT TESTIMONY (with Affidavits).

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

DOUGLAS C. TINGEY

DCT:jbf Enclosures

cc: Service List-UE 197

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **MOTION TO ADMIT TESTIMONY (WITH AFFIDAVITS)** to be served by electronic mail to those parties whose email addresses appear on the attached service list and by method specified, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UE 197.

Dated at Portland, Oregon, this 9th day of October, 2008.

DOUGLAS C. TINGEY, OSB # 044366

Assistant General Counsel

Portland General Electric Company

121 SW Salmon St., 1WTC1301

Portland, OR 97204

(503) 464-8926 (telephone)

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SERVICE LIST - OPUC DOCKET # UE 197				
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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

	UE 197	
In the Matter of)	
PORTLAND GENERAL ELECTRIC COMPANY) MOTION TO) ADMIT TESTI	MONY
Request for a General Rate Revision)))	

Portland General Electric Company moves that the following pre-filed testimony and exhibits be admitted into the record of this proceeding:

Testimony	Witness(es)	
PGE/100-101	James J. Piro	
PGE/200-210	Alex Tooman	
	Jay Tinker	
PGE/300	Jay Tinker	
	Michael A. Niman	
PGE/400-403	Stephen Quennoz	
	Jim Lobdell	
PGE/500-501	James J. Piro	
	Alex Tooman	
PGE/600	Stephen Hawke	
PGE/700	Stephen Hawke	
PGE/800-802	Arleen Barnett	
	Joyce Bell	
PGE/900-904	Patrick G. Hager	
	Kristin A. Stathis	
PGE/1000-1016	Thomas M. Zepp	
PGE/1100-1110	Ham T. Nguyen	
PGE/1200-1208	Doug Kuns	
	Marc Cody	
PGE/1300-1302	James J. Piro	
PGE/1400-1406,	Alex Tooman	
1407C, 1408, 1409C,	Jay Tinker	
1410-1411, 1412C,		
1413, 1414C		

Testimony	Witness(es)	
PGE/1500-1501,	Arleen Barnett	
1502C, 1503, 1504C,	Joyce Bell	
1505-1507		
PGE/1600-1601,	Stephen Hawke	
1602C, 1603C,		
1604C, 1605		
PGE/1700-1706	Stephen Hawke	
PGE/1800, 1801C,	Stephen Quennoz	
1802		
PGE/1900-1903	James. J. Piro	
	Alex Tooman	
PGE/2000-2008	Doug Kuns	
	Marc Cody	
	Michaela Lynn	
PGE/2100	Ralph Cavanagh	
PGE/2200-2205	James J. Piro	
PGE/2300-2310	Alex Tooman	
	Jay Tinker	
PGE/2400-2405	Arleen Barnett	
	Joyce Bell	
PGE/2500-2501	Stephen Hawke	
PGE/2600-2601,	Stephen Quennoz	
2602C		
PGE/2700-2701,	James J. Piro	
2702C, 2703C,	Alex Tooman	
2704C, 2705-2707		
PGE/2800-2801	Doug Kuns	
	Marc Cody	
	Michaela Lynn	
PGE/2900	Ralph Cavanagh	

The affidavits of the above persons attesting to the truth and accuracy of the testimony and exhibits are attached, with the exception of Joyce Bell and Arleen Barnett. Ms. Bell is expected to testify at the hearing and will attest to the aforementioned testimony at that time.

Original affidavits are being filed with this motion except for Ralph Cavanagh, who has provided

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a faxed copy. PGE will file the original with the OPUC Filing Center upon receipt.

DATED this 9th day of October, 2008.

Respectfully submitted,

/s/ DOUGLAS C. TINGEY

Douglas C. Tingey, OSB No. 044366 Assistant General Counsel Portland General Electric Company 121 SW Salmon Street, 1WTC1301 Portland, Oregon 97204 (503) 464-8351 phone (503) 464-2200 fax doug.tingey@pgn.com

OF OREGON

	UE 197	
in the Matter of PORTLAND GENERAL ELECTRIC COMPANY)))	AFFIDAVIT OF RALPH CAVANAGH
Request for a General Rate Revision)))	

- I, Ralph Cavanagh, being first duly sworn on oath, depose and say:
- 1. My full name is Ralph Cavanagh. I am Energy Program Co-Director for the Natural Resources Defense Council, 111 Sutter Street, 20th Floor, San Francisco, CA 94104.
 - 2. I filed testimony (PGE/2100 and PGE/2900) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this ____ day of October, 2008.

SUBSCRIBED AND SWORN to before me this ___ day of October, 2008.

ANDREA MARTIN Commission # 1739689

My Commission Expires:

OF OREGON

UE 197			
In the Matter of	AFFIDAVIT OF MARC CODY		
I, Marc Cody, being first duly sworn on oath, depose a	and say:		
1. My full name is Marc Cody. I am Seni	or Analyst in Pricing and Tariffs for		
Portland General Electric ("PGE").			
2. I filed testimony and associated exhibit	s (PGE/1200-1208, PGE/2000-2008, and		
PGE/2800-2801) on behalf of PGE in this matter.			
3. PGE/2000, page 12, line 22, should be	PGE/2000, page 12, line 22, should be corrected to read (starting on line 21):		
"However, the ratio of the highest to the lowest hourly	price within MONET is approximately		
4.8 (\$97.45 to \$20.47), " The testimony as original	ally filed contained different numbers. This		
correction was identified in PGE's response to ICNU	Data Request 281, sent on September 3,		
2008.			
4. With that correction, to the best of my	knowledge, my pre-filed testimony and		
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exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 7 day of October, 2008.

Marc Cody MARC CODY

SUBSCRIBED AND SWORN to before me this 7^{ex} day of October, 2008.

OFFICIAL SEAL
CORY MC ALISTER
NOTARY PUBLIC-OREGON COMMISSION NO. 417179 MY COMMISSION EXPIRES MAY 8, 2011 Notary Public for Oregon
My Commission Expires: 5-8-2011

OF OREGON

	UE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY)))	AFFIDAVIT OF PATRICK G. HAGER
Request for a General Rate Revision)))	

- I, Patrick G. Hager, being first duly sworn on oath, depose and say:
- 1. My full name is Patrick G. Hager. I am Manager of Regulatory Affairs at Portland General Electric ("PGE").
 - 2. I filed testimony (PGE/900-904) on behalf of PGE in this matter.
- To the best of my knowledge, my pre-filed testimony is true and accurate. If I 3. were asked the same questions today, my answers would be the same.

SIGNED this 7th day of October, 2008.

SUBSCRIBED AND SWORN to before me this 7th day of October, 2008.

OFFICIAL SEAL CORY MC ALISTER NOTARY PUBLIC-OREGON MY COMMISSION EXPIRES MAY 8, 2011

Notary Public for Oregon
My Commission Expires: 5-8-2011

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

	UE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY)))	AFFIDAVIT OF STEPHEN HAWKE
Request for a General Rate Revision)))	

- I, Stephen Hawke, being first duly sworn on oath, depose and say:
- 1. My full name is Stephen Hawke. I am Vice-President of Customer Service and Delivery at Portland General Electric ("PGE").
- 2. I filed testimony and associated exhibits (PGE/600, PGE/700, PGE/1600-1601, PGE/1602C, PGE/1603C, PGE/1604C, PGE/1605, PGE/1700-1706, and PGE/2500-2501) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this S day of October, 2008.

STEPHEN HAWKE

SUBSCRIBED AND SWORN to before me this <u>g</u>^{2t} day of October, 2008.

	OFFICIAL SEAL CORY MC ALISTER NOTARY PUBLIC-OREGON COMMISSION NO. 417179	
	COMMISSION NO. 417179	
_	MY COMMISSION EXPIRES MAY 8, 2	011

an mater	
Notary Public for Oregon	
My Commission Expires:	

OF OREGON

	٦	UE 197
COMPANY	of GENERAL ELECTRIC General Rate Revision)) AFFIDAVIT OF) DOUGLAS KUNS))
I, Douglas K	uns, being first duly sworn on oa	ath, depose and say:
1.	My full name is Douglas Kuns	s. I am Manager of the Pricing and Tariffs
Department v	within the Rates and Regulatory	Affairs Department for Portland General Electric
("PGE").	,	
2.	I filed testimony and associate	ed exhibits (PGE/1200-1208, PGE/2000-2008, and
PGE/2800-28	801) on behalf of PGE in this ma	utter.
3.	PGE/2000, page 12, line 22, sl	hould be corrected to read (starting on line 21):
"However, th	ne ratio of the highest to the lowe	est hourly price within MONET is approximately
4.8 (\$97.45 to	o \$20.47), " The testimony a	as originally filed contained different numbers. This
correction wa	as identified in PGE's response t	to ICNU Data Request 281, sent on September 3,
2008.		
Δ	With that correction to the be-	st of my knowledge, my pre-filed testimony and

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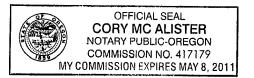
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exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 7+ day of October, 2008.

DOUGLAS KUNS

SUBSCRIBED AND SWORN to before me this 7th day of October, 2008.



Notary Public for Oregon
My Commission Expires: 5-5-2011

OF OREGON

	UE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY)))	AFFIDAVIT OF JIM LOBDELL
Request for a General Rate Revision))	

I, Jim Lobdell, being first duly sworn on oath, depose and say:

- 1. My full name is Jim Lobdell. I am Vice-President of Power Operations and Resource Supply at Portland General Electric ("PGE").
 - 2. I filed testimony (PGE/400-403) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this <u>\$\mathcal{S}\$</u> day of October, 2008.

SUBSCRIBED AND SWORN to before me this gradual of October, 2008.

OFFICIAL SEAL CORY MC ALISTER NOTARY PUBLIC-OREGON COMMISSION NO. 417179 MY COMMISSION EXPIRES MAY 8, 2011

My Commission Expires: See 2011

OF OREGON

		JE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision)) AFFIDAVIT OF) MICHAELA LYNN))	
I, Michaela I	Lynn, being first duly sworn on	ath, depose and say:	
1.	My full name is Michaela Lynn. I am Manager of Credit and Collections at		
Portland Ger	neral Electric ("PGE").		
2.	I filed testimony and associated exhibits (PGE/2000-2008, and PGE/2800-2801)		
on behalf of	PGE in this matter.		
3.	PGE/2000, page 12, line 22,	nould be corrected to read (starting on	line 21):
"However, tl	ne ratio of the highest to the low	st hourly price within MONET is appr	oximately
4.8 (\$97.45 t	o \$20.47), " The testimony	s originally filed contained different n	umbers. This
correction w	as identified in PGE's response	o ICNU Data Request 281, sent on Sep	ptember 3,
2008.			
4.	With that correction, to the bo	et of my knowledge, my pre-filed testing	nony and

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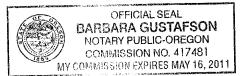
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exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this _____day of October, 2008.

SUBSCRIBED AND SWORN to before me this garday of October, 2008.



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Notary Public for Oregon

My Commission Expires: May 16, 2011

OF OREGON

	UE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY)))	AFFIDAVIT OF HAM T. NGUYEN
Request for a General Rate Revision))	

- I, Ham T. Nguyen, being first duly sworn on oath, depose and say:
- 1. My full name is Ham T. Nguyen. I am Senior Economist at Portland General Electric ("PGE").
 - 2. I filed testimony (PGE/1100-1110) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 6 day of October, 2008.

SUBSCRIBED AND SWORN to before me this $\underline{6}^{\tau t}$ day of October, 2008.

OFFICIAL SEAL CORY MC ALISTER NOTARY PUBLIC-OREGON COMMISSION NO. 417179 MY COMMISSION EXPIRES MAY 8, 2011

Notary Public for Oregon
My Commission Expires: 5/8/2011

OF OREGON

	UE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY)))	AFFIDAVIT OF MICHAEL A. NIMAN
Request for a General Rate Revision)	

- I, Michael A. Niman, being first duly sworn on oath, depose and say:
- 1. My full name is Michael A. Niman. I am Manager of Financial Analysis at Portland General Electric ("PGE").
 - 2. I filed testimony (PGE/300) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same, with the following exception regarding Colstrip's non-running station service load:

PGE 300, page 10, lines 9-11 states, "The cost to supply non-running station service load, whether by backfeed, direct interconnection, or other means, is part of PGE's cost of providing service and is not reflected elsewhere in PGE's 2009 test year revenue requirement...."

Upon further research in June 2008, we discovered that at least a portion of Colstrip's non-running station service load might already be reflected in our current modeling of Colstrip's ////

net plant heat rate. I would revise my answer to reflect this if asked the question today. PGE's subsequent filings in UE 198 have incorporated this fact.

SIGNED this 7th day of October, 2008.

Mulul a Viina MICHAEL A. NIMAN

SUBSCRIBED AND SWORN to before me this 7th day of October, 2008.



Notary Public for Oregon
My Commission Expires: 5-8-2011

OF OREGON

UE	197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY)) AFFIDAVIT OF) KRISTIN A. STATHIS)	
Request for a General Rate Revision)		
I, Kristin A. Stathis, being first duly sworn on oa	th, depose and say:	
1. My full name is Kristin A. Stathis	s. I am Assistant Treasurer, Corporate Finance,	
at Portland General Electric ("PGE").		
2. I filed testimony (PGE/900-904) of	on behalf of PGE in this matter.	

To the best of my knowledge, my pre-filed testimony is true and accurate. If I

were asked the same questions today, my answers would be the same.

Malket

3.

SUBSCRIBED AND SWORN to before me this ____aday of October, 2008.

OFFICIAL SEAL
CORY MC ALISTER
NOTARY PUBLIC-OREGON
COMMISSION NO. 417179
MY COMMISSION EXPIRES MAY 8, 2011

Notary Public for Oregon
My Commission Expires: 5-8-2011

OF OREGON

	UE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision)))))	AFFIDAVIT OF JAY TINKER

I, Jay Tinker, being first duly sworn on oath, depose and say:

- 1. My full name is Jay Tinker. I am a Project Manager at Portland General Electric ("PGE").
- I filed testimony and associated exhibits (PGE/200-210, PGE/300, PGE/1400-1406, PGE/1407C, PGE/1408, PGE/1409C, PGE/1410-1411, PGE/1412C, PGE/1413, PGE/1414C, and PGE/2300-2310) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same, with the following exception regarding Colstrip's non-running station service load:

PGE 300, page 10, lines 9-11 states, "The cost to supply non-running station service load, whether by backfeed, direct interconnection, or other means, is part of PGE's cost of providing service and is not reflected elsewhere in PGE's 2009 test year revenue requirement...."

Upon further research in June 2008, we discovered that at least a portion of Colstrip's non-running station service load might already be reflected in our current modeling of Colstrip's

net plant heat rate. I would revise my answer to reflect this if asked the question today. PGE's subsequent filings in UE 198 have incorporated this fact.

SIGNED this 1 day of October, 2008.

JAY TINKER

SUBSCRIBED AND SWORN to before me this $\frac{7^{cl}}{}$ day of October, 2008.



Notary Public for Oregon
My Commission Expires: 5-2-2011

OF OREGON

	UE 197		
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision)) AFFIDAVIT OF) ALEX TOOMAN))		
I, Alex Tooman, being first duly sworn on o	ath, depose and say:		
1. My full name is Alex Tooma	n. I am a Project Manager at Portland General		
Electric ("PGE").			
2. I filed testimony and associate	ted exhibits (PGE/200-210, PGE/500-501,		
PGE/1400-1406, PGE/1407C, PGE/1408, P	GE/1409C, PGE/1410-1411, PGE/1412C,		
PGE/1413, PGE/1414C, PGE/1900-1903, P	GE/2300-2310, PGE/2700-2701, PGE/2702C,		
PGE/2703C, PGE/2704C, and PGE/2705-2	707) on behalf of PGE in this matter.		
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and			
accurate. If I were asked the same questions	s today, my answers would be the same.		
SIGNED this <u>(a)</u> day of October, 20	008.		
ALEX TOOMAN			
SUBSCRIBED AND SWORN to be	efore me this <u>6</u> day of October, 2008.		
OFFICIAL SEAL CORY MC ALISTER NOTARY PUBLIC-OREGON COMMISSION NO. 417179 MY COMMISSION EXPIRES MAY 8, 2011	Notary Public for Oregon My Commission Expires: 5/2/2011		

OF OREGON

	UE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision)))))	AFFIDAVIT OF JAMES J. PIRO

- I, James J. Piro, being first duly sworn on oath, depose and say:
- 1. My full name is James J. Piro. I am Executive Vice-President, Finance, Chief Financial Officer and Treasurer of Portland General Electric ("PGE").
- 2. I filed testimony and associated exhibits (PGE/100-101, PGE/500-501, PGE/1300-1302, PGE/1900-1903, PGE/2200-2205, PGE/2700-2701, PGE/2702C, PGE/2703C, PGE/2704C, and PGE/2705-2707) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 7 day of October, 2008.

SUBSCRIBED AND SWORN to before me this 7 day of October, 2008.

Notary Public for Oregon
My Commission Expires: (October 20, 2010)

OF OREGON

	UE 197	
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY)))	AFFIDAVIT OF STEPHEN QUENNOZ
Request for a General Rate Revision)))	

- I, Stephen Quennoz, being first duly sworn on oath, depose and say:
- 1. My full name is Stephen Quennoz. I am Vice-President, Power Supply, at Portland General Electric ("PGE").
- 2. I filed testimony and associated exhibits (PGE/400-403, PGE/1800, PGE/1801C, PGE/1802, PGE/2600-2601, and PGE/2602C) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this OB day of October, 2008.

SUBSCRIBED AND SWORN to before me this $2 \mod 1$ day of October, 2008.

MY COMMISSION EXPIRES OCTOBER 20, 2010

Notary Public for Oregon
My Commission Expires: Offsber 20, 2010

OF OREGON

UE 197 In the Matter of PORTLAND GENERAL ELECTRIC AFFIDAVIT OF **COMPANY** THOMAS M. ZEPP Request for a General Rate Revision

- I, Thomas M. Zepp, being first duly sworn on oath, depose and say:
- 1. My full name is Thomas M. Zepp. I am an Economist and Vice President of Utility Resources, Inc., Suite 250, 1500 Liberty Street, S.E., Salem, OR 97302.
 - 2. I filed testimony (PGE/1000-1016) on behalf of PGE in this matter.
- 3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 6 day of October, 2008.

SUBSCRIBED AND SWORN to before me this lo day of October, 2008.

OFFICIAL SEAL

Notary Public for Oregon

My Commission Expires: 8-16-12