

# Davison Van Cleve PC

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com

Suite 400  
333 SW Taylor  
Portland, OR 97204

November 4, 2009

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NOV 09 2009

Public Utility Commission of Oregon  
Administrative Hearing Division

*Via Electronic and US 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 PACIFICORP Request for a General Rate Revision  
**Docket No. UE 210**

Dear Filing Center:

Enclosed please find the Motion to Admit Prefiled Testimonies and Exhibits on behalf of the Industrial Customers of Northwest Utilities ("ICNU") and the Citizens' Utility Board ("CUB"). Additionally, please find the Affidavits of Randall Falkenberg, Ellen Blumenthal, Michael Gorman, Donald Schoenbeck, and Michael Early on behalf of the ICNU and the Affidavits of Ellen Blumenthal and Michael Gorman on behalf of ICNU and CUB in the above-referenced docket.

Thank you for your assistance.

Sincerely yours,

  
Allison M. Wils

Enclosures

cc: Service List

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

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UE 210

In the Matter of )  
PACIFICORP ) INDUSTRIAL CUSTOMERS OF  
Request for a General Rate Revision ) NORTHWEST UTILITIES AND CITIZENS'  
 ) UTILITY BOARD MOTION TO ADMIT  
 ) PREFILED TESTIMONIES AND EXHIBITS  
 )

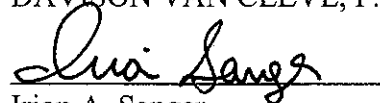
Public Utility Commission of Oregon  
Administrative Hearing Division

The Industrial Customers of Northwest Utilities ("ICNU") hereby moves that the prefiled testimonies and exhibits of Randall J. Falkenberg, Donald Schoenbeck, Michael Early, Ellen Blumenthal, and Michael Gorman submitted on behalf of ICNU be admitted to the record. Additionally, ICNU and the Citizens' Utility Board ("CUB") hereby move that the prefiled opening testimonies and exhibits of Ellen Blumenthal and Michael Gorman submitted on behalf of ICNU and CUB be admitted to the record. CUB has authorized ICNU to make this filing on its behalf. The aforementioned ICNU and CUB witnesses' affidavits were filed on November 4, 2009, with the Oregon Public Utility Commission. Finally, ICNU moves for the admission of a posthearing exhibit, ICNU/603.

Dated this 4th day of November, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



Irion A. Sanger  
333 S.W. Taylor, Suite 400  
Portland, Oregon 97204  
(503) 241-7242 telephone  
(503) 241-8160 facsimile  
mail@dvclaw.com  
Of Attorneys for Industrial Customers  
of Northwest Utilities

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

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NOV 08 2009

UE 210

In the Matter of )  
)  
PACIFIC POWER & LIGHT )  
(dba PACIFICORP) )  
)  
Request for a General Rate Revision )

Public Utility Commission of Oregon  
Administrative Hearing Division

AFFIDAVIT OF RANDALL J.  
FALKENBERG

I, Randall J. Falkenberg, being first duly sworn on oath, depose and say:

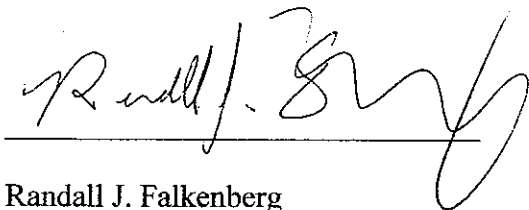
1. My name is Randall J. Falkenberg. I am a utility rate and planning consultant holding the position of President and Principal with the firm of RFI Consulting, Inc. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU"). My business address is: PMB 362, 8343 Roswell Road, Sandy Springs, Georgia 30350.

2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 210. Specifically, my pre-filed Opening Testimony and exhibits, ICNU/100-104, were filed on July 24, 2009.

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

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 AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 3 day of November, 2009, at Sandy Springs, Georgia.

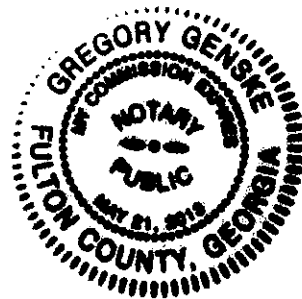


Randall J. Falkenberg

SUBSCRIBED AND SWORN to before me this 3 day of November, 2009.

  
NOTARY PUBLIC FOR GEORGIA

My Commission Expires: 5/21/2013



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

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NOV 09 2009

UE 210

Public Utility Commission of Oregon  
Administrative Hearing Division

In the Matter of )  
)  
PACIFIC POWER & LIGHT ) AFFIDAVIT OF DONALD  
(dba PACIFICORP) ) SCHOENBECK  
)  
Request for a General Rate Revision )

I, Donald Schoenbeck, being first duly sworn on oath, depose and say:

1. My name is Donald Schoenbeck. I am a member of Regulatory & Cogeneration Services, Inc. ("RCS"), a utility rate and economic consulting firm. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU"). My business address is: 900 Washington Street, Suite 780, Vancouver, WA 98660.

2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 210. Specifically, my pre-filed Opening Testimony and exhibits, ICNU/200-208, were filed on July 24, 2009. Lastly, I filed Joint Testimony in support of the Rate Spread and Rate Design Stipulation, Joint-Rate Spread and Rate Design/100/Compton, et al., on September 25, 2009.

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

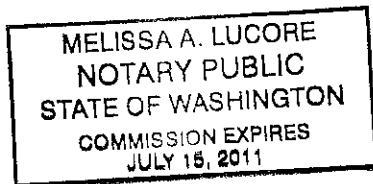
I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 2nd day of November, 2009, at Vancouver, Washington.

Donald W. Schoenbeck

Donald Schoenbeck

SUBSCRIBED AND SWORN to before me this 2 day of November, 2009.



Melissa A. Lucore  
NOTARY PUBLIC FOR WASHINGTON

My Commission Expires: July 15, 2011

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

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UE 210

In the Matter of )  
PACIFIC POWER & LIGHT )  
(dba PACIFICORP) )  
Request for a General Rate Revision )

Public Utility Commission of Oregon  
Administrative Hearing Division  
AFFIDAVIT OF MICHAEL EARLY

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

1. My name is Michael Early. I am the Executive Director of Industrial Customers of Northwest Utilities ("ICNU"). I am appearing in this proceeding as a witness for ICNU. My business address is: 333 SW Taylor, Suite 400, Portland, OR 97204.

2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 210. Specifically, my Response Testimony and exhibits, ICNU/700-702, were filed on October 21, 2009.

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

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 AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 3<sup>rd</sup> day of November, 2009, at Portland, Oregon.

Michael Early

Michael Early

SUBSCRIBED AND SWORN to before me this 3<sup>rd</sup> day of November, 2009.

Kari Harteloo

NOTARY PUBLIC FOR OREGON

My Commission Expires: 1.17.13





BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 210

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NOV 09 2009

Public Utility Commission of Oregon  
Administrative Hearing Division

In the Matter of )  
)  
PACIFIC POWER & LIGHT ) AFFIDAVIT OF ELLEN  
(dba PACIFICORP) ) BLUMENTHAL  
)  
)  
Request for a General Rate Revision )

I, Ellen Blumenthal, being first duly sworn on oath, depose and say:

1. My name is Ellen Blumenthal. I am a Principal with GDS Associates, Inc. ("GDS"). I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU") and the Citizens Utility Board of Oregon ("CUB"). My business address is: 13517 Queen Johanna Court, Corpus Christi, Texas 78418.

2. I sponsored pre-filed testimony and exhibits on behalf of ICNU and CUB in Oregon Public Utility Commission Docket No. UE 210. Specifically, my pre-filed Opening Testimony and exhibits, ICNU-CUB/400-403, were filed on July 24, 2009. In addition, I filed Response Testimony and exhibits solely on behalf of ICNU on October 21, 2009, ICNU/600-602.

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

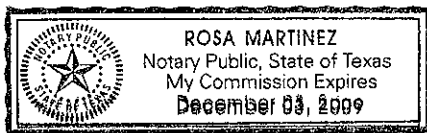
I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 3 day of November, 2009, at Corpus Christi, Texas.

Ellen Blumenthal

Ellen Blumenthal

SUBSCRIBED AND SWORN to before me this 3 day of November, 2009.



Rosa Martinez  
NOTARY PUBLIC FOR TEXAS

My Commission Expires: 12/03/09

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

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NOV 09 2009

UE 210

Public Utility Commission of Oregon  
Administrative Hearing Division

In the Matter of )  
)  
PACIFIC POWER & LIGHT )  
(dba PACIFICORP) )  
)  
Request for a General Rate Revision )

AFFIDAVIT OF MICHAEL GORMAN

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

1. My name is Michael Gorman. I am employed by the firm of Brubaker & Associates, Inc. ("BAI"), regulatory and economic consultants with corporate headquarters in Chesterfield, Missouri. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU") and the Citizens Utility Board of Oregon ("CUB"). My business address is: 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

2. I sponsored pre-filed testimony and exhibits on behalf of ICNU and CUB in Oregon Public Utility Commission Docket No. UE 210. Specifically, my pre-filed Opening Testimony and exhibits, ICNU-CUB/300-323, were filed on July 24, 2009. In addition, I filed Response Testimony and exhibits solely on behalf of ICNU on October 21, 2009, ICNU/500-502.

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

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 AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 2nd day of November, 2009, at Chesterfield, Missouri.

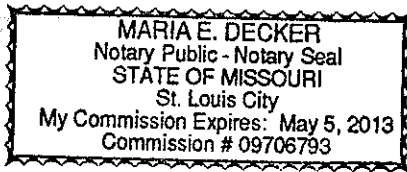


Michael Gorman

SUBSCRIBED AND SWORN to before me this 2nd day of November, 2009.



NOTARY PUBLIC FOR MISSOURI



My Commission Expires: May 5, 2013

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Motion to Admit Prefiled Testimonies and Exhibits on behalf of the Industrial Customers of Northwest Utilities ("ICNU") and the Citizens' Utility Board ("CUB"), Affidavits of Randall Falkenberg, Ellen Blumenthal, Michael Gorman, Donald Schoenbeck, and Michael Early on behalf of ICNU, and Affidavits of Ellen Blumenthal and Michael Gorman on behalf of ICNU and CUB upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, or sent via electronic mail to those parties who have waived paper service in this proceeding.

Dated at Portland, Oregon, this 4th day of November, 2009.

  
Allison M. Wils

**(W) PACIFIC POWER & LIGHT**

JORDAN A WHITE  
JOELLE STEWARD  
SENIOR COUNSEL  
825 NE MULTNOMAH STE 1800  
PORTLAND OR 97232  
jordan.white@pacificorp.com  
joelle.steward@pacificorp.com

**(W) MCDOWELL & RACKNER PC**

KATHERINE A MCDOWELL  
AMIE JAMIESON  
520 SW SIXTH AVE - SUITE 830  
PORTLAND OR 97204  
katherine@mcd-law.com  
amie@mcd-law.com

**PUBLIC UTILITY COMMISSION OF OREGON**

DEBORAH GARCIA  
PO BOX 2148  
SALEM OR 97301  
deborah.garcia@state.or.us

**(W) PACIFICORP**

OREGON DOCKETS  
825 NE MULTNOMAH ST STE 2000  
PORTLAND OR 97232  
oregondockets@pacificorp.com

**DEPARTMENT OF JUSTICE**

JASON W JONES (C)  
ASSISTANT ATTORNEY  
1162 COURT ST NE  
SALEM OR 97301-4096  
jason.w.jones@state.or.us

**(W) CITIZEN'S UTILITY BOARD OF OREGON**

G. CATRIONA MCCrackEN (C)  
GORDON FEIGNER (C)  
ROBERT JENKS (C)  
610 SW BROADWAY - STE 308  
PORTLAND OR 97205  
catriona@oregoncub  
gordon@oregoncub.org  
bob@oregoncub.org

**BOEHM KURTZ & LOWRY**  
KURT J BOEHM  
MICHAEL L KURTZ  
36 E SEVENTH ST - STE 1510  
CINCINNATI OH 45202  
kboehm@bkllawfirm.com  
mkurtz@bkllawfirm.com

**(W) KLAMATH WATER USERS ASSOCIATION**  
GREG ADDINGTON (C)  
2455 PATTERSON ST - STE 3  
KLAMATH FALLS OR 97603  
greg@cvcwireless.net

**(W) PORTLAND GENERAL ELECTRIC**  
DOUGLAS C TINGEY  
121 SW SALMON 1WTC13  
PORTLAND OR 97204  
doug.tingey@pgn.com

**(W) CABLE HUSTON BENEDICT ET AL**  
J LAURENCE CABLE (C)  
RICHARD LORENZ (C)  
1001 SW 5TH AVE STE 2000  
PORTLAND OR 97204-1136  
lcable@chbh.com  
rlorenz@cablehuston.com

**(W) PORTLAND GENERAL ELECTRIC**  
RANDALL DAHLGREN  
121 SW SALMON ST - 1WTC0702  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com