

RICHARD LORENZ

[rlorenz@cablehuston.com](mailto:rlorenz@cablehuston.com)  
[www.cablehuston.com](http://www.cablehuston.com)

May 30, 2013

**VIA ELECTRONIC FILING & US MAIL**

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

**Re: UM-1610 -- *Investigation into Qualifying Facility Contracting and Pricing***

Dear Filing Center:

Enclosed please find an original and two copies of Threemile Canyon Wind I, LLC's Motion to Admit Pre-filed Testimony and Exhibits and Affidavit for John A. Harvey in the above-referenced docket.

An electronic copy is also being served on the attached service list. Should you have any questions, please feel free to contact me.

Thank you for your assistance with this matter

Very truly yours,

/s/ Richard Lorenz

Richard Lorenz

RGL:tjb  
Enclosures  
cc: UM-1610 Service List

4810-7705-2692, v. 1

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1610**

|  |   |                           |
|--|---|---------------------------|
| In the Matter of                       | ) |                           |
|  | ) |                           |
| PUBLIC UTILITY COMMISSION OF           | ) | MOTION TO ADMIT PRE-FILED |
| OREGON,                                | ) | TESTIMONY AND EXHIBITS    |
|  | ) |                           |
| Investigation into Qualifying Facility | ) |                           |
| Contracting and Pricing.               | ) |                           |

Threemile Canyon Wind I, LLC (“Threemile Canyon”) hereby respectfully submits its motion to admit Threemile Canyon’s Testimony and Exhibits and Hearing Exhibits into the record. They are as follows:

**Pre-filed Testimony and Exhibits**

1. Pre-filed Direct Testimony and Exhibits of John A. Harvey on behalf of Threemile Canyon (Threemile/100-104);
2. Pre-filed Reply Testimony and exhibits of John A. Harvey on behalf of Threemile Canyon (Threemile/200-203); and,
3. The Affidavit of John A. Harvey attesting that his pre-filed Direct Testimony and Reply Testimony are true and correct.

**Hearing Exhibits**

|               |  |
|---------------|--|
| THREEMILE/204 | Excerpt of Order No. 05-584 in UM-1129 dated May 13, 2005                  |
| THREEMILE/205 | Email From Bruce Griswold, To Peter Solomon, Dated July 13, 2006 @ 4:42 pm |
| THREEMILE/206 | Email From Bruce Griswold, To Jim Portouw, Dated March 9, 2007 @ 10:00 am  |
| THREEMILE/207 | Excerpt: PacifiCorp FERC Form No. 1 2012/Q4                                |

THREEMILE/208

UM 1610-- PacifiCorp's Responses to Threemile Canyon  
Wind Requests 1.19 and 1.20 dated March 8, 2013

THREEMILE/209

Excerpt from *Entergy Services, Inc.*, 137 FERC ¶ 61,199  
(2011)

DATED this 30<sup>th</sup> day of May, 2013.

Respectfully submitted,

/s/ Richard Lorenz

Richard Lorenz, OSB No. 003086

Cable Huston LLP

1001 SW Fifth Ave., Suite 2000

Portland, OR 97204-1136

E-Mail: [rlorenz@cablehuston.com](mailto:rlorenz@cablehuston.com)

Of Attorneys for the  
Threemile Canyon Wind I, LLC

4839-3270-9908, v. 1

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1610**

In the Matter of )  
)  
PUBLIC UTILITY COMMISSION OF ) AFFIDAVIT OF JOHN A. HARVEY  
OREGON, )  
)  
Investigation into Qualifying Facility )  
Contracting and Pricing. )

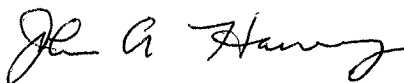
I, JOHN A. HARVEY, being first duly sworn on oath, depose and say:

1. My name is John A. Harvey. I am employed by Exelon Generation as Manager of Regulatory and Markets Liaison. I am the same John A. Harvey who previously filed testimony on behalf of Threemile Canyon Wind I, LLC in this docket. (See Direct Testimony and exhibits of John A. Harvey, Threemile/100-104, Reply Testimony and exhibits of John A. Harvey, Threemile/200-203.)

2. All of the matters stated in my pre-filed Testimony are true and accurate based on my information and belief.

3. I declare under penalty of perjury under the laws of the state of Oregon that the foregoing is true and correct based on my information and belief.

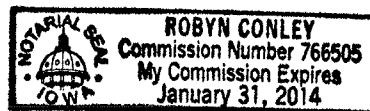
SIGNED this 28th day of May, 2013 at Des Moines, Iowa.

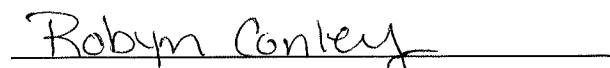


\_\_\_\_\_  
John A. Harvey

SUBSCRIBED AND SWORN to before me this 28 day of May, 2013.

State of Iowa )  
) ss  
County of Polk )



  
\_\_\_\_\_  
Notary Public for the State of Iowa  
My Commission Expires: 11/31/14

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served the foregoing **THREEMILE CANYON WIND I, LLC's MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS** via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

**PACIFIC POWER**

Mary Wiencke  
R. Bryce Dalley  
825 NE Multnomah St., Ste 1800  
Portland, OR 97232-2149  
[Mary.wiencke@pacificorp.com](mailto:Mary.wiencke@pacificorp.com)  
[Bryce.dalley@pacificorp.com](mailto:Bryce.dalley@pacificorp.com)

**PUBLIC UTILITY COMMISSION OF OREGON**

Brittany Andrus  
Adam Bless  
P.O. Box 2148  
Salem, OR 97308-2148  
[Brittany.andrus@state.or.us](mailto:Brittany.andrus@state.or.us)  
[Adam.bless@state.or.us](mailto:Adam.bless@state.or.us)

**PORTLAND GENERAL ELECTRIC**

J. Richard George  
Jay Tinker  
121 SW Salmon ST - 1WTC1301  
Portland OR 97204  
[richard.george@pgn.com](mailto:richard.george@pgn.com)  
[Pge.opuc.filings@pgn.com](mailto:Pge.opuc.filings@pgn.com)

**PACIFICORP, DBA PACIFIC POWER**

Oregon Dockets  
825 NE Multnomah St., Ste. 2000  
Portland, OR 97232  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

**LOYD FERY**

11022 Rainwater Lane SE  
Aumsville OR 97325  
[dlchain@wvi.com](mailto:dlchain@wvi.com)

**THOMAS H. NELSON**

PO Box 1211  
Welches OR 97067-1211  
[nelson@thnelson.com](mailto:nelson@thnelson.com)

**OREGON DEPT OF ENERGY**

Matt Krumenauer  
Kacia Brockman  
625 Marion ST NE  
Salem OR 97301  
[matt.krumenauer@state.or.us](mailto:matt.krumenauer@state.or.us)  
[Kacia.brockman@state.or.us](mailto:Kacia.brockman@state.or.us)

**ANNALA, CAREY, BAKER, PC**

Will K. Carey  
PO Box 325  
Hood River OR 97031  
[wcarey@hoodriverattorneys.com](mailto:wcarey@hoodriverattorneys.com)

**ASSOCIATION OF OREGON COUNTIES**

Mike McArthur  
PO BOX 12729  
Salem OR 97309  
[mmcarthur@aocweb.org](mailto:mmcarthur@aocweb.org)

**CITIZENS UTILITY BOARD OF OREGON**

OPUC Dockets  
Robert Jenks  
G. Catriona McCracken  
610 SW Broadway, STE 400  
Portland OR 97205

[dockets@oregoncub.org](mailto:dockets@oregoncub.org); [bob@oregoncub.org](mailto:bob@oregoncub.org)  
[catriona@oregoncub.org](mailto:catriona@oregoncub.org)

**CITY OF PORTLAND-  
PLANNING AND SUSTAINABILITY**

David Tooze  
1900 SW 4TH STE 7100  
Portland OR 97201  
[david.tooze@portlandoregon.gov](mailto:david.tooze@portlandoregon.gov)

**EXELON BUSINESS SERVICES**

John Harvey  
4601 Westown Parkway, Suite 300  
West Des Moines, IA 50266  
[John.harvey@exeloncorp.com](mailto:John.harvey@exeloncorp.com)

Cynthia Fonner Brady  
Assistant General Counsel  
4300 Winfield Road  
Warrenville, IL 60555  
[Cynthia.Brady@constellation.com](mailto:Cynthia.Brady@constellation.com)

**ENERGY TRUST OF OREGON**

Elaine Prause  
John Volkman  
421 SW Oak ST #300  
Portland OR 97204-1817  
[elaine.prause@energytrust.org](mailto:elaine.prause@energytrust.org)  
[john.volkman@energytrust.org](mailto:john.volkman@energytrust.org)

**IDAHO POWER COMPANY**

Donovan E Walker  
Julia Hilton  
Regulatory Dockets  
PO Box 70  
Boise, ID 83707-0070  
[jhilton@idahopower.com](mailto:jhilton@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)  
[dwalker@idahopower.com](mailto:dwalker@idahopower.com)

**LOVINGER KAUFMANN LLP**

Kenneth Kaufmann  
Jeffrey S. Lovinger  
825 NE Multnomah Ste. 925  
Portland OR 97232-2150  
[kaufmann@lklaw.com](mailto:kaufmann@lklaw.com)  
[lovinger@lklaw.com](mailto:lovinger@lklaw.com)

**CLEANTECH LAW PARTNERS , PC**

Diane Henkels  
6228 SW Hood  
Portland OR 97239  
[dhenkels@cleantechlawpartners.com](mailto:dhenkels@cleantechlawpartners.com)

**DAVISON VAN CLEVE**

Irion A Sanger  
Melinda Davison  
S. Bradley VanCleve  
333 SW Taylor - Ste 400  
Portland OR 97204  
[ias@dvclaw.com](mailto:ias@dvclaw.com);  
[mjd@dvclaw.com](mailto:mjd@dvclaw.com)  
[bvc@dvclaw.com](mailto:bvc@dvclaw.com)

**ESLER STEPHENS & BUCKLEY**

John W Stephens  
888 SW Fifth AVE Ste 700  
Portland OR 97204-2021  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com);  
[mec@eslerstephens.com](mailto:mec@eslerstephens.com)

**SMALL BUSINESS UTILITY  
ASSOCIATES**

James Birkelund  
548 Market ST Ste 11200  
San Francisco CA 94104  
[james@utilityadvocates.org](mailto:james@utilityadvocates.org)

**MCDOWELL RACKNER & GIBSON PC**

Lisa F. Rackner  
419 SW 11<sup>th</sup> Ave., Ste. 400  
Portland OR 97205  
[dockets@mcd-law.com](mailto:dockets@mcd-law.com)

**NORTHWEST ENERGY SYSTEMS  
COMPANY LLC**

Daren Anderson  
1800 NE 8TH ST., Ste 320  
Bellevue WA 98004-1600  
[da@thenescogroup.com](mailto:da@thenescogroup.com)

**OREGON DEPARTMENT OF  
JUSTICE**

Renee M. France  
Natural Resources Section  
1162 Court ST NE  
Salem OR 97301-4096  
[renee.m.france@doj.state.or.us](mailto:renee.m.france@doj.state.or.us)

**OREGONIANS FOR RENEWABLE  
ENERGY POLICY**

Kathleen Newman  
1553 NE Greensword DR  
Hillsboro OR 97214  
[k.a.newman@frontier.com](mailto:k.a.newman@frontier.com)  
[kathleenhoipl@frontier.com](mailto:kathleenhoipl@frontier.com)

**REGULATORY &  
COGENERATION SERVICES, INC**

Donald W. Schoenbeck  
900 Washington ST Ste 780  
Vancouver WA 98660-3455  
[dws@r-c-s-inc.com](mailto:dws@r-c-s-inc.com)

**PUBLIC UTILITY COMMISSION  
STAFF--DEPT OF JUSTICE**

Stephanie S. Andrus  
Business Activities Section  
1162 Court ST NE  
Salem OR 97301-4096  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)

**RENEWABLE NORTHWEST PROJ**

RNP Dockets  
Megan Walseth Decker  
421 SW 6TH AVE., Ste. 1125  
Portland OR 97204  
[dockets@rnp.org](mailto:dockets@rnp.org)  
[megan@rnp.org](mailto:megan@rnp.org)

**ONE ENERGY RENEWABLES**

Bill Eddie  
206 NE 28TH AVE  
Portland OR 97232  
[bill@oneenergyrenewables.com](mailto:bill@oneenergyrenewables.com)

**OREGON SOLAR ENERGY  
INDUSTRIES ASSOCIATION**

Glenn Montgomery  
PO BOX 14927  
Portland OR 97293  
[glenn@oseia.org](mailto:glenn@oseia.org)

**OREGONIANS FOR RENEWABLE  
ENERGY POLICY**

Mark Pete Pengilly  
PO BOX 10221  
Portland OR 97296  
[mpengilly@gmail.com](mailto:mpengilly@gmail.com)

**STOLL BERNE**

David A Lokting  
209 SW Oak Street, Suite 500  
Portland OR 97204  
[dlokting@stollberne.com](mailto:dlokting@stollberne.com)

**RENEWABLE ENERGY COALITION**

John Lowe  
12050 SW Tremont ST  
Portland OR 97225-5430  
[jravenesanmarcos@yahoo.com](mailto:jravenesanmarcos@yahoo.com)

**RICHARDSON AND O'LEARY**

Gregory M. Adams  
Peter J. Richardson  
PO BOX 7218  
Boise ID 83702  
[greg@richardsonandoleary.com](mailto:greg@richardsonandoleary.com)  
[peter@richardsonandoleary.com](mailto:peter@richardsonandoleary.com)

**ROUSH HYDRO INC**

Toni Roush  
366 E Water  
Stayton OR 97383  
[tmroush@wvi.com](mailto:tmroush@wvi.com)

Dated in Portland, Oregon, this 30<sup>th</sup> day of May, 2013.

/s/ Richard Lorenz

Richard Lorenz, OSB No. 003086  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW Fifth Avenue, Suite 2000  
Portland, OR 97204-1136  
(503) 224-3092 (Telephone)  
(503) 224-3176 (Fax)  
[rlorenz@cablehuston.com](mailto:rlorenz@cablehuston.com)

Of Attorneys for the  
Threemile Canyon Wind I, LLC