Davison Van Cleve PC

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

Suite 400 333 SW Taylor Portland, OR 97204

September 16, 2014

Via Electronic Mail and Federal Express

Public Utility Commission of Oregon Attn: Filing Center 3930 Fairview Industrial Drive SE Salem OR 97302

Re:

PACIFICORP dba PACIFIC POWER

2015 Transition Adjustment Mechanism

Docket No. UE 287

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Motion to Admit Pre-filed Testimony and Exhibits of the Industrial Customers of Northwest Utilities.

Thank you for your assistance. If you have any questions, please do not hesitate to contact our office.

Sincerely,

Jesse O. Gorsuch

Enclosures

cc:

Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the MOTION TO ADMIT PRE-FILED TESTIMONY OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES upon all parties in this proceeding by causing a copy thereof to be sent via electronic mail to each party's last-known e-mail address, as shown below.

Dated at Portland, Oregon, this 16th day of September, 2014.

Jesse O. Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON

OPUC DOCKETS
ROBERT JENKS
G. CATRIONA MCCRACKEN
610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org
bob@oregoncub.org
catriona@oregon.org

(W) PUC STAFF – DEPARTMENT OF JUSTICE

MICHAEL T. WEIRICH BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4796 michael.weirich@state.or.us

(W) MCDOWELL RACKNER & GIBSON PC

KATHERINE MCDOWELL 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 katherine@mcd-law.com

(W) ENERGY STRATEGIES LLC

KEVIN HIGGINS 215 STATE ST, STE 200 SALT LAKE CITY, UT 84111-2322 khiggins@energystrat.com

(W) PUBLIC UTILITY COMMISSION OF OREGON

JORGE ORDONEZ P.O. BOX 1088 SALEM, OR 97308-2148 jorge.ordonez@state.or.us

(W) NOBLE AMERICAS ENERGY SOLUTIONS, LLC

GREG BASS 401 WEST A ST., STE 500 SAN DIEGO, CA 92101 gbass@noblesolutions.com (W) RICHARDSON ADAMS, PLLC GREGORY ADAMS PO BOX 7218 BOISE, ID 83702 greg@richardsonadams.com

(W) PACIFIC POWER, dba PACIFIC POWER

OREGON DOCKETS 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com (W) PACIFIC POWER SARAH WALLACE 825 NE MULTNOMAH ST, STE 1800 PORTLAND, OR 97232 sarah.wallace@pacificorp.com

(W) PORTLAND GENERAL ELECTRIC DOUGLAS C. TINGEY – 1WTC1301 JAY TINKER – 1WTC-0702 121 SW SALMON ST PORTLAND, OR 97204 doug.tingey@pgn.com pge.opuc.filings@pgn.com

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 287

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

MOTION TO ADMIT PRE-FILED TESTIMONY OF BRADLEY G. MULLINS

2015 Transition Adjustment Mechanism

Pursuant to OAR 860-001-0420, the Industrial Customers of Northwest Utilities ("ICNU") moves for admission into the record of this proceeding the following pre-filed testimony and exhibits, submitted on behalf of ICNU:

Testimony & Exhibits	Description
Confidential ICNU/100	Confidential Opening Testimony of Bradley G. Mullins
ICNU/101	Qualifications of Bradley G. Mullins
ICNU/102	PacifiCorp-ISO Energy Imbalance Market Benefits, Energy and Environmental Economics, Inc. Study
ICNU/103	Excerpt of the Direct Testimony of Stefan A. Bird in Docket No. UM 1689
Confidential ICNU/104	Test Period Gains/ (Losses) Associated with Goldman Sachs Swap Transactions
ICNU/105	Source Documents Associated with Goldman Sachs Swap Transactions
Settling Parties/100	Testimony of Bradley G. Mullins in support of the stipulation filed in Docket Nos. UE 287 and UM 1689

The Affidavit of Bradley G. Mullins attesting to the truth and accuracy of the testimony and exhibits is attached.

Dated this 16th day of September, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

S. Bradley Van Cleve

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

bvc@dvclaw.com

tcp@dvclaw.com

Of Attorneys for the Industrial Customers of Northwest

Utilities

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 287

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

2015 Transition Adjustment Mechanism

AFFIDAVIT OF BRADLEY G. MULLINS

I, BRADLEY G. MULLINS, being first duly sworn on oath, depose and say:

- 1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities ("ICNU") in this matter.
- 2. I filed testimony and exhibits (Settling Parties/100-101 and ICNU/100-105) on behalf of ICNU 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 16th day of September, 2014.

SUBSCRIBED AND SWORN to before me this 16th day of September, 2014.

OFFICIAL STAMP

My Commission Expires: