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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
Application for Approval of Deferred Accounting and Prudence Determination
Associated with the Energy Imbalance Market
Docket No. UM 1689

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

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1689

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Deferred Accounting and
Prudence Determination Associated with the
Energy Imbalance Market

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

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
ICNU/100	Opening Testimony of Bradley G. Mullins
ICNU/101	Qualifications of Bradley G. Mullins
ICNU/102	Excerpt of Opening Testimony of Bradley G. Mullins in Docket No. UE 287
ICNU/103	PacifiCorp’s Responses to ICNU Data Requests 1.19 and 1.21
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.

A handwritten signature in black ink that reads "S. Bradley Van Cleve". The signature is written in a cursive style with a large, stylized initial "S".

S. Bradley Van Cleve

Tyler C. Pepple

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Of Attorneys for the Industrial Customers of Northwest
Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1689

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Deferred Accounting and
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Energy Imbalance Market

AFFIDAVIT OF
BRADLEY G. MULLINS

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

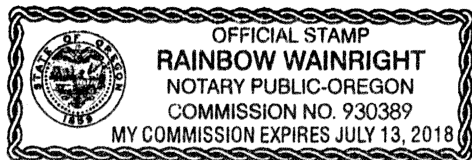
1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities (“ICNU”) in this matter.
2. I filed testimony and exhibits (ICNU/100 – ICNU/103 and Settling Parties/100) on behalf of ICNU in this matter.
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

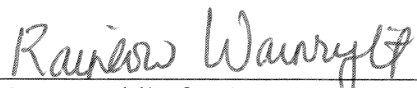
SIGNED this 16th day of September, 2014.



BRADLEY G. MULLINS

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





Notary Public for Oregon
My Commission Expires: 9/16/2014
County of Multnomah