

# Davison Van Cleve PC

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April 28, 2015

## *Via Electronic Filing*

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 Deer Creek Mine Transaction  
**Docket No. UM 1712**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find 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 call.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1712**

In the Matter of )  
PACIFICORP d/b/a PACIFIC POWER ) MOTION TO ADMIT PRE-FILED  
Application for Approval of Deer Creek Mine ) TESTIMONY AND EXHIBITS OF THE  
Transaction. ) INDUSTRIAL CUSTOMERS OF  
) NORTHWEST UTILITIES  
\_\_\_\_\_ )

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:

<b>Testimony &amp; Exhibits</b>	<b>Description</b>
Confidential ICNU/100	Confidential Response Testimony of Bradley G. Mullins on behalf of ICNU
ICNU/101	Qualification Statement of Bradley G. Mullins
Confidential ICNU/102	Confidential Excerpt from 1974 Pension Trust 2013 Actuarial Report
ICNU/103	ECD Calculation with Transaction Costs
ICNU/104	Company Responses to ICNU Data Requests (“DRs”)

<b>Testimony &amp; Exhibits</b>	<b>Description</b>
ICNU/105	High-level Calculation of 50% Bonus Depreciation Impact
Confidential ICNU/106	Confidential Excerpt of Deer Creek Mine Transaction – Technical Conference with Public Utility Commission of Oregon (Feb. 23, 2015)
ICNU/200	Company Responses to ICNU DR 1.41; Sierra Club DR 2.11 (CSAs)
ICNU/201	Company Response to ICNU DR 5.82 (Deferrals)
ICNU/202	Company Responses to ICNU DR 1.9; OPUC DR 19 (Health Care Costs)
ICNU/203	Company's 1 <sup>st</sup> Supp. Response to ICNU DR 1.21 (Pension Trust)
ICNU/204	Company Response to ICNU DR 3.67 and Attachment (Rate Spread)
ICNU/205	Company Responses to ICNU DR 5.81; DPU DR 2.2; OCS DR 2.23 (Deer Creek Discovery)
ICNU/300	Supp. Responsive Testimony of Bradley G. Mullins on behalf of ICNU
ICNU/301	Responses to Data Requests
Confidential ICNU/302	Confidential Net Benefit Calculation Through 2029

This motion is supported by the Affidavit of Bradley G. Mullins and the Declaration of Jesse E. Cowell, filed on April 15, 2015, attesting to the truth and accuracy of the testimony and exhibits. As noted by the Administrative Law Judge in the Procedural Conference Memorandum issued April 16, 2015, all parties have waived their rights to object to the acceptance of pre-filed testimony and exhibits into the record.

Dated this 28th day of April, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Jesse E. Cowell*

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