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June 7, 2016

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: OPUC Investigation to Explore Issues Related to a Renewable Generator's
Contribution to Capacity
Docket No. UM 1719

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 1719

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation to Explore Issues Related to a
Renewable Generator’s Contribution to
Capacity.

MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS

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	Qualification Statement of Bradley G. Mullins
ICNU/102	Utility Responses to ICNU Data Requests

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

Dated this 7th day of June, 2016

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the Industrial Customers of Northwest
Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
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UM 1719

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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/102) 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 3rd day of June, 2016.



BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 3rd day of June, 2016.





Notary Public for Oregon
County of Multnomah
My Commission Expires: 10/18/19