

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of) UE 296
)
PacifiCorp, dba Pacific Power, 2016 Transition)
Adjustment Mechanism) MOTION TO ADMIT PR-FILED
) TESTIMONY AND EXHIBITS OF
) NOBLE AMERICAS ENERGY
) SOLUTIONS LLC

Noble Americas Energy Solutions LLC (“Noble Solutions”) hereby respectfully moves for admission of the following pre-filed testimony and exhibits into the record in this matter.

The Affidavit of Kevin C. Higgins is attached in support of the truth and veracity of the following testimony and exhibits.

Pre-Filed Exhibits to Be Admitted

Exhibit: Redacted and Confidential Noble Solutions 100
Description: Opening Testimony of Kevin C. Higgins
Filed: June 29, 2015; Errata filed August 17, 2015

Exhibit: Noble Solutions 101
Description: Oregon Electric Industry Restructuring Status Report – July 2014
Filed: June 29, 2015

Exhibit: Noble Solutions 102
Description: PacifiCorp’s Response to Noble Solutions’ Data Requests 1.1, 1.7, 1.8, 1.9, 1.11, 1.12, 1.13, 3.22, 4.23, 4.24, 4.25
Filed: June 29, 2015

Exhibit: Confidential Noble Solutions 103
Description: PacifiCorp’s Confidential Response to Noble Solutions’ Data Request 3.22
Filed: June 29, 2015

Exhibit: Noble Solutions 104
Description: Derivation of Return Component in Schedule 200
Filed: June 29, 2015

Exhibit: Noble Solutions 105
Description: PacifiCorp's Response to Noble Solutions' Data Requests 1.16, 2.17, 2.18, 2.19
Filed: June 29, 2015

RESPECTFULLY SUBMITTED on August 28, 2015.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 296

In the Matter of

PacifiCorp, dba Pacific Power, 2016
Transition Adjustment Mechanism

AFFIDAVIT OF KEVIN C. HIGGINS
REGARDING NOBLE AMERICA ENERGY
SOLUTIONS LLC'S TESTIMONY AND
EXHIBITS 100-105

STATE OF Utah)
) ss.
County of Salt Lake)

I, Kevin C. Higgins, being first duly sworn on oath, depose and say:

1. My name is Kevin C. Higgins. I am a Principal in the firm of Energy Strategies, LLC, and was retained as a consultant by Nobel Americas Energy Solutions LLC ("Noble Solutions") in this case.

2. I am the same Kevin C. Higgins that previously caused to be filed following testimony and exhibits in this docket on June 29, 2015: Noble Solutions/100, Noble Solutions/101, Noble Solutions/102, Noble Solutions/103, Noble Solutions/104, and Noble Solutions/105, as modified by the Errata to Noble Solutions/100 filed on August 17, 2015.

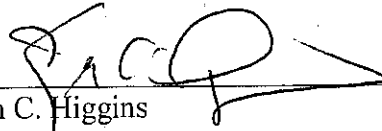
3. My pre-filed testimony and exhibits are true and accurate based on my information and belief. If I were answer those questions today, my responses would be the same.

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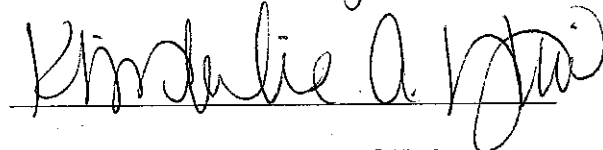
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I declare under penalty of perjury under the laws of the state of Utah that the foregoing is true and correct based on my information and belief.

I signed this the 17th day of August 2015.


Kevin C. Higgins

SUBSCRIBED AND SWORN to before me this 17th day of August 2015.



Notary Public for the State of Utah

Residing at Salt Lake

My Commission expires April 10, 2019

