

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

October 24, 2017

Via Electronic Filing

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
Request for a General Rate Revision
Docket No. UE 319

Dear Filing Center:

Please find enclosed 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

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 319

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision.

MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS OF THE
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:

Testimony & Exhibits	Description
ICNU/100	Confidential Opening Power Cost Testimony of Bradley G. Mullins
ICNU/101	Regulatory Appearances of Bradley G. Mullins
ICNU/200	Opening Testimony of Michael P. Gorman
ICNU/201	Qualifications of Michael P. Gorman
ICNU/202	Rate of Return
ICNU/203	Valuation Metrics
ICNU/204	Timeline of Federal Funds Rate
ICNU/205	Proxy Group
ICNU/206	Consensus Analysts’ Growth Rates
ICNU/207	Constant Growth DCF Model

PAGE 1 – ICNU MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS

	(Consensus Analysts' Growth Rates)
ICNU/208	Payout Ratios
ICNU/209	Sustainable Growth Rate
ICNU/210	Constant Growth DCF Model (Sustainable Growth Rate)
ICNU/211	Electricity Sales Are Linked to U.S. Economic Growth
ICNU/212	Multi-State Growth DCF Model
ICNU/213	Common Stock Market / Book Ratio
ICNU/214	Equity Risk Premium – Treasury Bond
ICNU/215	Equity Risk Premium – Utility Bond
ICNU/216	Bond Yield Spreads
ICNU/217	Treasury and Utility Bond Yields
ICNU/218	Value Line Beta
ICNU/219	CAPM Return
ICNU/220	Standard & Poor's Credit Metrics
ICNU/221	Accuracy of Interest Rate Forecasts
ICNU/300	Confidential Opening Testimony of Bradley G. Mullins
ICNU/301	Revenue Requirement Detail
ICNU/302	2018 Budget v. 2016 Actual Results
ICNU/303	Responses to ICNU Data Requests
ICNU/304	Internal Revenue Service Private Letter Ruling 201418024
ICNU/400	Cross-Answering General Rate

	Case Testimony of Bradley G. Mullins
ICNU/401	B-Engrossed Senate Bill 838
ICNU/402	PGE Response to CUB Data Request 002; CUB Responses to ICNU Data Requests 001-008
ICNU/403	ICNU Rebuttal Testimony and Exhibits (ICNU/400 – ICNU/404) in Docket No. UE 283
ICNU/404	Excerpt of ICNU Rebuttal Testimony and Exhibits (ICNU/300 – ICNU/306) in Docket No. UE 283
ICNU/405	Excerpt of PGE Reply Testimony (PGE/1600) in Docket No. UE 283
ICNU/406	Excerpt of Revised Surrebuttal Testimony and Exhibits of PGE (PGE/2200 – PGE/2201) in Docket No. UE 283
ICNU/407	Excerpt of Staff Rebuttal Testimony (Staff/1300) in Docket No. UE 283
ICNU/408	PGE 2016 Report – Greater than 1 aMW Analysis Project

The Affidavits of Bradley G. Mullins and Michael P. Gorman attesting to the truth and accuracy of the foregoing testimony and exhibit filings, as well as testimony and exhibits offered in support of the stipulations filed in this proceeding, are attached.

Dated this 24th day of October, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 (telephone)

tcp@dvclaw.com

Of Attorneys for the Industrial Customers of Northwest
Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 319

In the Matter of

PORTLAND GENERAL ELECTRIC,

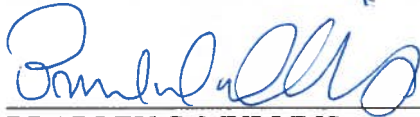
Request for a General Rate Revision.

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 sponsored testimony and exhibit filings (ICNU/100-101; ICNU/300-304; ICNU/400-408; Stipulating Parties/200-202; and Stipulating Parties/300-302) on behalf of ICNU and the Stipulating Parties in this matter.
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 24th day of October, 2017.



BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 24th day of October, 2017.



Rainbow Wainright
Notary Public for Oregon *Multnomah County*
My Commission Expires: 7/31/18

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 319

In the Matter of

PORTLAND GENERAL ELECTRIC,

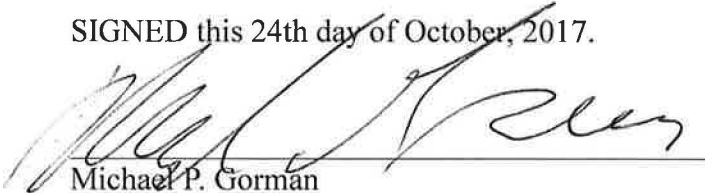
Request for a General Rate Revision.

AFFIDAVIT OF
MICHAEL P. GORMAN

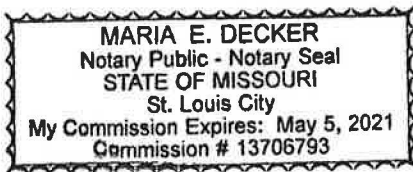
I, MICHAEL P. GORMAN, being first duly sworn on oath, depose and say:

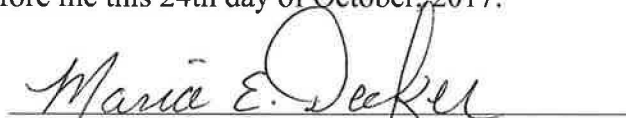
1. My name is Michael P. Gorman. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities (“ICNU”) in this matter.
2. I sponsored testimony and exhibit filings (ICNU/200-221) on behalf of ICNU in this matter.
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 24th day of October, 2017.


Michael P. Gorman

SUBSCRIBED AND SWORN to before me this 24th day of October, 2017.




Notary Public for Missouri
My Commission Expires: May 5, 2021