

# Davison Van Cleve PC

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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: In the Matter of PORTLAND GENERAL ELECTRIC  
Net Variable Power Costs (NVPC) and  
Annual Power Cost Update (APCU)  
**Docket No. UE 286**

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 email 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**

UE 286

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Net Variable Power Costs (NVPC) and Annual  
Power Cost Update (APCU)

MOTION TO ADMIT PRE-FILED  
TESTIMONY

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 Opening Testimony of Bradley G. Mullins
ICNU/101	Qualifications of Bradley G. Mullins
Confidential ICNU/102	PGE’s March 18, 2014 BPA VERBS Election Workshop Presentation
Confidential ICNU/103	Calculation of Self-Integration Benefits
Confidential ICNU/104	PGE Response to ICNU Data Request No. 26, Including Selection From Attachment A
ICNU/105	Cover Page of DNV KEMA Wind Study
ICNU/106	PGE’s Response to ICNU Data Request No. 77
Confidential ICNU/200	Confidential Rebuttal Testimony of Bradley G. Mullins
ICNU/201	Black & Veach Report on Capital Costs for Transmission and Substations

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.



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Of Attorneys for the Industrial Customers of Northwest  
Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 286

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Net Variable Power Costs (NVPC) and Annual  
Power Cost Update (APCU)

AFFIDAVIT OF  
BRADLEY G. MULLINS

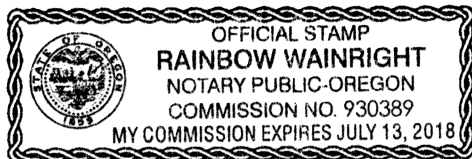
I, BRADLEY G. MULLINS, being first duly sworn on oath, depose and say:

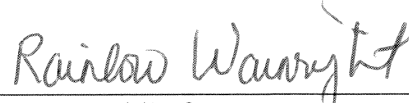
1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities (“ICNU”) in this matter.
2. I filed testimony and exhibits (ICNU/100 – ICNU/106 and ICNU/200 – ICNU/201) on behalf of ICNU in this matter.
3. To the best of my knowledge, 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