

# Davison Van Cleve PC

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June 4, 2009

*Via Electronic and US Mail*

Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
P.O. Box 2148  
Salem OR 97308-2148

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Investigation  
into determination of resource sufficiency, pursuant to Order No. 06-538  
**Docket No. UM 1396**

Dear Filing Center:

Enclosed please find the Motion to Supplement the Record on behalf of the  
Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely yours,

/s/ Brendan E. Levenick  
Brendan E. Levenick

Enclosures  
cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Motion to Supplement the Record on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, or sent via electronic mail to those parties who have waived papers service in this proceeding.

Dated at Portland, Oregon, this 4th day of June, 2009.

/s/ Brendan E. Levenick  
Brendan E. Levenick

<b>CITIZENS' UTILITY BOARD OF OREGON (W)</b> ROBERT JENKS G. CATRIONA MCCrackEN 610 SW BROADWAY STE 308 PORTLAND OR 97205 bob@oregoncub.org catriona@oregoncub.org	<b>OREGON PUBLIC UTILITY COMMISSION</b> ED DURRENBERGER PO BOX 2148 SALEM OR 97308-2148 ed.durrenberger@state.or.us
<b>MCDOWELL &amp; RACKNER PC (W)</b> WENDY MCINDOO LISA F RACKNER 520 SW 6TH AVE STE 830 PORTLAND OR 97204 wendy@mcd-law.com lisa@mcd-law.com	<b>PACIFIC POWER &amp; LIGHT (W)</b> JORDAN WHITE LEGAL COUNSEL 825 NE MULTNOMAH STE 1800 PORTLAND OR 97232 jordan.white@pacificorp.com
<b>PACIFICORP OREGON DOCKETS (W)</b> OREGON DOCKETS 825 NE MULTNOMAH ST STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com	<b>PORTLAND GENERAL ELECTRIC</b> RANDY DAHLGREN RATES & REGULATORY AFFAIRS J RICHARD GEORGE 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com richard.george@pgn.com

<p><b>DEPARTMENT OF JUSTICE (W)</b>  MICHAEL T WEIRICH  JANET L PREWITT  REGULATED UTILITY &amp; BUSINESS SECTION  1162 COURT ST NE  SALEM OR 97301-4096  michael.weirich@doj.state.or.us  janet.prewitt@doj.state.or.us</p>	<p><b>ANNALA, CAREY, BAKER, ET AL., PC (W)</b>  WILL K CAREY  PO BOX 325  HOOD RIVER OR 97031  wcarey@hoodriverattorneys.com</p>
<p><b>COMMUNITY RENEWABLE ENERGY ASSOCIATION (W)</b>  PAUL R WOODIN  EXECUTIVE DIRECTOR  1113 KELLY AVE  THE DALLES OR 97058  pwoodin@communityrenewables.org</p>	<p><b>IDAHO POWER COMPANY (W)</b>  RANDY ALLPHIN  CHRISTA BEARRY  BARTON L KLINE  MICHAEL YOUNGBLOOD  PO BOX 70  BOISE ID 83707-0070  rallphin@idahopower.com  cbearry@idahopower.com  bkline@idahopower.com  myoungblood@idahopower.com</p>
<p><b>OREGON DEPARTMENT OF ENERGY (W)</b>  VIJAY A SATYAL  SENIOR POLICY ANALYST  625 MARION ST NE  SALEM OR 97301  vijay.a.satyal@state.or.us</p>	<p><b>RICHARDSON &amp; O'LEARY PLLC (W)</b>  PETER J RICHARDSON  PO BOX 7218  BOISE ID 83707  peter@richardsonandoleary.com</p>

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1396**

In the Matter of )  
 )  
THE PUBLIC UTILITY COMMISSION OF ) MOTION TO SUPPLEMENT THE  
OREGON ) RECORD  
 )  
 )  
Investigation into determination of resource )  
sufficiency, pursuant to Order No. 06-538. )

Pursuant to the Notice of Cancellation of Hearing issued on June 2, 2009, the Industrial Customers of Northwest Utilities (“ICNU”) submits the following Motion to Supplement the Record. As stated in ICNU’s Cross-Examination statement, ICNU had intended to enter into the record a number of data responses from this case at the hearing. With the cancellation of the hearing, ICNU requests that the following data responses identified in Exhibit ICNU/300 be admitted into the record. ICNU has attempted to contact the parties who submitted these data responses, and PacifiCorp, Portland General Electric and Staff do not oppose their admission into the record.

Dated this 4th day of June, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

S. Bradley Van Cleve

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Of Attorneys for the Industrial Customers of  
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