

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

March 11, 2016

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 COMPANY
Application for Deferral Accounting of Excess Pension Costs and
Carrying Costs on Cash Contributions
Docket No. UM 1623

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 ("ICNU"). Also enclosed is the Affidavit of Bradley G. Mullins attesting to the truth and accuracy of his pre-filed testimony on behalf of ICNU.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1623

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	MOTION TO ADMIT PRE-FILED
COMPANY,)	TESTIMONY AND EXHIBITS OF THE
)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
Application for Deferral Accounting of Excess)	
Pension Costs and Carrying Costs on Cash)	
<u>Contributions.</u>)	

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	Company Responses to ICNU Data Requests
ICNU/103	Excerpt of PGE Earnings Conference Call – Fourth Quarter and Full Year 2013
ICNU/200	Excerpts of PGE’s Form 10-K Annual Reports (2012-2014)
ICNU/201	Exhibit Joint Testimony/200 from Docket No. UM 1633 (Direct Testimony of C. Kenneth Vogl)

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

Dated this 11th day of March, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

S. Bradley Van Cleve

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

bvc@dvclaw.com

tcp@dvclaw.com

Of Attorneys for the Industrial Customers of Northwest
Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

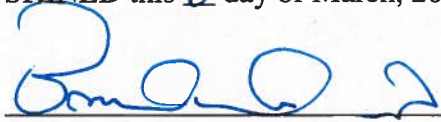
UM 1623

In the Matter of)	
)	AFFIDAVIT OF
PORTLAND GENERAL ELECTRIC)	BRADLEY G. MULLINS
COMPANY,)	
)	
Application for Deferral Accounting of Excess)	
Pension Costs and Carrying Costs on Cash)	
<u>Contributions.</u>)	

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

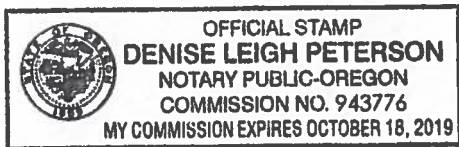
1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities ("ICNU") in this matter.
2. I filed testimony and exhibits (ICNU/100 – ICNU/103) on behalf of ICNU in this matter.
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.


SIGNED this 8 day of March, 2016.



BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 8 day of March, 2016.





Notary Public for Oregon
County of Multnomah
My Commission Expires: OCTOBER 18, 2019