

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 5, 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 PUBLIC UTILITY COMMISSION OF OREGON,
Investigation to Examine PacifiCorp, dba Pacific Power's Non-Standard Avoided
Cost Pricing
Docket No. UM 1802

Dear Filing Center:

Please find enclosed the Motion to Admit Pre-filed Testimony and Exhibit on
behalf 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

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1802

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation to Examine PacifiCorp, dba
Pacific Power's Non-Standard Avoided Cost
Pricing.

MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBIT 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	Reply Testimony of Bradley G. Mullins
ICNU/101	Qualification Statement of Bradley G. Mullins
ICNU/200	Response Testimony of Bradley G. Mullins
ICNU/300	Cross-Answering Testimony of Bradley G. Mullins

The Affidavit of Bradley G. Mullins attesting to the truth and accuracy of the foregoing testimony and exhibit filings is attached. Parties have conferred on the prospect of each party filing individual motions for admission, with no objections against ICNU's motion having been communicated as of the time of this filing.

Dated this 5th day of October, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

Jesse E. Cowell

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 (telephone)

jec@dvclaw.com

Of Attorneys for the Industrial Customers of Northwest
Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
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UM 1802

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PUBLIC UTILITY COMMISSION OF
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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/200, and ICNU/300) on behalf of ICNU in this matter.
3. To the best of my knowledge, my pre-filed testimony and exhibit are true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 5th day of October, 2017.



BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 5th day of October, 2017.

State of Oregon, County of Multnomah
Rainbow Wainright

Notary Public for Oregon
My Commission Expires: 7/13/2018

