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July 20, 2010

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket UE 219 – In the Matter of PacifiCorp’s Application to Implement Provisions of Senate Bill 76.

Enclosed for filing in the above captioned docket are an original and one copy of PacifiCorp’s Motion to Admit Pre-filed Testimony, Exhibits, and Data Responses. A copy of this filing was served on all parties to this proceeding as indicated on the attached Certificate of Service.

Very truly yours,



Katherine McDowell

Enclosures

cc: Service list

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of the foregoing document in
3 UE 219 on the following named person(s) on the date indicated below by email and first-
4 class mail addressed to said person(s) at his or her last-known address(es) indicated below.

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DATED: July 20, 2010



Katherine McDowell

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 219**

4 In the Matter of PacifiCorp's Application
5 to Implement Provisions of Senate Bill 76.

**PACIFICORP'S MOTION TO ADMIT
PRE-FILED TESTIMONY, EXHIBITS,
AND DATA RESPONSES**

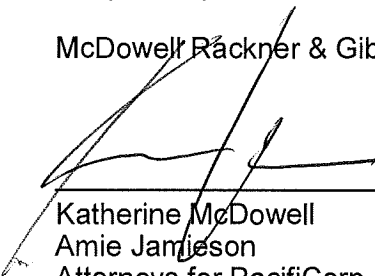
6
7 PacifiCorp moves for the following to be admitted into the record in this proceeding:

- 8
9 (1) the pre-filed testimony and exhibits of Dean S. Brockbank, Andrea L. Kelly, Cory E. Scott,
10 and R. Bryce Dalley, supported by affidavits attesting that their pre-filed testimony and
11 exhibits are true and correct; and
12 (2) the Industrial Customers of Northwest Utilities' Revised Responses to PacifiCorp's Data
13 Requests 1.1, 1.2, and 1.3.
14

15 DATED: July 20, 2010.

16 Respectfully submitted,

17 McDowell Rackner & Gibson PC

18 
19 Katherine McDowell
20 Amie Jamieson
Attorneys for PacifiCorp

21 PACIFICORP

22 Jordan A. White
23 Senior Counsel
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1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 219**

4 In the Matter of PacifiCorp's Application
5 to Implement Provisions of Senate Bill 76.

AFFIDAVIT OF DEAN S. BROCKBANK

6 STATE OF OREGON)
7) ss
8 County of Multnomah)

9 I, Dean S. Brockbank, being first duly sworn on oath, depose and say:

10 1. My full name is Dean S. Brockbank. I am employed by PacifiCorp Energy. My
11 present position is Vice President and General Counsel of PacifiCorp Energy.

12 2. I am the same Dean S. Brockbank that previously filed testimony and exhibits on
13 behalf of PacifiCorp in this matter. (See PPL/100, 101, 102, 103, and 104).

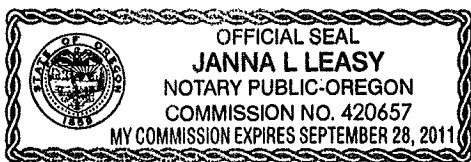
14 3. My pre-filed testimony and exhibits are true and accurate based on my
15 information and belief.

16 I declare under penalty of perjury under the laws of the state of Oregon that the
17 foregoing is true and correct based on my information and belief.

18
19 SIGNED this 20th day of July, 2010 at Portland, Oregon.

20
21 Signed: *Dean Brockbank*

22
23 SUBSCRIBED AND SWORN to before me this 20 day of July, 2010.



Janna L. Leasy
Notary Public, State of Oregon
My Commission Expires 9/28/11

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON
DOCKET NO. UE 219**

ICNU'S RESPONSE TO PACIFICORP'S DATA REQUEST NO. 1.1

Relating to the Direct Testimony of Randall J. Falkenberg (ICNU/100)

Data Request No. 1.1:

See ICNU/100, Falkenberg/3, lines 16-18. Other than the workpapers provided to PacifiCorp on June 2, 2010, please provide all evidence supporting the referenced testimony.

Response to Data Request No. 1.1:

ICNU objects on the basis that the request is overly broad, vague and ambiguous.

It is not possible to provide "all evidence" in support of Mr. Falkenberg's testimony as Mr. Falkenberg's testimony is based in part on his more than 25 years of experience in electric utility matters, including numerous PacifiCorp proceedings over nearly fifteen years. Mr. Falkenberg's testimony is also based on the information he reviewed in this proceeding, (Docket No. UE 219), including but not limited to testimony, discovery and workpapers. The specific statement at ICNU/100, Falkenberg/3, lines 16-18 is also supported by Mr. Falkenberg's other testimony in this proceeding, especially ICNU/100, Falkenberg/3, line 2 through ICNU/100, Falkenberg/6, line 5.

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON**

DOCKET NO. UE 219

ICNU'S RESPONSE TO PACIFICORP'S DATA REQUEST NO. 1.2

Relating to the Direct Testimony of Randall J. Falkenberg (ICNU/100)

Data Request No. 1.2:

See ICNU/100, Falkenberg/4, lines 9-11. Other than the workpapers provided to PacifiCorp on June 2, 2010, please provide all evidence supporting the referenced testimony.

Response to Data Request No. 1.2:

ICNU objects on the basis that the request is overly broad, vague and ambiguous.

It is not possible to provide "all evidence" in support of Mr. Falkenberg's testimony as Mr. Falkenberg's testimony is based in part on his more than 25 years of experience in electric utility matters, including numerous PacifiCorp proceedings over nearly fifteen years. Mr. Falkenberg's testimony is also based on the information he reviewed in this proceeding, (Docket No. UE 219), including but not limited to testimony, discovery and workpapers. The specific statement at ICNU/100, Falkenberg/4, lines 9-11 is also supported by Mr. Falkenberg's testimony in this proceeding, especially ICNU/100, Falkenberg/3, line 2 through ICNU/100, Falkenberg/6, line 5.

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON**

DOCKET NO. UE 219

ICNU'S RESPONSE TO PACIFICORP'S DATA REQUEST NO. 1.3

Relating to the Direct Testimony of Randall J. Falkenberg (ICNU/100)

Data Request No. 1.3:

See ICNU/100, Falkenberg/7, lines 2-5. Other than the workpapers provided to PacifiCorp on June 2, 2010, please provide all evidence supporting the reference testimony.

Response to Data Request No. 1.3:

ICNU objects on the basis that the request is overly broad, vague and ambiguous.

It is not possible to provide "all evidence" in support of Mr. Falkenberg's testimony as Mr. Falkenberg's testimony is based in part on his more than 25 years of experience in electric utility matters, including numerous PacifiCorp proceedings over nearly fifteen years. Mr. Falkenberg's testimony is also based on the information he reviewed in this proceeding, (Docket No. UE 219), including but not limited to testimony, discovery and workpapers. The specific statement at ICNU/100, Falkenberg/7, lines 2-5 is also supported by Mr. Falkenberg's testimony in this proceeding, especially ICNU/100, Falkenberg/6, line 6 to ICNU/100, Falkenberg/8, line 9.