## BEFORE THE

## PUBLIC UTILITY COMMISSION OF OREGON

| In the Matter of                  | UE 263   |
|-----------------------------------|--|
| PACIFICORP, dba PACIFIC POWER     | NOBLE AMERICAS ENERGY<br>SOLUTIONS LLC'S MOTION TO |
| Request for General Rate Revision | ADMIT TESTIMONY                                    |

Noble Americas Energy Solutions LLC ("Noble Solutions") hereby respectfully moves for admission of the following testimony in this matter:

Stipulating Parties/100-101: The pre-filed stipulation testimony of Kevin C. Higgins on behalf of the Stipulating Parties (Noble Americas Energy Solutions LLC; Fred Meyer Stores and Quality Food Centers, division of Kroger Co.; PacifiCorp dba Pacific Power; Public Utility Commission of Oregon Staff; the Citizens Utility Board of Oregon; and the Industrial Customers of Northwest Utilities; and Wal-Mart Stores, Inc.).

The original Affidavit of Mr. Higgins is attached in support of the veracity of the testimony and exhibits.

RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of September, 2013.

RICHARDSON ADAMS, PLLC

Gregory M. Adams (OSB No. 101779)

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Of Attorneys for the Noble Americas Energy Solutions LLC

**UE 263 MOTION TO ADMIT TESTIMONY** 

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23<sup>rd</sup> day of September, 2013, a true and correct copy of the within and foregoing NOBLE AMERICAS ENERGY SOLUTIONS LLC'S MOTION TO ADMIT TESTIMONY was served as follows:

| Deborah Garcia (C) Marianne Gardner (C) Public Utility Commission of Oregon PO Box 1088 Salem OR 97308-2148 deborah.garcia@state.or.us marianne.gardner@state.or.us | Hand DeliveryU.S. Mail, postage pre-paid FacsimileX_ Electronic Mail   |
|---|--|
| Michael Weirich (C) PUC Staff - Department of Justice 1162 Court Street, NE Salem OR 97301-4096 michael weirich@doj.state.or.us                                     | Hand Delivery U.S. Mail, postage pre-paid Facsimile X_ Electronic Mail   |
| G Catriona McCracken (C) Citizens' Utility Board of Oregon 610 SW Broadway Ste 400 Portland OR 97205 catriona@oregoncub.org dockets@oregoncub.org                   | <ul> <li>Hand Delivery</li> <li>U.S. Mail, postage pre-paid</li> <li>Facsimile</li> <li>Electronic Mail</li> </ul> |
| Irion Sanger Melinda J Davison Davison Van Cleve 333 SW Taylor Ste 400 Portland OR 97204 ias@dvclaw.com mjd@dvclaw.com  | Hand DeliveryU.S. Mail, postage pre-paidFacsimile X_Electronic Mail  |
| Regulatory & Cogeneration Services Inc<br>Donald W Schoenbeck<br>900 Washington St Ste 780<br>Vancouver WA 98660-3455   | Hand DeliveryU.S. Mail, postage pre-paid Facsimile X Electronic Mail   |

dws@r-c-s-inc.com

| Kevin Higgins (C) Energy Strategies LLC 215 State St Ste 200 Salt Lake City UT 84111-2322 khiggins@energystrat.com           | Hand Delivery U.S. Mail, postage pre-paid Facsimile X_ Electronic Mail |
|--|--|
| Sarah Wallace Pacific Power 825 NE Multnomah Ste 1800 Portland OR 97232 sarah.wallace@pacificorp.com                         | Hand DeliveryU.S. Mail, postage pre-paid FacsimileX_ Electronic Mail   |
| PacifiCorp dba Pacific Power 825 NE Multnomah St Ste 2000 Portland OR 97232 oregondockets@pacificorp.com                     | Hand DeliveryU.S. Mail, postage pre-paidFacsimile _X Electronic Mail   |
| Douglas C Tingey Portland General Electric 121 SW Salmon 1WTC13 Portland OR 97204 doug.tingey@pgn.com                        | Hand Delivery U.S. Mail, postage pre-paid Facsimile X_ Electronic Mail |
| Jay Tinker Portland General Electric 121 SW Salmon 1WTC-0702 Portland OR 97204 pge.opuc.filings@pgn.com                      | Hand DeliveryU.S. Mail, postage pre-paidFacsimile _X Electronic Mail   |
| Kurt J Boehm Jody Kyler Cohn Boehm Kurtz & Lowry 36 E Seventh St Ste 1510 Cincinnati OH 45202                                | Hand DeliveryU.S. Mail, postage pre-paidFacsimile X_Electronic Mail    |
| Samuel L Roberts Hutchinson Cox Coons Orr & Sherlock 777 High St Ste 200 PO Box 10886 Eugene OR 97440 sroberts@eugenelaw.com | Hand DeliveryU.S. Mail, postage pre-paid FacsimileX_ Electronic Mail   |

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| Hand DeliveryU.S. Mail, postage pre-paidFacsimile _X_Electronic Mail  |

Signed

Gregory M Adams

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**UE 263** 

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PACIFICORP d/b/a Pacific Power

AFFIDAVIT OF KEVIN HIGGINS

Request for General Rate Revision

I, KEVIN HIGGINS, being first duly sworn on oath, depose and say:

- 1. My name is Kevin Higgins. I am a Principal at Energy Strategies, LLC, a private consulting firm specializing in economic and policy analysis applicable to energy production, transportation, and consumption. I am testifying on behalf of The Kroger Co. ("Kroger") and Noble Americas Energy Solutions ("Noble Solutions").
- I filed testimony and associated exhibits (Joint Testimony in Support of Stipulation/100) on behalf of Kroger and Noble Solutions in this matter.
- 3. To the best of my knowledge, my 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, 2013.

KEVINHIGGINS

SUBSCRIBED AND SWORN to before me this 10 day of September, 2013.

Notary Public
DANIKA HOLMES
Commission #606101
My Commission Expires
February 07, 2015
State of Utah

Notary Public for Utah

My Commission Expires: 02.07.2015