# BEFORE THE PUBLIC UTILITY COMMISSION

### OF OREGON

### **UM 1722**

In the Matter of	) ) NORTHWEST INDUSTRIAL GAS
PUBLIC UTILITY COMMISSION OF OREGON,	USERS MOTION TO ADMIT PRE- FILED TESTIMONY AND EXHIBITS OF EDWARD A. FINKLEA
Investigation into Recovery of Safety Costs by Natural Gas Utilities.	) ) )

Northwest Industrial Gas Users' ("NWIGU") respectfully requests that Administrative Law Judge Rowe admit NWIGU's Pre-Filed Exhibits in this docket into the record:

NWIGU 100 Opening Testimony

NWIGU 101 Qualifications

The above-referenced exhibits were previously filed with the Commission and support NWIGU's testimony in this docket. The declaration of Edward A. Finklea attesting to the truthfulness of these exhibits is attached to this motion.

Dated this  $27^{n}$  day of February 2017.

CABLE HUSTON LLP

Chad M. Stokes, OSB No. 004007 Tommy A. Brooks, OSB No. 076071 1001 SW 5<sup>th</sup> Avenue, Suite 2000

Portland, OR 97204

Telephone: (503) 224-3092

Facsimile: (503) 224-3176 E-Mail: cstokes@cableh

cstokes@cablehuston.com tbrooks@cablehuston.com

Of Attorneys for

Northwest Industrial Gas Users

## BEFORE THE PUBLIC UTILITY COMMISSION

### OF OREGON

## UM 1722

In the Matter of

PUBLIC UTILITY COMMISSION OF OREGON,

Investigation into Recovery of Safety Costs by Natural Gas Utilities.

DECLARATION OF EDWARD A. FINKLEA

I, Edward A. Finklea, declare under penalty of perjury under the laws of the State of Oregon:

- 1. My name is Edward A. Finklea. I am the Executive Director of the Northwest Industrial Gas Users ("NWIGU").
- 2. I sponsored the following exhibits on behalf of Northwest Industrial Gas Users: NWIGU/100 through NWIGU/101.
- 3. My testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these questions today, my responses would be the same.

I hereby declare that the above statements are true to be best of my knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

Dated this 23rd day of February, 2017.

Edward A Finkles