

KATHERINE A. McDowell Direct (503) 595-3924 katherine@mcd-law.com

September 8, 2006

VIA ELECTRONIC FILING

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

Re:

In the Matter of Pacific Power & Light (d/b/a PacifiCorp) Request for a General Rate Increase in the Company's Oregon Annual Revenues

Docket No. UE 179

Enclosed for filing in the above-referenced proceeding is the Motion of PacifiCorp to Admit Testimony and supporting Affidavits. A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

∕Katherin∉ Á. McDowell

Enclosures

cc: Service List

•		UTILITY COMMISSION REGON
2	UE 179	
3		1
4	In the Matter of	
	PACIFIC POWER & LIGHT, d/b/a PacifiCorp	MOTION OF PACIFICORP TO ADMIT TESTIMONY
7	Request for a General Rate Increase in the	
8		
9	PacifiCorp moves to admit into the rec	ord the following testimony and exhibits:
10	 Direct Testimony of Andrew N. 	MacRitchie (PPL/100)
11	 Direct Testimony and Exhibits 	of Samuel C. Hadaway (PPL/200-206)
12	Direct Testimony and Exhibits	of Bruce N. Williams (PPL/300-304)
13	Direct Testimony and Exhibits	of Reed C. Davis (PPL/400-401)
14 15	• Direct restimony and Exhibits,	Supplemental Testimony and Exhibits, and so of Mark T. Widmer (PPL/500-508)
16	Direct Testimony and Exhibits of the control o	of Mark R. Tallman (PPL/600-602)
17	 Direct Testimony of Barry G. Cunningham (PPL/700) 	
18	Direct Testimony and Exhibits of the control o	of Daniel J. Rosborough (PPL/800-804)
19	 Direct Testimony and Exhibits of 	of Paul N. Wrigley (PPL/900-901)
20	 Direct Testimony and Exhibits of 	of Karl D. Anderberg (PPL/100-1007)
21	 Direct Testimony and Exhibits of 	of William R. Griffith (PPL/1100-1103)
22	Rebuttal Testimony of John A. A.	Apperson (PPL/1200)
23	 Rebuttal Testimony of Mark Ma 	nsfield (PPL/1300)
24	In support of this motion, attached as E	xhibit A are witness affidavits supporting
25	PacifiCorp's pre-filed testimony and exhibits.	
	being filed directly with the Commission by Mr.	

1	In addition, PacifiCorp moves to admit the J	loint Testimony and Exhibits in Support of
2	Stipulation (Joint Parties/100-102).	
3	In support of this motion, PacifiCorp submits	s Paul Wrigley's affidavit in Exhibit A and
4	the affidavit of Andrea Fogue in support of the Joint	t Testimony in Exhibit B. Other witnesses
5	to the Joint Testimony have separately submitted s	upporting affidavits for this testimony.
6	DATED: September 8, 2006. MCDOV	VELL & ASSOCIATES PC
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8		2/2
9	/	ne A. McDowell
10.	Attorney	s for PacifiCorp
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UE 179
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4	In the Matter of
5 6	PACIFIC POWER & LIGHT, d/b/a PacifiCorp AFFIDAVIT OF STAN WATTERS
7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.
8	
9	I, Stan Watters, being first duly sworn on oath, depose and say:
10	1. My full name is Stan Watters. I am employed by PacifiCorp as President of
11	Pacific Power.
12	2. I hereby adopt the pre-filed testimony of Andrew N. MacRitchie filed February
13	2006 on behalf of PacifiCorp in the above-referenced docket.
14	3. The pre-filed direct testimony of Andrew N. MacRitchie (PPL/100) is true and
15	accurate, and no corrections need to be made. If I were asked the same questions my
16	answers would be the same.
17	I declare under penalty of perjury under the laws of the state of Oregon that the
18.	foregoing is true and correct based on my information and belief.
19	SIGNED this 7th day of September 2006, at Portland, Oregon.
20	City/State
21	Signed: Man Mall
22	
23 .	SUBSCRIBED AND SWORN to before me this day of September 2006.
24	OFFICIAL SEAL
25	TIA M. HUGHES NOTARY PUBLIC-OREGON COMMISSION NO. 385385
26	COMMISSION NO. 385385 MY COMMISSION EXPIRES OCTOBER 29, 2008 Notary Public - Oregon

Page 1 - WITNESS AFFIDAVIT (Watters)

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Public Utility Commission of Oregon Administrative Hearing Division

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2	UE 179	
3	JE II.a	
4	In the Matter of	
5	PACIFIC POWER & LIGHT, d/b/a PacifiCorp	AFFIDAVIT OF SAMUEL C. HADAWAY
6 7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.	
8		
9	I, Samuel C. Hadaway, being first du	ly sworn on oath, depose and say:
10	1. My full name is Samuel C. Ha	adaway. I am employed by FINANCO, Inc.
11	2. I sponsored pre-filed testimor	ny and exhibits on behalf of PacifiCorp in the
12	above-referenced docket.	
13	3. My pre-filed direct testimony	(PPL/200) and exhibits (PPL/201-206) are true
14	and accurate, and no corrections need to be made. If I were asked the same questions	
15	today, my answers would be the same.	
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	SIGNED this 7th day of September	2006, at <u>Austin, TX</u> . City/State
19		City/State
20		Signed: <u>Samuel (. Hadawa</u>
21		
22	SUBSCRIBED AND SWORN to before	re me thisday of September 2006.
23		
24	NOBUE SUSIE BROWN My Commission Penisse	Motor Bublic Town
25	January 31, 2008	Notary Public – Texas
26		

Page 1 - WITNESS AFFIDAVIT (Hadaway)

1	OF OREGON
3	UE 179
4	
7	I, Bruce N. Williams, being first duly sworn on oath, depose and say:
8	1. My full name is Bruce N. Williams. I am employed by PacifiCorp as
9	Treasurer.
10	2. I sponsored pre-filed testimony and exhibits on behalf of PacifiCorp in the
11	above-referenced docket.
12	3. I also hereby adopt the pre-filed testimony and exhibits of Daniel J.
13	Rosborough filed February 2006 on behalf of PacifiCorp in the above-referenced docket.
14	4. My pre-filed direct testimony (PPL/300) and exhibits (PPL/301-304) as well as
15	the pre-filed direct testimony of Daniel J. Rosborough (PPL/800) and exhibits (PPL/801-804)
16	are true and accurate, and no corrections need to be made. If I were asked the same
17	questions today, my answers would be the same.
18.	I declare under penalty of perjury under the laws of the state of Oregon that the
19	foregoing is true and correct based on my information and belief.
20	SIGNED this 75 day of September 2006, at Portion, Orcgon.
21	City/State
22	Signed: Buce N William
23	
24	SUBSCRIBED AND SWORN to before me this day of September 2006.
25	C Ol III.
26	OFFICIAL SEAL SUSAN PHILLIPS NOTARY PUBLIC-OREGON OFFICIAL SEAL Notary Public — Oregon

Page 1

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
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3	
4	In the Matter of
5	PACIFIC POWER & LIGHT, d/b/a PacifiCorp AFFIDAVIT OF REED C. DAVIS
7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.
8	
9	I, Reed C. Davis, being first duly sworn on oath, depose and say:
10	1. My full name is Reed C. Davis. I am employed by PacifiCorp as Director of
11	Planning, Load and Revenue Forecasting.
12	2. I sponsored pre-filed testimony and exhibits on behalf of PacifiCorp in the
13	above-referenced docket.
14	3. My pre-filed direct testimony (PPL/400) and exhibit (PPL/401) are true and
15	accurate, and no corrections need to be made. If I were asked the same questions today,
16	my answers would be the same.
17	I declare under penalty of perjury under the laws of the state of Oregon that the
18	foregoing is true and correct based on my information and belief.
19	SIGNED this 7 day of September 2006, at Partland / DR.
20	City/State (
21	Signed: Leed (4)
22	
23 .	SUBSCRIBED AND SWORN to before me this day of September 2006.
24	
25	OFFICIAL SEAL SUSAN PHILLIPS NOTARY PUBLIC OREGON Susan Phillips NOTARY PUBLIC OREGON
26	COMMISSION NO. 379284 Notary Public — Oregon MY COMMISSION EXPIRES APR. 23, 2008

Page 1 - WITNESS AFFIDAVIT (Davis)

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UE 179
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4	In the Matter of
5 6	PacifiCorp MARK T. WIDMER
7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.
8	
9	
	I, Mark T. Widmer, being first duly sworn on oath, depose and say:
10	1. My full name is Mark T. Widmer. I am employed by PacifiCorp as Director,
11	Net Power Costs.
12	2. I sponsored pre-filed testimony and exhibits on behalf of PacifiCorp in the
13	above-referenced docket.
14	3. My pre-filed direct testimony (PPL/500) and exhibits (PPL/501-502),
15	supplemental direct testimony (PPL/503) and exhibits (PPL/504-505), and rebuttal testimony
16	(PPL/506) and exhibits (PPL/507-508) are true and accurate, and no corrections need to be
17	made. If I were asked the same questions today, my answers would be the same.
18	I declare under penalty of perjury under the laws of the state of Oregon that the
19	foregoing is true and correct based on my information and belief.
20	SIGNED this 7 day of September 2006, at Portland OR.
21	City/State
	M_{1}/L
22	Signed: ///www.
23 .	SUBSCRIBED AND SWORN to before me this day of September 2006.
24	
25	OFFICIAL SEAL SUSAN PHILLIPS NOTABLE PRINCIPLE OFFICIAL SUSAN PHILLIPS
26	NOTARY PUBLIC-OREGON Notary Public Oregon COMMISSION NO. 379284 MY COMMISSION FOR THE PROPERTY APPLICATION OF TH

Page 1 - WITNESS AFFIDAVIT (Widmer)

1		UTILITY COMMISSION REGON	
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4	In the Matter of		
5	PACIFIC POWER & LIGHT, d/b/a PacifiCorp	AFFIDAVIT OF MARK R. TALLMAN	
6	Request for a General Rate Increase in the	WAIK IX IXEEWAY	
7	Company's Oregon Annual Revenues.		
8			
9	I, Mark R. Tallman, being first duly swo	orn on oath, depose and say:	
10	My full name is Mark R. Tallma	n. I am employed by PacifiCorp as Managing	
11	Director of Trading & Origination, Commercial	& Irading: Renewable Resource Acquisition	
12	2. I sponsored pre-filed testimony	and exhibits on behalf of PacifiCorp in the	
13	above-referenced docket.		
14	3. My pre-filed direct testimony (P	PL/600) and exhibits (PPL/601-602) are true	
15	and accurate, and no corrections need to be made. If I were asked the same questions		
16	of today, my answers would be the same.		
17	I declare under penalty of perjury unde	r the laws of the state of Oregon that the	
18	foregoing is true and correct based on my info	rmation and belief.	
19	SIGNED this 2 day of September 2	2006, at Portland, Oregon	
20		City/State	
21	Signed: Man N M		
22	Control of the Contro		
23	SUBSCRIBED AND SWORN to before	e me this 8th day of September 2006.	
24			
25	OFFICIAL SEAL JENNIFER L FRY	Och 3	
26	NOTARY PUBLIC-OREGON COMMISSION NO. 369588 MY COMMISSION EXPIRES JULY 12, 2007	Notary Public - gregon	

Page 1 - WITNESS AFFIDAVIT (Tallman)

1		UTILITY COMMISSION REGON
2	· · · · · · · · · · · · · · · · · · ·	: 179
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4	In the Matter of	
5 6	PACIFIC POWER & LIGHT, d/b/a PacifiCorp	AFFIDAVIT OF PAUL M. WRIGLEY
7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.	
8		
9	I, Paul M. Wrigley, being first duly swo	rn on oath, depose and say:
10	My full name is Paul M. Wrigle	y. I am employed by PacifiCorp as a Director
11	in the Regulation Department.	
12	2. I sponsored pre-filed testimony	and exhibits on behalf of PacifiCorp in the
13	above-referenced docket. Additionally, I was	a member of the panel of witnesses who
14	sponsored joint testimony in support of the St	pulation in this case.
15	3. My pre-filed direct testimony (F	PL/900) and exhibits (PPL/901-902) are true
16	and accurate, and no corrections need to be r	nade. The same is true with respect to the
17	pre-filed joint testimony (Joint Parties/100) and	d exhibits (Joint Parties/101-102). If I were
18	asked the same questions today, my answers	would be the same.
19	l declare under penalty of perjury unde	or the laws of the state of Oregon that the
20	foregoing is true and correct based on my info	rmation and belief.
21	SIGNED this 7 day of September 2	2006, at PORTLAND ORE EOW
22		City/State
23	S	igned: Kal M.
24	SUBSCRIBED AND SWORN to before	me thisday of September 2006.
25	OFFICIAL SEAL	
26	TIA M. HUGHES NOTARY PUBLIC-OREGON COMMISSION NO. 385385 MY COMMISSION EXPIRES OCTOBER 29, 2008	Notary Public – Oregon
Page		MaDawall & Aggariates DC

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
3	UE 179
4	In the Matter of
5	PACIFIC POWER & LIGHT, d/b/a PacifiCorp AFFIDAVIT OF KARL D. ANDERBERG
7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.
8	
9	I, Karl D. Anderberg, being first duly sworn on oath, depose and say:
10	1. My full name is Karl D. Anderberg. I am employed by PacifiCorp a
11	Regulatory Manager.
12	2. I sponsored pre-filed testimony and exhibits on behalf of PacifiCorp in the
13	above-referenced docket.
14	3. My pre-filed direct testimony (PPL/1000) and exhibits (PPL/1001-1007) are
15	true and accurate, and no corrections need to be made. If I were asked the same questions
16	today, my answers would be the same.
1,7	I declare under penalty of perjury under the laws of the state of Oregon that the
18	foregoing is true and correct based on my information and belief.
	SIGNED this 7th day of September 2006, at Portland, Oregon City/State
20	20901
21	Signed: No. Alleger
22	
23	SUBSCRIBED AND SWORN to before me this day of September 2006.
24 25	OFFICIAL SEAL TIA M. HUGHES NOTARY PUBLIC-OREGON
26	Notary Public – Oregon

Page 1 - WITNESS AFFIDAVIT (Anderberg)

] [1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UE 179
3	
4	In the Matter of
	PACIFIC POWER & LIGHT, d/b/a PacifiCorp AFFIDAVIT OF WILLIAM R. GRIFFITH
7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.
8	
9	I, William R. Griffith, being first duly sworn on oath, depose and say:
10	1. My full name is William R. Griffith. I am employed by PacifiCorp as Director,
11	Pricing & Cost of Service in the Regulation Department.
12	2. I sponsored pre-filed testimony and exhibits on behalf of PacifiCorp in the
13	above-referenced docket.
14	3. My pre-filed direct testimony (PPL/1100) and exhibits (PPL/1101-1103) are
15	true and accurate, and no corrections need to be made. If I were asked the same questions
16	today, my answers would be the same.
17	I declare under penalty of perjury under the laws of the state of Oregon that the
18:	foregoing is true and correct based on my information and belief.
19	SIGNED this day of September 2006, at OR City/State
20	
21	Signed: Whit. I hiffet
22	Lu
23 .	SUBSCRIBED AND SWORN to before me this day of September 2006.
24	OFFICIAL SEAL
25	TIA M. HUGHES NOTARY PUBLIC-OREGON COMMISSION NO. 385385
26	MY COMMISSION NO. 383383 Notary Public - Oregon

Page 1 - WITNESS AFFIDAVIT (Griffith)

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
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4	In the Matter of
5	PacifiCorp JOHN A. APPERSON
6 7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.
8	
9	I, John A. Apperson, being first duly sworn on oath, depose and say:
10	My full name is John A. Apperson. I am employed by PacifiCorp as a
11	Director, Energy Trading.
12	2. I sponsored pre-filed testimony and exhibits on behalf of PacifiCorp in the
13	above-referenced docket.
14	3. My pre-filed direct testimony (PPL/1200) is true and accurate, and no
15	corrections need to be made. If I were asked the same questions today, my answers would
16	be the same.
17	I declare under penalty of perjury under the laws of the state of Oregon that the
18	foregoing is true and correct based on my information and belief.
19	SIGNED this
20	City/State
21	Signed: Tole A Region of the second of the s
22	
23	SUBSCRIBED AND SWORN to before me this day of September 2006.
24	
25	OFFICIAL SEAL SUSAN PHILLIPS Notary Public - Oregon
26	NOTARY PUBLIC-OREGON COMMISSION NO. 379284 MY COMMISSION FYRIPES APP.

WITNESS AFFIDAVIT (Apperson)

Page 1

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2	UE 179	
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4	In the Matter of	
5 6	PacifiCorp	AFFIDAVIT OF MARK MANSFIELD
7	Request for a General Rate Increase in the Company's Oregon Annual Revenues.	
8		
9	I, Mark Mansfield, being first duly swor	n on oath, depose and say:
10	My full name is Mark Mansfield. I am employed by PacifiCorp Energy as	
11	Vice-President of Safety, Environmental and Operations Support.	
12	2. I sponsored pre-filed testimony and exhibits on behalf of PacifiCorp in the	
13	above-referenced docket. I also adopt the pre-filed testimony of Barry G. Cunningham filed	
14	February 2006 on behalf of PacifiCorp in the above-referenced docket.	
15	 My pre-filed direct testimony (P 	PL/1300) is true and accurate, and no
16	corrections need to be made. Additionally, the pre-filed direct testimony of Barry G.	
17	Cunningham (PPL/700) is true and accurate, and no corrections need to be made. If I were	
18	asked the same questions my answers would be the same.	
19	I declare under penalty of perjury under the laws of the state of Oregon that the	
20	foregoing is true and correct based on my information and belief.	
21	SIGNED this 7 day of September 2006, at Salt Lake (TY UTM!	
22	City/State	
23	Signed: M	
24	SUBSCRIBED AND SWORN to before me this day of September 2006.	
25	Notary Public PATRICIA DAY 1407 West North Temple, Suite 210a	DA · · · ·
26	Salt Lake City, Utah 84116 My Commission Expires March 15, 2010 State of Utah	Notary Public – Utah
Page	1 - WITNESS AFFIDAVIT (Mansfield)	

Exhibit B

I	DEFORE THE PUBLIC UTILITY COMMISSION	
2	OF OPECON	
3 4	OF OREGON	
5	UE 179	
6 7	In the Matter of PACIFICORP PACIFICORP Request for a General Rate Increase in the Company's Oregon Annual Revenues. AFFIDAVIT OF ANDREA FOGUE	
8 9 10 11	State of Oregon)) ss. County of Marion)	
12	I, Andrea Fogue, being first duly sworn on oath, depose and say as follows:	
13 14 15 16 17 18 19 20	 My name is Andrea Fogue. I am employed by the League of Oregon Cities ("LOC") as Senior Staff Associate. I am appearing in this proceeding as a witness for the LOC. My business address is: 1201 Court Street NE, Suite 200, Salem, Oregon 97301. In connection with the above-captioned proceeding and acting on behalf of the LOC, I sponsored joint testimony along with Ed Durrenberger, Paul Wrigley, Bob Jenks, James Selecky, Kevin Higgins, David Tooze and Donald Schoenbeck. Our joint testimony was the flad and marked as Leist Particulation. 	
21 22 23 24 25 26	 pre-filed and marked as Joint Parties/100. My witness qualification statement was also pre-filed and marked as Joint Parties/101. 3. My pre-filed testimony and exhibit are true and accurate. To the best of my knowledge there are no corrections necessary. If I were asked the same questions today, my answers would be the same. 	
27 28	Andrea Fogue Andrea Fogue	
29 30	SUBSCRIBED AND SWORN TO before me thisth day of September, 2006.	
31 32 33 34	NOTARY PUBLIC FOR OREGON	
35 36	My Commission Expires: 2 - 4 - 07 OFFICIAL SEAL WANDA HULBERT NOTARY PUBLIC - OREGON COMMISSION NO. 363988 MY. COMMISSION EXPIRES EEBRUARY 4, 2007	

CERTIFICATE OF SERVICE

2	I hereby certify that I served a true and correct copy of the foregoing document in
3	Docket UE 179 on the following named person(s) on the date indicated below by email and
4	first-class mail addressed to said person(s) at his or her last-known address(es) indicated
5	below.
6	Rates & Regulatory Affairs Jim Abrahamson
7	Portland General Electric Community Action Directors 121 SW Salmon Street, 1WTC0702 of Oregon
8	Portland, OR 97204 4035 12th Street Cutoff SE, Suite 110 pge.opuc.filings@pgn.com Salem, OR 97302
9	jim@cado-oregon.org
0	Kurt Boehm Melinda J. Davison Boehm Kurtz & Lowry Davison Van Cleve, PC

Boehm Kurtz & Lowry 36 E. Seventh Street, Suite 1510 Cincinnati, OH 45202 kboehm@bkllawfirm.com	Davison Van Cleve, PC 333 SW Taylor, Suite 400 Portland, OR 97204 mail@dvclaw.com
lim Dosson	Colorada States

Edward Finklea
Cable Huston Benedict Haagensen
& Lloyd LLP
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204
efinklea@chbh.com

16	Andrea Fogue	Biohand Cres
	•	Richard Gray
17	League of Oregon Cities	<u>richard.gray@pdxtrans.org</u>
17	PO Box 928	·
	1201 Court Street NE, Suite 200	

18	Salem, OR 97308 afogue@orcities.org	
19	arogae a oranies, org	
20	Jason W. Jones Department of Justice 1162 Court Street NE	Michael Kurtz Boehm, Kurtz & Lowry 36 E. Seventh Street, Suite 1510
21 22	Salem, OR 97301-4096 jason.w.jones@state.or.us	Cincinnati, OH 45202-4454 mkurtz@bkllawfirm.com
23	Richard Lorenz Cable Huston Benedict Haagensen	OPUC Dockets Citizens' Utility Board of Oregon

& Lloyd LLP
4 1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204
Portland, OR 97204
Portland, OR 97204
Portland, OR 97205

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1	Lon L. Peters	Irion A. Sanger
2	lpeters@pacifier.com	Davison Van Cleve 333 SW Taylor, Suite 400
3		Portland, OR 97204 ias@dvclaw.com
4	James T. Soloeku	
5	James T. Selecky Brubaker & Associates, Inc. 1215 Fern Ridge Pkwy, Suite 208	Karl Hans Tanner Oregon Energy Coordinators Assoc. 2448 W. Harvard Blvd.
6	St. Louis, MO 63141 itselecky@consultbai.com	Roseburg, OR 97470
7		karl.tanner@ucancap.org
8	Douglas Tingey Portland General Electric 121 SW Salmon, 1WTC13	David Tooze dtooze@ci.portland.or.us
9	Portland, OR 97204	
10	doug.tingey@pgn.com	
11	Benjamin Walters <u>bwalters@ci.portland.or.us</u>	Michael T. Weirich Department of Justice
12		Regulated Utility & Business Section 1162 Court Street, NE
13		Salem, OR 97301-4096 michael.weirich@doj.state.or.us
14	DATED: September 8, 2006.	
15		
16		/h // u
17		Control of Attorneys for PacifiCorp
18		Of Automeys for Pacificorp
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