

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 179

In the Matter of)	
)	
PACIFIC POWER & LIGHT)	MOTION TO ADMIT TESTIMONY
(dba PACIFICORP))	AND AFFIDAVITS OF THE
)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
Request for a General Rate Increase in the)	
<u>Company's Oregon Annual Revenues</u>)	

Pursuant to Administrative Law Judge Kirkpatrick's August 28, 2006

Memorandum, the Industrial Customers of Northwest Utilities ("ICNU") hereby petitions the Oregon Public Utility Commission to admit into the record all of ICNU's pre-filed testimony and exhibits of Randall J. Falkenberg, Michael P. Gorman, Kathryn E. Iverson, and James T. Selecky. In support of this motion, ICNU provides the attached affidavits of each witness.

Dated this 8th day of September, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Irion Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

mail@dvclaw.com

Of Attorneys for the Industrial Customers of
Northwest Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 179

In the Matter of)	
)	AFFIDAVIT OF RANDALL J.
PACIFIC POWER & LIGHT)	FALKENBERG
(dba PACIFICORP))	
)	
Request for a General Rate Increase in the)	
Company's Oregon Annual Revenues)	
_____)	

1 I, Randall J. Falkenberg, being first duly sworn on oath, depose and say:

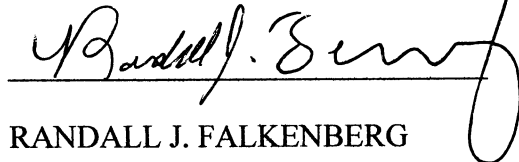
2 1. My full name is Randall J. Falkenberg. I am a utility regulatory consultant and
3 President of RFI Consulting, Inc. I am appearing in this proceeding as a witness for the
4 Industrial Customers of Northwest Utilities ("ICNU"). My business address is: PMB 362, 8343
5 Roswell Road, Sandy Springs, GA 30350-2812.

6 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public
7 Utility Commission Docket No. UE 179. Specifically, my pre-filed direct testimony and exhibits
8 on power cost issues were filed on June 30, 2006, and my pre-filed direct testimony and exhibits
9 on non-power cost issues were filed on July 12, 2006.

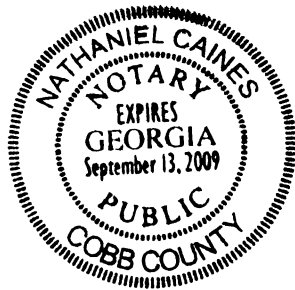
10 3. My testimony and exhibits that were previously filed are true and accurate, and no
11 corrections need to be made. If I were asked the same questions today, my answers would be the
12 same.

1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 5th day of September, 2006, at Sandy Springs, Georgia.

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7 
8 RANDALL J. FALKENBERG

9 SUBSCRIBED AND SWORN to before me this 5th day of September, 2006.




14 NOTARY PUBLIC FOR GEORGIA

My Commission Expires: September 13, 2009

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 179

In the Matter of)	
)	AFFIDAVIT OF JAMES T. SELECKY
PACIFIC POWER & LIGHT)	
(dba PACIFICORP))	
)	
Request for a General Rate Increase in the)	
Company's Oregon Annual Revenues)	
_____)	

1 I, James T. Selecky, being first duly sworn on oath, depose and say:

2 1. My full name is James T. Selecky. I am a consultant in the field of public utility
3 regulation and employed by the firm of Brubaker & Associates, Inc., regulatory and economic
4 consultants with corporate headquarters in St. Louis, Missouri. I am appearing in this
5 proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU"). My
6 business address is: 1215 Fern Ridge Parkway, Suite 208, St. Louis, MO 63141-2000.

7 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public
8 Utility Commission Docket No. UE 179. Specifically, my pre-filed direct testimony and exhibits
9 were filed on July 12, 2006, and my joint testimony and exhibits in support of the stipulation
10 were filed on August 21, 2006.

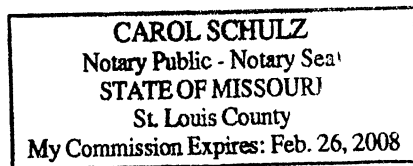
11 3. My testimony and exhibits that were previously filed are true and accurate, and no
12 corrections need to be made. If I were asked the same questions today, my answers would be the
13 same.

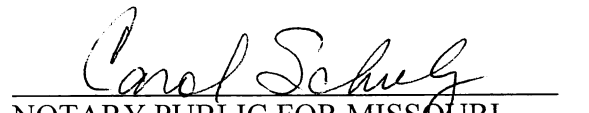
1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 6th day of September, 2006, at St. Louis, Missouri.

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8 JAMES T. SELECKY

9 SUBSCRIBED AND SWORN to before me this 6th day of September, 2006.




NOTARY PUBLIC FOR MISSOURI
My Commission Expires: 2/26/2008

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 179

In the Matter of)	
)	AFFIDAVIT OF MICHAEL P. GORMAN
PACIFIC POWER & LIGHT)	
(dba PACIFICORP))	
)	
Request for a General Rate Increase in the)	
Company's Oregon Annual Revenues)	
_____)	

1 I, Michael P. Gorman, being first duly sworn on oath, depose and say:

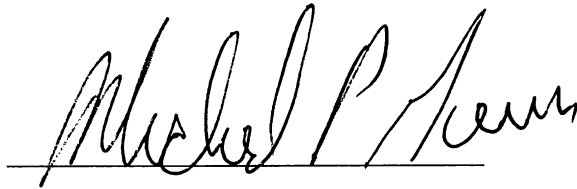
2 1. My full name is Michael P. Gorman. I am a consultant in the field of public
3 utility regulation and a principal in the firm of Brubaker & Associates, Inc., regulatory and
4 economic consultants with corporate headquarters in St. Louis, Missouri. I am appearing in this
5 proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU"). My
6 business address is: 1215 Fern Ridge Parkway, Suite 208, St. Louis, MO 63141-2000.

7 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public
8 Utility Commission Docket No. UE 179. Specifically, my pre-filed direct testimony and exhibits
9 were filed on July 12, 2006.

10 3. My testimony and exhibits that were previously filed are true and accurate, and no
11 corrections need to be made. If I were asked the same questions today, my answers would be the
12 same.

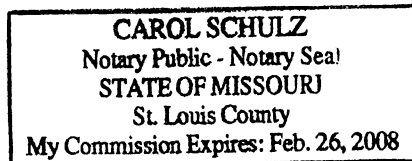
1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 6th day of September, 2006, at St. Louis, Missouri.

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8 MICHAEL P. GORMAN

9 SUBSCRIBED AND SWORN to before me this 6th day of September, 2006.




NOTARY PUBLIC FOR MISSOURI

My Commission Expires: 2/26/2008

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 179

In the Matter of)	
)	AFFIDAVIT OF KATHRYN E. IVERSON
PACIFIC POWER & LIGHT)	
(dba PACIFICORP))	
)	
Request for a General Rate Increase in the)	
Company's Oregon Annual Revenues)	
_____)	

1 I, Kathryn E. Iverson, being first duly sworn on oath, depose and say:

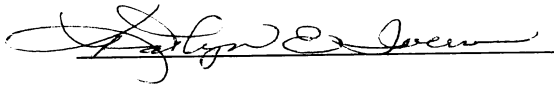
2 1. My full name is Kathryn E. Iverson. I am a consultant in the field of public utility
3 regulation and employed by the firm of Brubaker & Associates, Inc., regulatory and economic
4 consultants with corporate headquarters in St. Louis, Missouri. I am appearing in this
5 proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU"). My
6 business address is: 17244 W. Cordova Court, Surprise, AZ 85387.

7 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public
8 Utility Commission Docket No. UE 179. Specifically, my pre-filed direct testimony and exhibits
9 were filed on July 12, 2006.

10 3. My testimony and exhibits that were previously filed are true and accurate, and no
11 corrections need to be made. If I were asked the same questions today, my answers would be the
12 same.

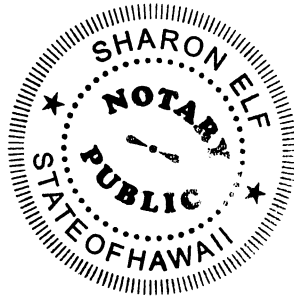
1 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
2 OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
3 AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

4 SIGNED THIS 5th day of September, 2006, at Kahului, Hawaii.

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8 KATHRYN E. IVERSON

9 SUBSCRIBED AND SWORN to before me this 5 day of September, 2006.




NOTARY PUBLIC FOR HAWAII

My Commission Expires: _____

SHARON ELF
Expiration Date: October 2, 2009

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 S.W. Taylor
Portland, OR 97204

September 8, 2006

Via Electronic and US Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of PACIFIC POWER & LIGHT Request for a
General Rate Increase in the Company's Oregon Annual Revenues
Docket No. UE 179

Dear Filing Center:

Enclosed please find an original and two copies of the Motion to Admit
Testimony and Affidavits on behalf of the Industrial Customers of Northwest Utilities ("ICNU")
in the above-referenced docket.

Please return one copy of the documents in the enclosed, postage-prepaid
envelope. Thank you for your assistance.

Sincerely,

/s/ Christian Griffen
Christian W. Griffen

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Motion to Admit Testimony and Affidavits on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail to those parties who waived paper service.

Dated at Portland, Oregon, this 8th day of September, 2006.

/s/ Christian Griffen
Christian W. Griffen

JIM DEASON
ATTORNEY AT LAW
521 SW CLAY ST STE 107
PORTLAND OR 97201-5407
jimdeason@comcast.net

BOEHM KURTZ & LOWRY
MICHAEL L KURTZ
36 E 7TH ST STE 1510
CINCINNATI OH 45202-4454
mkurtz@bklawfirm.com

CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP
EDWARD A FINKLEA
1001 SW 5TH - STE 2000
PORTLAND OR 97204
efinklea@chbh.com

CITIZENS' UTILITY BOARD OF OREGON
OPUC DOCKETS
610 SW BROADWAY STE 308
PORTLAND OR 97205
dockets@oregoncub.org

DEPARTMENT OF JUSTICE
JASON W JONES
ASSISTANT ATTORNEY GENERAL
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
jason.w.jones@state.or.us

BOEHM KURTZ & LOWRY
KURT J BOEHM
ATTORNEY
36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bklawfirm.com

BRUBAKER & ASSOCIATES INC
JAMES T SELECKY
1215 FERN RIDGE PKWY - STE 208
ST. LOUIS MO 63141
jtselecky@consultbai.com

CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP
RICHARD LORENZ
1001 SW FIFTH AVE - STE 2000
PORTLAND OR 97204-1136
rlorenz@chbh.com

COMMUNITY ACTION DIRECTORS OF OREGON
JIM ABRAHAMSON
COORDINATOR
PO BOX 7964
SALEM OR 97303-0208
jim@cado-oregon.org

DEPARTMENT OF JUSTICE
MICHAEL T WEIRICH
ASSISTANT ATTORNEY GENERAL
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@doj.state.or.us

LEAGUE OF OREGON CITIES

ANDREA FOGUE
SENIOR STAFF ASSOCIATE
PO BOX 928
1201 COURT ST NE STE 200
SALEM OR 97308
afogue@orcities.org

NORTHWEST ECONOMIC RESEARCH INC

LON L PETERS
607 SE MANCHESTER PLACE
PORTLAND OR 97202
lpeters@pacifier.com

PACIFICORP

LAURA BEANE
MANAGER, REGULATORY
825 MULTNOMAH STE 300
PORTLAND OR 97232
laura.beane@pacificorp.com

**PORTLAND CITY OF - OFFICE OF
TRANSPORTATION**

RICHARD GRAY
STRATEGIC PROJECTS MGR/SMIF ADMINISTRATOR
1120 SW 5TH AVE RM 800
PORTLAND OR 97204
richard.gray@pdxtrans.org

PORTLAND GENERAL ELECTRIC

RATES & REGULATORY AFFAIRS
RATES & REGULATORY AFFAIRS
121 SW SALMON ST 1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

MCDOWELL & ASSOCIATES PC

KATHERINE A MCDOWELL
ATTORNEY
520 SW SIXTH AVE - SUITE 830
PORTLAND OR 97204
katherine@mcd-law.com

**OREGON ENERGY COORDINATORS
ASSOCIATION**

KARL HANS TANNER
PRESIDENT
2448 W HARVARD BLVD
ROSEBURG OR 97470
karl.tanner@ucancap.org

**PORTLAND CITY OF - OFFICE OF CITY
ATTORNEY**

BENJAMIN WALTERS
DEPUTY CITY ATTORNEY
1221 SW 4TH AVE - RM 430
PORTLAND OR 97204
bwalters@ci.portland.or.us

PORTLAND CITY OF ENERGY OFFICE

DAVID TOOZE
SENIOR ENERGY SPECIALIST
721 NW 9TH AVE -- SUITE 350
PORTLAND OR 97209-3447
dtooze@ci.portland.or.us

PORTLAND GENERAL ELECTRIC

DOUGLAS C TINGEY
121 SW SALMON 1WTC13
PORTLAND OR 97204
doug.tingey@pgn.com