



CITY OF
PORTLAND, OREGON
OFFICE OF CITY ATTORNEY

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Fax No.: (503) 823-3089

September 23, 2010

BY EMAIL AND FIRST CLASS MAIL

Public Utility Commission
Attention: Filing Center
550 Capitol Street NE #215
PO Box 2148
Salem, OR 97308

Re: Docket No. UE 215: PGE Request for a General Rate Revision

Dear Commission:

Enclosed for filing is the original and one copy of the City of Portland's Motion to Admit Prefiled Testimony and Exhibits, with supporting affidavits, in the above-referenced matter.

Copies have been served on parties to this proceeding as identified in the attached service list.

Very truly yours,

Benjamin Walters
Chief Deputy City Attorney

BW:lw
Enclosures
cc: Service List-UE 215



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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 215

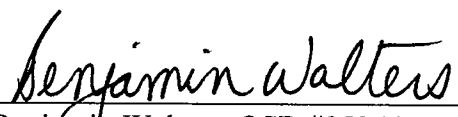
In the Matter of:)
PORTLAND GENERAL ELECTRIC)
COMPANY,)
Request for a General Rate Revision.)

MOTION TO ADMIT PREFILED
TESTIMONY AND EXHIBITS ON BEHALF
OF CITY OF PORTLAND, OREGON

The City of Portland, Oregon moves that the prefiled Opening Testimony and Exhibits of Richard Gray, Peter Koonce, Peter Nierengarten and Lon L. Peters (COP/100-107) be admitted into the record of this proceeding. The City of Portland further moves that the Rebuttal Testimony and Exhibits of Richard Gray, Peter Koonce, Peter Nierengarten and Lon L. Peters (COP/200-204A) also be admitted into the record of this proceeding. Affidavits from each of the testifying witnesses attesting to the truth and accuracy of their testimony and exhibits are attached. Original affidavits are being filed with this motion.

Dated this 23 day of September, 2010.

Respectfully submitted,


Benjamin Walters, OSB #85354
Chief Deputy City Attorney
Attorneys for City of Portland

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 215

In the Matter of:)
PORTLAND GENERAL ELECTRIC)
COMPANY,)
Request for a General Rate Revision.)

AFFIDAVIT OF PETER KOONCE

STATE OF OREGON)
COUNTY OF MULTNOMAH) ss.:


I, Peter Koonce, being first duly sworn, depose and say:

1. My full name is Peter Koonce. I am a Division Manager with the City of Portland's Bureau of Transportation.

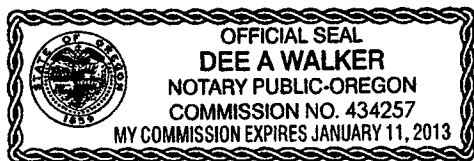
2. I was part of a panel that filed testimony and exhibits in this proceeding (COP/100-107 and COP/200-204A) on behalf of the City of Portland, Oregon.

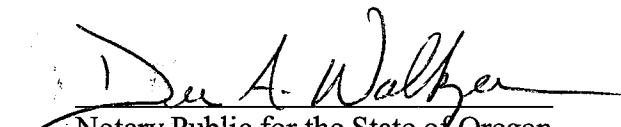
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would remain the same.

Dated this 23rd day of September, 2010.


Peter Koonce

Subscribed and sworn to or affirmed before me this 23rd day of September, 2010.




Notary Public for the State of Oregon
My Commission Expires:

1 BEFORE THE PUBLIC UTILITY COMMISSION

2 OF OREGON

3 UE 215

4 In the Matter of:)

5 PORTLAND GENERAL ELECTRIC)
6 COMPANY,)

7 Request for a General Rate Revision.)

AFFIDAVIT OF LON L. PETERS

8 STATE OF OREGON)

9 COUNTY OF MULTNOMAH)

) ss.:

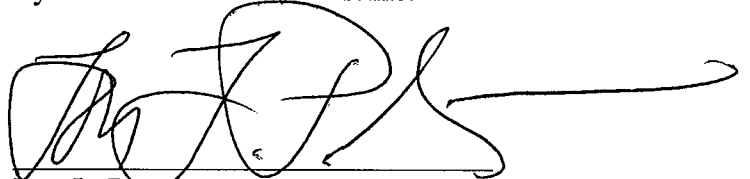
10 I, Lon L. Peters, being first duly sworn, depose and say that:

11 1. My full name is Lon L. Peters. I am the President of Northwest Economic
12 Research, Inc.

13 2. I was part of a panel that filed testimony and associated exhibits (COP/100-107
14 and COP/200-204A) on behalf of the City of Portland, Oregon in this matter.

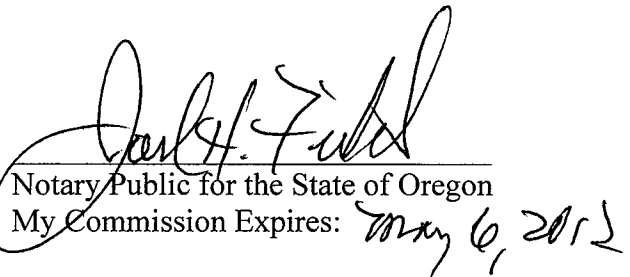
15 3. To the best of my knowledge, my pre-filed testimony and exhibits are true and
16 accurate. If I were asked the same questions today, my answers would be the same.

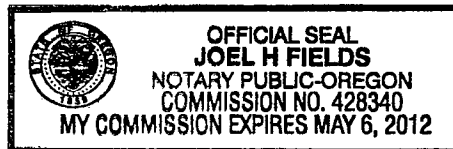
17 Dated this 22 day of September, 2010.



19 Lon L. Peters

20 Subscribed and sworn to or affirmed before me this 22nd day of September, 2010.

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24 Notary Public for the State of Oregon
25 My Commission Expires: May 6, 2012



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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 215

In the Matter of:)
PORTLAND GENERAL ELECTRIC)
COMPANY,)
Request for a General Rate Revision:)

AFFIDAVIT OF RICHARD EUGENE GRAY

STATE OF OREGON)
COUNTY OF MULTNOMAH) ss.:

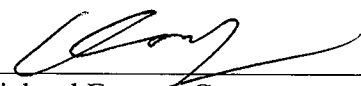
I, Richard Eugene Gray, being first duly sworn, depose and say:

1. My full name is Richard Eugene Gray. I am a contract Administrator and Senior Management Analyst with the City of Portland's Bureau of Transportation.

2. I was part of a panel that filed testimony and exhibits in this proceeding (COP/100-107 and COP/200-204A) on behalf of the City of Portland, Oregon.

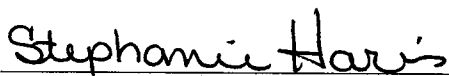
3. To the best of my knowledge, my pre-filed testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would remain the same.

Dated this 23rd day of September, 2010.


Richard Eugene Gray

Subscribed and sworn to or affirmed before me this 23rd day of September, 2010.




Notary Public for the State of Oregon
My Commission Expires:

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4 BEFORE THE PUBLIC UTILITY COMMISSION
5 OF OREGON
6 UE 215

7 In the Matter of:)
8 PORTLAND GENERAL ELECTRIC)
9 COMPANY,)
10 Request for a General Rate Revision.)

AFFIDAVIT OF PETER NIERENGARTEN

11 STATE OF OREGON)
12 COUNTY OF MULTNOMAH) ss.:

13 I, Peter Nierengarten, being first duly sworn, depose and say:

14 1. My full name is Peter Nierengarten. I am an engineer with the Portland Water
15 Bureau.

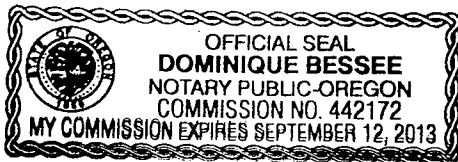
16 2. I was part of a panel that filed testimony and exhibits (COP/100-107 and
17 COP/200-204A) on behalf of the City of Portland, Oregon.


18 3. To the best of my knowledge, my pre-filed testimony and exhibits are true and
19 accurate. If I were asked the same questions today, my answers would be the same.

20 Dated this 23rd day of September, 2010.

21 
22 Peter Nierengarten

23 Subscribed and sworn to or affirmed before me this 23rd day of September, 2010.




Notary Public for the State of Oregon

My Commission Expires: September 12, 2013

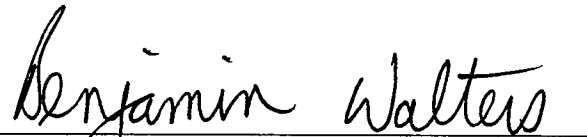
CERTIFICATE OF SERVICE

I hereby certify that I sent a copy of the foregoing MOTION TO ADMIT PREFILED TESTIMONY AND EXHIBITS ON BEHALF OF CITY OF PORTLAND, OREGON on:

PUBLIC UTILITY COMMISSION
ATTN: FILING CENTER
550 CAPITOL STREET NE, SUITE 215
PO BOX 2148
SALEM OREGON 9708-2148
E-mail: PUC.FilingCenter@state.or.us

on the ____ day of September, 2010, via e-mail as shown above and by mailing the original of said document, contained in a sealed envelope with postage paid, and deposited in the post office at Portland, Oregon on said day.

I further certify that the foregoing document was electronically mailed to all persons on the Service List maintained by the Public Utility Commission for the UE 215 proceeding who have an e-mail address posted. I further certify that for those persons on the Service List who were not identified as having an e-mail address, a copy was sent by first class mail, contained in a sealed envelope, with postage paid, and deposited in the post office at Portland, Oregon on said day.



Benjamin Walters, OSB #85354
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Of Attorneys for City of Portland

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