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Portland, OR 97204

October 5, 2010

*Via Electronic and U.S. 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 PORTLAND GENERAL ELECTRIC COMPANY  
Request for a General Rate Revision  
**Docket No. UE 215**

Dear Filing Center:

Enclosed for filing please find an original and one copy of a Motion to Admit Pre-filed Testimony (with Affidavits) on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket, with the certificate of proof of service attached.

Please feel free to call our office at (503) 241-7242 if you have any questions.  
Thank you for your assistance.

Sincerely yours,

/s/ Sarah A. Kohler  
Sarah A. Kohler

Enclosures  
cc: Service List

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Motion to Admit Pre-filed Testimony (with Affidavits) on behalf of the Industrial Customers of Northwest Utilities in Docket No. UE 215 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 where paper service has been waived.

Dated at Portland, Oregon, this 5th day of October, 2010.

/s/ Sarah A. Kohler  
Sarah A. Kohler

**PUBLIC UTILITY COMMISSION OF OREGON**

JUDY JOHNSON (C)  
PO BOX 2148  
SALEM OR 97308-2148  
judy.johnson@state.or.us

**DEPARTMENT OF JUSTICE**

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 215**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC CO. ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES MOTION TO  
 ) ADMIT PREFILED TESTIMONY (WITH  
Request for a General Rate Revision ) AFFIDAVITS)  
 )  
 )  
 )  
\_\_\_\_\_ )

Pursuant to the Administrative Law Judge’s Ruling, dated October 1, 2010, the Industrial Customers of Northwest Utilities (“ICNU”) hereby moves that the following pre-filed testimony and exhibits submitted on behalf of ICNU be admitted to the record. The testimony of Ellen Blumenthal and Michael P. Gorman were jointly sponsored by ICNU and the Citizens’ Utility Board.

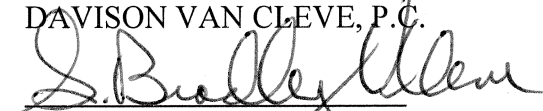
<b>Testimony</b>	<b>Witness(es)</b>
ICNU/100-106 (Re: Rate Case)	Randall J. Falkenberg
ICNU/100-103 (Re: AUT)	Randall J. Falkenberg
ICNU/200-207	Alan Rosenberg
ICNU-CUB/100-105	Ellen Blumenthal
ICNU-CUB/200-207	Michael P. Gorman
Stipulating Parties/300-301/Compton-Jenks-Rosenberg-Higgins-Cody	Alan Rosenberg

The original affidavits of Randall J. Falkenberg, Michael P. Gorman and Ellen Blumenthal attesting to the truth and accuracy of the testimony and exhibits are attached. Alan Rosenberg currently is out of the country and is expected to return on October 19, 2010. ICNU will file Dr. Rosenberg's affidavit following his return.

Dated this 5th day of October, 2010.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

A handwritten signature in black ink, appearing to read "S. Bradley Van Cleve", written over a horizontal line.

S. Bradley Van Cleve

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

bvc@dvclaw.com

Of Attorneys for Industrial Customers

of Northwest Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 215**

In the Matter of	)	
	)	AFFIDAVIT OF RANDALL J.
PORTLAND GENERAL ELECTRIC CO.	)	FALKENBERG
	)	
Request for a General Rate Revision	)	
_____	)	

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

1. My name is Randall J. Falkenberg. I am a utility rate and planning consultant holding the position of President and Principal with the firm of RFI Consulting, Inc. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities (“ICNU”). My business address is: PMB 362, 8343 Roswell Road, Sandy Springs, Georgia 30350.

2. I sponsored pre-filed direct testimonies and exhibits on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 215. Specifically, Direct Testimony addressing the general rate case phase of the proceeding (ICNU/100), and exhibits (ICNU/101-106) were filed on June 4, 2010, and Direct Testimony addressing the Annual Update Tariff (“AUT”) (ICNU/100/Falkenberg), and exhibits (ICNU/101-103), were filed on June 21, 2010.

3. Both of my testimonies and exhibits that were previously filed are true and accurate, and no corrections need to be made. If I were asked the same questions today, my answers would be the same.

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

SIGNED THIS 27th day of September, 2010, at Sandy Springs, GA.

Randall J. Falkenberg

Randall J. Falkenberg

SUBSCRIBED AND SWORN to before me this 27 day of September, 2010.



[Signature]  
NOTARY PUBLIC FOR The UPS Store

My Commission Expires: May 13, 2012

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 215**

In the Matter of	)	
	)	AFFIDAVIT OF MICHAEL P.
PORTLAND GENERAL ELECTRIC CO.	)	GORMAN
	)	
Request for a General Rate Revision	)	
_____	)	

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

1. My name is Michael P. Gorman. I am employed by the firm of Brubaker & Associates, Inc. (“BAI”), regulatory and economic consultants with corporate headquarters in Chesterfield, Missouri. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities (“ICNU”) and the Citizens’ Utility Board of Oregon (“CUB”). My business address is: 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

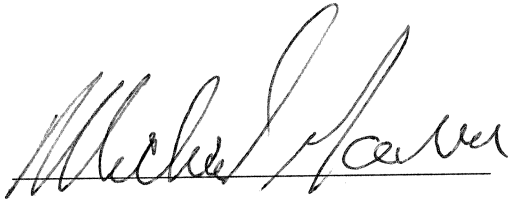
2. I sponsored pre-filed joint testimony and exhibits on behalf of ICNU and CUB in Oregon Public Utility Commission Docket No. UE 215. Specifically, Joint Testimony (ICNU-CUB/200) and exhibits, (ICNU-CUB/201-223/Gorman), were filed on June 4, 2010.

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



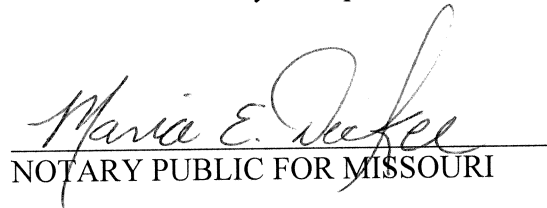
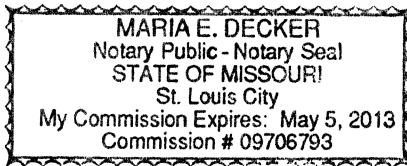
I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 27th day of September, 2010, at Chesterfield, Missouri.



Michael P. Gorman

SUBSCRIBED AND SWORN to before me this 27th day of September, 2010.



NOTARY PUBLIC FOR MISSOURI

My Commission Expires: May 5, 2013

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 215**

In the Matter of	)	
	)	AFFIDAVIT OF ELLEN
PORTLAND GENERAL ELECTRIC CO.	)	BLUMENTHAL
	)	
Request for a General Rate Revision	)	
_____	)	

I, Ellen Blumenthal, being first duly sworn on oath, depose and say:

1. My name is Ellen Blumenthal. I am a utility regulatory consultant and a Principal with GDS Associates, Inc. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities (“ICNU”) and the Citizens’ Utility Board of Oregon (“CUB”). My business address is: 13517 Queen Johanna Court, Corpus Christi, Texas 78418.

2. I sponsored pre-filed joint testimony and exhibits on behalf of ICNU and CUB in Oregon Public Utility Commission Docket No. UE 215. Specifically, Joint Testimony (ICNU-CUB/100) and exhibits, (ICNU-CUB/101-105/Blumenthal), were filed on June 4, 2010.

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

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

SIGNED THIS 4th day of October, 2010, at Corpus Christi, Texas.

Ellen Blumenthal

Ellen Blumenthal

SUBSCRIBED AND SWORN to before me this 4 day of October, 2010.



Rosa Martinez  
NOTARY PUBLIC FOR Rosa Martinez

My Commission Expires: 12/03/13