



**RICHARDSON & O'LEARY**

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September 12, 2011

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

Re: **Docket No. UE 227**  
**Noble Americas Energy Solutions, LLC's Motion to Admit Testimony and Exhibits**

Dear Filing Center:

Enclosed please find the Motion to Admit Testimony and Exhibits of Noble Americas Energy Solutions, LLC and the Affidavit of Kevin C. Higgins submitted for electronic filing in the above-reference docket. I have provided an original and one (1) copy.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Adams". The signature is fluid and cursive.

Gregory M. Adams  
Attorney for Noble Americas Energy Solutions, LLC

Enc.

Peter J. Richardson (OSB No. 06668)  
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Attorneys for the Noble Americas Energy Solutions, LLC

BEFORE THE  
 PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP, dba PACIFIC POWER 2012 Transition Adjustment Mechanism <hr style="width: 100%;"/>	) ) ) ) )	UE 227  NOBLE AMERICAS ENERGY SOLUTIONS LLC’S MOTION TO ADMIT TESTIMONY AND EXHIBITS
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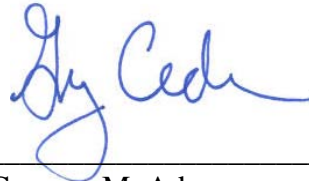
Noble Americas Energy Solutions, LLC (“Noble Solutions”) hereby respectfully moves for admission of the following pre-filed testimony and exhibits into the record in this matter. The original Affidavit of Kevin C. Higgins is attached in support of the truth and veracity of the following testimony and exhibits.

Exhibit/Date Filed	Witness
Noble Solutions 100/ June 24, 2011	Kevin C. Higgins
Noble Solutions 101/ June 24, 2011	Kevin C. Higgins
Noble Solutions 102/ June 24, 2011	Kevin C. Higgins
Noble Solutions 103/ June 24, 2011	Kevin C. Higgins

Noble Solutions 104/ June 24, 2011	Kevin C. Higgins
Noble Solutions 105/ June 24, 2011	Kevin C. Higgins
Noble Solutions 106/ June 24, 2011	Kevin C. Higgins
Noble Solutions 200/ August 16, 2011	Kevin C. Higgins
Noble Solutions 201/ August 16, 2011	Kevin C. Higgins
Noble Solutions 202/ August 16, 2011	Kevin C. Higgins

RESPECTFULLY SUBMITTED this 12<sup>th</sup> day of September 2011.

RICHARDSON & O'LEARY, PLLC



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Gregory M. Adams  
OSB No. 101779  
Attorneys for Noble Americas  
Energy Solutions, LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 12<sup>th</sup> day of September, 2011, a true and correct copy of the within and foregoing MOTION TO ADMIT TESTIMONY AND EXHIBITS (with AFFIDAVIT) was served as follows:

G. Catriona McCracken  
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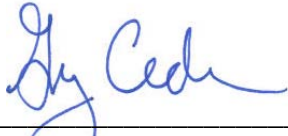
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Signed   
Gregory M. Adams

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Attorneys for the Noble Americas Energy Solutions, LLC

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP, dba PACIFIC ) UE 227  
POWER 2012 Transition Adjustment )  
Mechanism )  
) AFFIDAVIT OF KEVIN C. HIGGINS  
) REGARDING TESTIMONY AND  
) EXHIBITS

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STATE OF UTAH )  
) ss.  
County of Salt Lake )

I, Kevin C. Higgins, being first duly sworn on oath, depose and say:

1. My name is Kevin C. Higgins. I am a Principal in the firm of Energy Strategies, LLC, and was retained as a consultant by Nobel Americas Energy Solutions LLC in this case.

2. I am the same Kevin C. Higgins that previously filed reply and rebuttal testimony on behalf of Nobel Americas Energy Solutions LLC in this matter.


3. My pre-filed testimony and exhibits are true and accurate based on my information and belief. If I were answer those questions today, my responses would be the same.

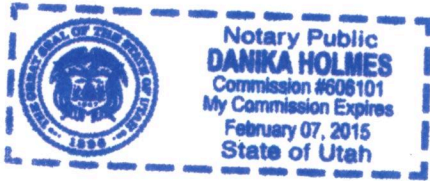
I declare under penalty of perjury under the laws of the state of Utah that the foregoing is true and correct based on my information and belief.

I signed this the 1<sup>st</sup> day of September, 2011.

  
Kevin C. Higgins

SUBSCRIBED AND SWORN to before me this 1<sup>st</sup> day of September 2011.

  
Danika Holmes



Notary Public for the State of Utah

Residing at 1983 Sun Peak Drive, Park City, UT

My Commission expires 2.7.2015