

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 228

In the Matter of)	
)	THE CITIZENS' UTILITY BOARD
PORTLAND GENERAL ELECTRIC)	OF OREGON'S MOTION TO
COMPANY)	ADMIT PREFILED TESTIMONY
)	
2012 Annual Power Cost Update Tariff)	
(Schedule 125))	
_____)	

The Citizens' Utility Board of Oregon (CUB) respectfully requests that the Administrative Law Judge admit the Opening Testimony of the Citizens' Utility Board of Oregon, with the two revisions noted during the hearing – the revision of Page 5 Line 20 and Page 7 Line 13 to read 48 months instead of 36 months – into the record in the above captioned proceeding. While CUB's testimony in this matter was accurate at all times CUB has during the course of the proceeding revised its recommendations as to the issue of when gas hedging becomes imprudent. CUB's revised position recommends that hedging taking place post 48 months, and not post 36 months in this docket, is imprudent. This is the basis of CUB's request to admit its testimony with the noted revisions.

CUB noted its revised position at the hearing and pointed out the two revisions that should be noted in its Opening Testimony filing. CUB then requested to be able to file a Motion to Admit its testimony with those revisions. No party to the proceeding objected to CUB's request and CUB was advised by the ALJ to go ahead and file a motion to admit the testimony with the noted revisions. Thus, CUB's Opening Testimony (CUB/100-104 Jenks - Feighner),

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PREFILED TESTIMONY

which was previously filed with the Commission on June 30, 2011, is now submitted, with the noted position change and change to its recommendations, for acceptance into the record in this proceeding as CUB's Testimony in this matter. Affidavits attesting to the truthfulness of the Testimony and CUB's change in position are attached to this motion.

DATED this 6th day of September, 2011.

Respectfully submitted,



John C. Sturm, OSB #105174
Staff Attorney
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610 SW Broadway Ste 400
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john@oregoncub.org

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 228

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	AFFIDAVIT OF GORDON
COMPANY)	FEIGHNER
)	
2012 Annual Power Cost Update Tariff)	
(Schedule 125))	
_____)	

I, Gordon Feighner, being duly sworn on oath, depose and say:

1. My name is Gordon Feighner. I am the Utility Analyst of the Citizens' Utility Board of Oregon (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205.

2. I sponsored pre-filed Opening Testimony and Exhibits (CUB/100-104 Jenks - Feighner).

3. My Testimony and Exhibit that were previously filed were true and accurate. However, as a result of the testimony of others in this proceeding, and as a result of additional research by CUB, CUB has determined that it would be more reasonable for CUB to recommend to the Commission that only hedging that exceeds a 48 month window be disallowed in this proceeding. With the revision of CUB's recommendation to the Commission that only hedging in excess of 48 months be found to be imprudent in this docket, my testimony would be the same today as that reflected in my pre-filed testimony.

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I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF OREGON THAT THE FOREGOING IS TRUE AND CORRECT BASED ON MY INFORMATION AND BELIEF.

Signed this 6th day of September, 2011.

Gordon Feighner

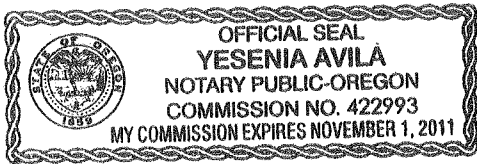
Gordon Feighner

Subscribed and sworn to before me this 6th day of September, 2011.

Signed: *Yesenia Avila*

Printed: Yesenia Avila

My Commission expires: Nov 1, 2011



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 228

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC COMPANY)	AFFIDAVIT OF BOB JENKS
)	
2012 Annual Power Cost Update Tariff (Schedule 125))	
)	
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I, Bob Jenks, being duly sworn on oath, depose and say:

1. My name is Bob Jenks. I am the Executive Director of the Citizens' Utility Board of Oregon (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205.
2. I sponsored pre-filed Opening Testimony and Exhibits (CUB/100-104 Jenks - Feighner).
3. My Testimony and Exhibit that were previously filed were true and accurate. However, as a result of the testimony of others in this proceeding, and as a result of additional research by CUB, CUB has determined that it would be more reasonable for CUB to recommend to the Commission that only hedging that exceeds a 48 month window be disallowed in this proceeding. With the revision of CUB's recommendation to the Commission that only hedging in excess of 48 months be found to be imprudent in this docket, my testimony would be the same today as that reflected in my pre-filed testimony.

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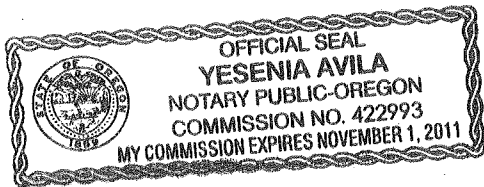
I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF OREGON THAT THE FOREGOING IS TRUE AND CORRECT BASED ON MY INFORMATION AND BELIEF.

Signed this 6th day of September, 2011.

Bob Jenks

Bob Jenks

Subscribed and sworn to before me this 6th day of September, 2011.



Signed: *Yesenia Avila*

Printed: Yesenia Avila

My Commission expires: Nov 1, 2011

UE 228 – CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of September, 2011, I served the foregoing **MOTION TO ADMIT PREFILED TESTIMONY** in docket UE 228 upon each party listed in the UE 228 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "John C. Sturm".

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