

August 17, 2012

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

Re: UE 245—Noble Americas Energy Solutions LLC's Motion to Admit Testimony and Exhibits

Enclosed please find Noble Americas Energy Solutions LLC's Motion to Admit Testimony and Exhibits filed in the above-reference docket electronically today. Included are the original and five (5) copiers.

Sincerely,

Chynna C. Tipton

Richardson & O'Leary PLLC

Attorney for Noble Americas Energy Solutions, LLC

Enc.

BEFORE THE

PUBLIC UTILITY COMMISSION OF OREGON

| In the Matter of PACIFICORP, dba PACIFIC POWER 2012 Transition Adjustment |) | UE 245 |
|---|----------|---|
| Mechanism |)) | NOBLE AMERICAS ENERGY SOLUTIONS LLC'S MOTION TO |
| <u> </u> | <u>´</u> | ADMIT TESTIMONY AND EXHIBITS |

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 6, 2012 | Kevin C. Higgins |
| Noble Solutions 101/ June 6, 2012 | Kevin C. Higgins |
| Noble Solutions 102/ June 6, 2012 | Kevin C. Higgins |
| Noble Solutions 103/ June 6, 2012 | Kevin C. Higgins |
| Noble Solutions 104/ June 6, 2012 | Kevin C. Higgins |
| Noble Solutions 105/ June 6, 2012 | Kevin C. Higgins |

RESPECTFULLY SUBMITTED this 17th day of August 2011.

RICHARDSON & O'LEARY, PLLC

Gregory M. Adams (OSB No. 101779)

Richardson & O'Leary PLLC 515 N. 27th Street

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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 |) UE 245) AFFIDAVIT OF KEVIN C. HIGGINS) REGARDING TESTIMONY AND) EXHIBITS |
|---|--|
| STATE OF | |

- 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 Nobel Americas Energy Solutions LLC testimony and exhibits numbers 100, 101, 102, 103, 104, and 105 in this matter on June 6, 2012.
- 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 signed this the day of | August 2012. |
|--|---|
| | Kevin C. Higgins |
| SUBSRIBED AND SWORN to be | fore me this 16th day of August 2012. MZ |
| | Minde M. Collner Notary Public for the State of Oregon |
| OFFICIAL SEAL MINDI M ZOLLNER NOTARY PUBLIC-OREGON COMMISSION NO. 438368 | Residing at Salem, OR My Commission expires 5 9 3 |
| MY COMMISSION EXPIRES MAY 9, 2013 | wiy Commission expires |

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of August, 2012, a true and correct copy of the within and foregoing MOTION TO ADMIT PRE-FILED TESTIMONY OF NOBLE AMERICAS ENERGY SOLUTIONS LLC, was served as shown to:

| ROBERT JENKS C CATRIONA MCCRACKEN OPUC DOCKETS Citizens' Utility Board of Oregon 610 SW Broadway Ste 400 Portland OR 97205 bob@oregoncub.org catriona@oregoncub.org dockets@oregoncub.org | Hand DeliveryU.S. Mail, postage pre-paid FacsimileX_ Electronic Mail |
|---|--|
| IRION A SANGER MELINDA J DAVISON Davison Van Cleve 333 SW Taylor Ste 400 Portland OR 97204 mail@dvclaw.com | Hand DeliveryU.S. Mail, postage pre-paid FacsimileX_ Electronic Mail |
| KATHERINE A MCDOWELL McDowell Rackner & Gibson PC 419 SW 11 th Ave Ste 400 Portland OR 97205 katherine@mcd-law.com | Hand Delivery U.S. Mail, postage pre-paid Facsimile X Electronic Mail |
| SARAH WALLACE Pacific Power 825 NE Multnomah St Ste 1800 Portland OR 97232 sarah.wallace@pacificorp.com | Hand DeliveryU.S. Mail, postage pre-paid FacsimileX_ Electronic Mail |
| OREGON DOCKETS PacifiCorp, dba Pacific Power 825 NE Multnomah St Ste 2000 Portland OR 97232 oregondockets@pacificorp.com | Hand DeliveryU.S. Mail, postage pre-paid FacsimileX_ Electronic Mail |
| DONALD W SCHOENBECK Regulatory & Cogeneration Services Inc 900 Washington St Ste 780 Vancouver WA 98660-3455 dws@r-c-s-inc.com | Hand Delivery U.S. Mail, postage pre-paid Facsimile X Electronic Mail |

| STEVE SCHUE Public Utility Commission of Oregon PO Box 2148 Salem OR 97308-2148 steve.schue@state.or.us | Hand Delivery U.S. Mail, postage pre-paid Facsimile Electronic Mail |
|--|--|
| JASON W JONES PUC Staff-Department of Justice Business Activities Section 1162 Court St NE Salem OR 97301-4096 iason.w.jones@state.or.us | — Hand Delivery U.S. Mail, postage pre-paidFacsimile _X_Electronic Mail |

Signed Gregory Adams