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**Via Electronic Mail [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)**  
**And Overnight Mail**

June 20, 2012

Public Utility Commission of Oregon  
550 Capitol Street NE, Suite 215  
Salem, Oregon 97310  
Attn: Filing Center

**Re: Case No. UE-246**

Dear Sir or Madam:

Please find enclosed the original and five (5) copies each of: 1) DIRECT TESTIMONY AND EXHIBITS OF NEAL TOWNSEND on behalf of THE FRED MEYERS STORES AND QUALITY FOOD CENTERS, DIVISIONS OF THE KROGER CO.; and 2) MOTION TO ADMIT PRE-FILED DIRECT TESTIMONY AND EXHIBITS OF NEAL TOWNSEND for filing in the above referenced matter.

Copies have been served on all parties of record. Please place this document of file.

Very truly yours,



Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.


**BOEHM, KURTZ & LOWRY**

KJBkew  
Enclosure

cc: Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via electronic mail this 20<sup>th</sup> day of June, 2012.

  
Kurt J. Boehm, Esq.  
Jody M. Kyler, Esq.

**W=Waive Paper  
service**

**C=Confidential  
HC=Highly Confidential**

Sort by Last Name

Sort by Company Name

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 246**

In The Matter Of  
PACIFICORP, dba PACIFIC POWER  
  
Request for a General Rate Revision

**MOTION TO ADMIT  
PRE-FILED DIRECT TESTIMONY  
AND EXHIBITS OF NEAL  
TOWNSEND ON BEHALF OF  
THE KROGER CO**

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The Kroger Co. moves that the PRE-FILED DIRECT TESTIMONY AND EXHIBITS OF NEAL TOWNSEND be admitted into the record of this proceeding. The affidavit attesting to the truth and accuracy of the testimony and exhibits is attached.

DATED this 20<sup>th</sup> day of June, 2012.

Respectfully submitted,



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**COUNSEL FOR FRED MEYER STORES AND  
QUALITY FOOD CENTERS, DIVISIONS OF  
KROGER CO**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF THE STATE OF OREGON**

**In the Matter of PacifiCorp's Filing of  
Revised Tariff Schedules for Electric  
Service in Oregon**

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**Docket No. UE-246**

**AFFIDAVIT OF NEAL TOWNSEND**

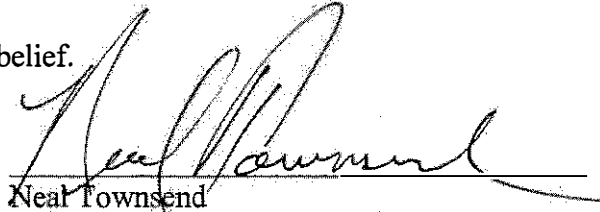
STATE OF UTAH

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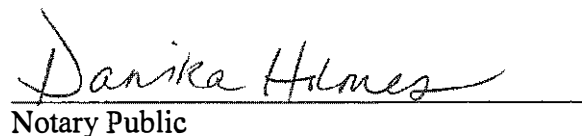
COUNTY OF SALT LAKE

Neal Townsend, being first duly sworn, deposes and states that:

1. He is a Director with Energy Strategies, L.L.C., in Salt Lake City, Utah;
2. He is the witness who sponsors the testimony entitled "Direct Testimony of Neal Townsend";
3. Said testimony was prepared by him and under his direction and supervision;
4. If inquiries were made as to the facts and schedules in said testimony he would respond as therein set forth; and
5. The aforesaid testimony and schedules are true and correct to the best of his knowledge, information and belief.

  
Neal Townsend

Subscribed and sworn to or affirmed before me this 15<sup>th</sup> day of June, 2012, by Neal  
Townsend.

  
Notary Public

