

Davison Van Cleve PC

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Suite 400
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Portland, OR 97204

September 27, 2013

Via Electronic Mail and Federal Express

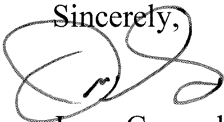
Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY
2013 Request for a General Rate Revision
Docket No. UE 262

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Motion to Admit the Testimony of the Industrial Customers of Northwest Utilities.

Thank you for your assistance, and please do not hesitate to call our office with any questions.

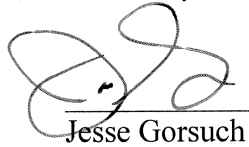
Sincerely,

Jesse Gorsuch

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the MOTION TO ADMIT THE TESTIMONY OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES upon all parties in this proceeding by causing a copy thereof to be sent via electronic mail to each party's last-known email address, as shown below.

Dated at Portland, Oregon, this 27th day of September, 2013.


Jesse Gorsuch

(W) PACIFIC POWER R. BRYCE DALLEY SARAH WALLACE 825 NE MULTNOMAH STE 1800 PORTLAND OR 97232 bryce.dalley@pacificorp.com sarah.wallace@pacificorp.com	(W) PACIFICORP, DBA PACIFIC POWER OREGON DOCKETS 825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com
(W) PUBLIC UTILITY COMMISSION OF OREGON JUDY JOHNSON PO BOX 2148 SALEM OR 97308-2148 judy.johnson@state.or.us	(W) PUC STAFF--DEPARTMENT OF JUSTICE JOHANNA RIEMENSCHNEIDER STEPHANIE S. ANDRUS 1162 COURT ST NE SALEM OR 97301-4096 johanna.riemenschneider@doj.state.or.us stephanie.andrus@state.or.us
(W) BOEHM KURTZ & LOWRY KURT J BOEHM JODY KYLER 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com jkyler@bkllawfirm.com	(W) CITIZENS' UTILITY BOARD OF OREGON OPUC DOCKETS ROBERT JENKS G. CATRIONA MCCrackEN 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org bob@oregoncub.org catriona@oregon.org

<p>(W) REGULATORY & COGENERATION SERVICES INC DONALD W SCHOENBECK 900 WASHINGTON ST STE 780 VANCOUVER WA 98660-3455 dws@r-c-s-inc.com</p>	<p>(W) ENERGY STRATEGIES LLC KEVIN HIGGINS 215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com</p>
<p>(W) BEERY, ELSNER & HAMMOND LLP NANCY L. WERNER 1750 SW HARBOR WAY, SUITE 380 PORTLAND OR 97201-5016 nancy@gov-law.com</p>	<p>FRED MEYER STORES/KROGER NONA SOLTERO 3800 SE 22ND AVE PORTLAND OR 97202 nona.soltero@fredmeyer.com</p>
<p>(W) CABLE HUSTON BENEDICT TOMMY A. BROOKS CHAD M. STOKES 1001 SW FIFTH AVE, STE 2000 PORTLAND OR 97204-1136 tbrooks@cablehuston.com cstokes@cablehuston.com</p>	<p>(W) CITY OF HILLSBORO ANDREW BARTLETT 150 EAST MAIN ST. HILLSBORO OR 97123 andrew.bartlett@hillsboro-oregon.gov</p>
<p>(W) CITY OF PORTLAND – CITY ATTORNEY’S OFFICE BENJAMIN WALTERS 1221 SW 4TH AVE – RM 430 PORTLAND OR 97204 ben.walters@portlandoregon.gov</p>	<p>(W) CITY OF PORTLAND – PLANNING & SUSTAINABILITY DAVID TOOZE 1900 SW 4TH STE 7100 PORTLAND OR 97201 david.tooze@portlandoregon.gov</p>

<p>(W) WAL-MART STORES, INC. STEVE W. CHRISS 2001 SE 10TH ST. BENTONVILLE, AR 72716-0550 stephen.chriss@wal-mart.com</p>	<p>(W) HUTCHINSON COX COONS ORR & SHERLOCK SAMUEL L. ROBERTS 777 HIGH ST., STE 200 P.O. BOX 10886 EUGENE OR 97440 sroberts@eugenelaw.com</p>
<p>(W) LEAGUE OF OREGON CITIES MAJA HAIUM TRACY RUTTEN PO BOX 928 SALEM OR 97308 mhaium@orcities.org trutten@orcities.org</p>	<p>(W) MCDOWELL RACKNER & GIBSON PC LISA F. RACKNER 419 SW 11TH AVE., SUITE 400 PORTLAND OR 97205 dockets@mcd-law.com</p>
<p>(W) NOBLE AMERICAS ENERGY SOLUTIONS, LLC GREG BASS 401 WEST A ST., STE. 500 SAN DIEGO CA 92101 gbass@noblesolutions.com</p>	<p>(W) NORTHWEST NATURAL E-FILING MARK R. THOMPSON 220 NW 2ND AVE PORTLAND OR 97209 efiling@nwnatural.com mark.thompson@nwnatural.com</p>
<p>(W) CARL FINK 628 SW CHESTNUT ST., STE 200 PORTLAND OR 97219 cmfink@blueplanetlaw.com</p>	<p>(W) PUBLIC UTILITY COMMISSION OF OREGON JOHN CRIDER PO BOX 2148 SALEM OR 97308-2148 john.crider@state.or.us</p>
<p>(W) PACIFIC POWER SARAH WALLACE SENIOR COUNSEL 825 NE MULTNOMAH STE 1800 PORTLAND OR 97232 sarah.wallace@pacificorp.com</p>	<p>(W) NW & INTERMOUNTAIN POWER PRODUCERS COALITION ROBERT D. KAHN 1117 MINOR AVENUE, SUITE 300 SEATTLE WA 98101 rkahn@nippc.org</p>

<p>(W) REGULATORY & COGENERATION SERVICES INC DONALD W SCHOENBECK 900 WASHINGTON ST STE 780 VANCOUVER WA 98660-3455 dws@r-c-s-inc.com</p>	<p>(W) ENERGY STRATEGIES LLC KEVIN HIGGINS 215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com</p>
<p>(W) SAFEWAY INC. LISSA MALDONADO GEORGE WAIDELICH 5918 STONERIDGE MALL ROAD PLEASANTON OR 94588-3229 lissa.maldonado@safeway.com george.waidelich@safeway.com</p>	<p>(W) NOBLE AMERICAS ENERGY SOLUTIONS, LLC GREG BASS 401 WEST A ST., STE. 500 SAN DIEGO CA 92101 gbass@noblesolutions.com</p>
<p>(W) PUC STAFF – DEPARTMENT OF JUSTICE MICHAEL WEIRICH BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us</p>	<p>(W) RICHARDSON ADAMS, PLLC GREGORY M. ADAMS PO BOX 7218 BOISE ID 83702 greg@richardsonadams.com</p>
<p>(W) PORTLAND GENERAL ELECTRI JAY TINKER – 1WTC-0702 DOUGLAS C. TINGEY - 1WTC13 121 SW SALMON PORTLAND OR 97204 pge.opuc.filings@pgn.com</p>	<p>(W) TROUTDALE ENERGY CENTER PAULA E. PYRON 4113 WOLF BERRY CT LAKE OSWEGO OR 97035-1827 ppyron@cpkinder.com</p>

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 262

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	MOTION TO ADMIT THE
COMPANY)	TESTIMONY OF THE INDUSTRIAL
)	CUSTOMERS OF NORTHWEST
2013 Request for a General Rate Revision)	UTILITIES
_____)	

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:

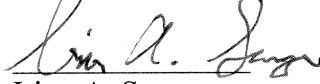
Testimony & Exhibits	Description
Confidential ICNU/100	Confidential Direct Testimony of Michael C. Deen
ICNU/101	Qualifications of Michael C. Deen
Confidential ICNU/102	PGE’s Response to Citizens’ Utility Board Data Request 003
ICNU/200	Rebuttal Testimony of Michael C. Deen
Stipulating Parties/300	Joint Testimony in Support of Third Partial Stipulation

The Affidavits of Michael Deen and Donald Schoenbeck attesting to the truth and accuracy of the testimony and exhibits are attached.

Dated this 27th day of September, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

A handwritten signature in black ink, appearing to read "Irion A. Sanger", written over a horizontal line.

Irion A. Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

ias@dvclaw.com

Of Attorneys for the Industrial Customers of Northwest
Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 262

In the Matter of)	
)	AFFIDAVIT OF MICHAEL C. DEEN
PORTLAND GENERAL ELECTRIC)	
COMPANY)	
)	
2013 Request for a General Rate Revision)	
_____)	

I, Michael C. Deen, being first duly sworn on oath, depose and say:

1. My name is Michael C. Deen. I will be employed by Regulatory and Cogeneration Services, Inc. ("RCS") until September 30, 2013. RCS is a utility rate and consulting firm. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU").

2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 262. Specifically, my Confidential Direct Testimony (Confidential ICNU/100), Witness Qualifications (ICNU/101) and PGE's Response to Citizens' Utility Board Data Request 003 (Confidential ICNU/102) were filed on June 14, 2013. My Rebuttal Testimony (ICNU/200) was filed on August 6, 2013.

3. Except for my employment status with RCS, 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 26th day of September, 2013, at Portland, Oregon.



Michael C. Deen

SUBSCRIBED AND SWORN to before me this 26th day of September, 2013.

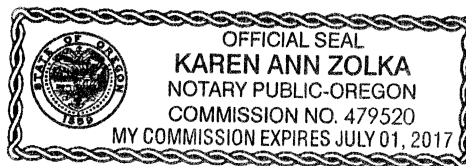
State of Oregon
County of Multnomah

This instrument was acknowledged before
me on September 26, 2013, by
Michael Deen.



NOTARY PUBLIC FOR OREGON

My Commission Expires: July 1, 2017



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 262

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	AFFIDAVIT OF DONALD W.
COMPANY)	SCHOENBECK
)	
2013 Request for a General Rate Revision)	
_____)	

I, Donald W. Schoenbeck, being first duly sworn on oath, depose and say:

1. My name is Donald W. Schoenbeck. I am employed by Regulatory and Cogeneration Services, Inc. ("RCS"). RCS is a utility rate and consulting firm. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU"). My business address is 900 Washington Street, Suite 780, Vancouver, Washington 98660.

2. I jointly sponsored pre-filed testimony on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 262. Specifically, the Stipulating Parties' Joint Testimony in Support of Third Partial Stipulation (Stipulating Parties/300) was filed on September 23, 2013.

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

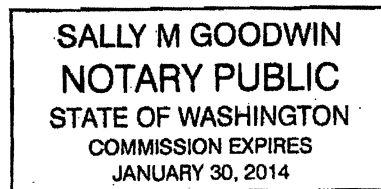
I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST
OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE
AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 26th day of September, 2013, at Vancouver, Washington.

Donald W. Schoenbeck

Donald W. Schoenbeck

SUBSCRIBED AND SWORN to before me this 26th day of September, 2013.



Sally M Goodwin
NOTARY PUBLIC FOR WASHINGTON
My Commission Expires: 1/30/2014