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August 23, 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 PACIFICORP 2014 Transition Adjustment Mechanism

Docket No. UE 264

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Motion to Admit Pre-filed Testimony and Exhibits 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 PRE-FILED TESTIMONY AND EXHIBITS 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 23<sup>rd</sup> day of August, 2013.

Jesse Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON

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#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### **UE 264**

In the Matter of	)	
	)	MOTION TO ADMIT PRE-FILED
PACIFICORP	)	TESTIMONY AND EXHIBITS ON
	)	BEHALF OF THE INDUSTRIAL
2014 Transition Adjustment Mechanism	)	CUSTOMERS OF NORTHWEST
		UTILITIES

Pursuant to Administrative Law Judge Shani Pines' Ruling, dated August 7, 2013, 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 Responsive Testimony of Michael C. Deen		
ICNU/101	Qualifications of Michael C.  Deen		
Confidential ICNU/102	Confidential Excerpts of PacifiCorp's Responses to ICNU Data Requests 2.1 and 2.3 (UE 263) and 1.12 and 2.1 (UE 264)		
Cross-Examination Exhibits	Description		
ICNU/200	PacifiCorp Response to ICNU Data Request No. 5.2		
Confidential ICNU/201	Excerpt of Confidential PacifiCorp Coal Inventory Policies & Procedures, Section VII, effective 9/30/2010		

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Confidential ICNU/202	Excerpt of Confidential
	PacifiCorp Coal Inventory
	Policies & Procedures, Section
	VII, effective 1/1/2013
Confidential ICNU/203	Excerpt of Confidential Pincock
	Report on Coal Inventory
	Policies, Section 4, dated
	1/28/2012
ICNU/204	Redacted Rebuttal Testimony of
	Cindy A. Crane in Case No.
	PAC-E-10-07
ICNU/205	Redacted Rebuttal Testimony of
	Cindy A. Crane in Docket No.
	20000-384-ER-10
Confidential ICNU/206	
	Confidential Rebuttal Testimony
	of Cindy A. Crane in Docket No.
	12-035-92

The affidavit of Michael Deen attesting to the truth and accuracy of his testimony and exhibits is attached.

Dated this 23rd day of August, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

Irion A. Sanger

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Of Attorneys for the Industrial Customer of Northwest Utilities

# BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 264			
In the Matter of	)	AFFIDAVIT OF MICHAEL C. DEEN	
PACIFICORP	)	ANTIBRATION MICHIELD C. BELLA	
2014 Transition Adjustment Mechanism	) ) )		

- I, Michael C. Deen, being first duly sworn on oath, depose and say:
- 1. My name is Michael C. Deen. 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, WA 98660.
- 2. I sponsored pre-filed testimony and exhibits on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 264. Specifically, my Responsive Testimony (ICNU/100) and exhibits (ICNU/101 and Confidential ICNU/102) were filed on June 4, 2013.
- 3. My testimony and exhibits 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 23rd day of August, 2013, at Portland, Oregon.

Michael C. Deen

SUBSCRIBED AND SWORN to before me this 23rd day of August, 2013.

State of Oragon.

County of Multalonah.

Michael Deen personally appeared before me on 8/23/13 and took an oath to the validity of the document above.

NOTARY PUBLIC FOR OREGON

My Commission Expires: July 1, 2017

