

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 267

In the Matter of PACIFICORP Five-Year Cost of Service Opt-Out _____))))))	MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS ON BEHALF OF THE STIPULATING PARTIES
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On behalf of Public Utility Commission of Oregon staff, the Industrial Customers of Northwest Utilities (“ICNU”), Noble Americas Energy Solutions LLC, Wal-Mart Stores, Inc., Shell Energy North America (US), LP, Constellation NewEnergy, Inc., Fred Meyer Stores, Inc./Kroger, Co., the Northwest and Intermountain Power Producers Coalition, Safeway Inc., and Vitesse, LLC (the “Stipulating Parties”) in this proceeding, ICNU hereby moves to admit the following pre-filed testimony and exhibits into the record:

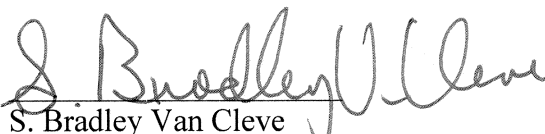
Testimony & Exhibits	Description
Stipulating Parties /100	Joint Testimony of the Stipulating Parties in Support of the Stipulation (including the errata to the Joint Testimony, filed on May 15, 2014)
Stipulating Parties/200	Stipulation
Stipulating Parties/300	PacifiCorp’s Responses to ICNU Data Request Nos. 3.1, 3.2, 3.5 (w/ attachment), 3.8, 3.10, and 3.12, and Staff Data Request 12
Stipulating Parties/301	2013 PUC Industry Restructuring Report

The Affidavits of Kevin C. Higgins, Steve W. Chriss, Mary Lynch, George R. Compton, and Bradley G. Mullins attesting to the truth and accuracy of their respective testimony and exhibits are attached.

Dated this 22nd day of May, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.




S. Bradley Van Cleve
333 S.W. Taylor, Suite 400
Portland, Oregon 97204
(503) 241-7242 telephone
(503) 241-8160 facsimile
bvc@dvclaw.com
Of Attorneys for the Industrial
Customer of Northwest Utilities on behalf
of the Stipulating Parties

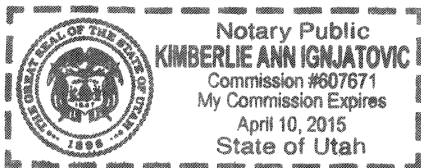
3. My pre-filed testimony and exhibits are true and accurate based on my information and belief. If I were answer those questions today, my responses would be the same.

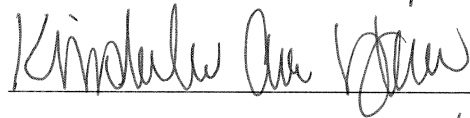
I declare under penalty of perjury under the laws of the state of Utah that the foregoing is true and correct based on my information and belief.

I signed this the 15th day of May 2014.


Kevin C. Higgins

SUBSCRIBED AND SWORN to before me this 15th day of May 2014.





Notary Public for the State of Utah

Residing at Salt Lake

My Commission expires April 10, 2015

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 267

In the Matter of PACIFICORP, dba)
PACIFIC POWER,)
2014 Transition Adjustment Mechanism,) AFFIDAVIT OF
Five-Year Cost of Service Opt-Out.) STEVE W. CHRISS
)
)
)
)

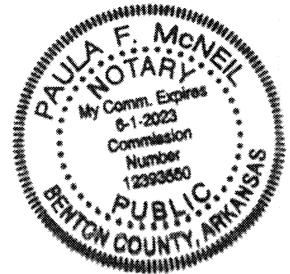
I, STEVE W. CHRISS, being first duly sworn on oath, depose and say:

1. My full name is Steve W. Chriss. I am Senior Manager, Energy Regulatory Analysis for Wal-Mart Stores, Inc. ("Walmart").
2. I filed testimony and associated exhibits (Stipulating Parties' Joint Testimony of Kevin C. Higgins, George R. Compton, Donald W. Schoenbeck, Steve W. Chriss, and Mary Lynch (Stipulating Parties/100, Higgins, Compton, Schoenbeck, Chriss, Lynch)) on behalf of the Stipulating Parties and Walmart in this matter.
3. To the best of my knowledge, my testimony and exhibits are true and accurate. If I were asked the same questions today, my answers would be the same.


SIGNED this 21st day of May, 2014.



STEVE W. CHRISS



SUBSCRIBED AND SWORN to before me this 21st day of May, 2013.



Notary Public for Arkansas
My Commission Expires 6-1-23

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 267

In The Matter Of
PACIFICORP dba PACIFIC POWER
Transition Adjustment, Five-Year Cost-of-
Service Opt-Out

AFFIDAVIT OF MARY LYNCH

I, MARY LYNCH, being first duly sworn on oath, depose and say:

1. My name is Mary Lynch. I am Vice President, Market Development, West Constellation NewEnergy, Inc. ("CNE"). CNE is a competitive retail energy provider.
2. I filed joint testimony in this matter on behalf of CNE and Shell Energy North America (US), L.P. ("SENA"). SENA is a wholesale and retail supplier of gas and electricity. CNE and SENA are both members of the group commonly referred to as the Stipulating Parties.
3. To the best of my knowledge, my testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 21st day of May, 2014

Mary Lynch
MARY LYNCH

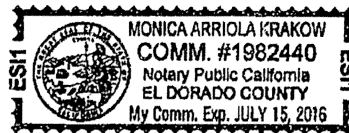
Subscribed and sworn to (or affirmed) before me on this 21st day of

May, 2014 by Mary Lynch

proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Monica Arriola Krakow
Signature

Seal



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 267

In the Matter of

PacifiCorp, dba Pacific Power


Transition Adjustment, Five-Year
Cost of Service Opt-Out

**AFFIDAVIT OF GEORGE R.
COMPTON**

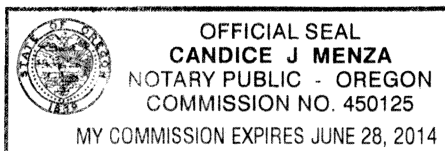
I, George R. Compton, hereby depose and say:

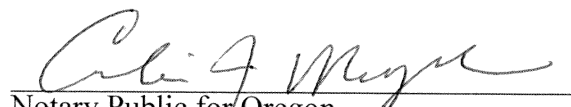
1. I am a Senior Economist employed by the Public Utility Commission of Oregon ("Commission").
2. I filed joint testimony in support of the Stipulation (Stipulating Parties' Joint Testimony/100) in this matter.
3. To the best of my knowledge, the joint testimony, including the errata filed on May 15, 2014 is true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 19 day of May 2014.


George R. Compton

SUBSCRIBED AND SWORN to before me this 19th day of May, 2014.




Notary Public for Oregon
My Commission Expires: 6-28-14

AFFIDAVIT OF GEORGE R. COMPTON

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 267

In the Matter of)	
)	AFFIDAVIT OF
PACIFICORP)	BRADLEY G. MULLINS
)	
Five-Year Cost of Service Opt-Out)	
_____)	

I, Bradley G. Mullins, being first duly sworn on oath, depose and say:

1. My name is Bradley G. Mullins. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities (“ICNU”). My business address is 333 SW Taylor, Suite 400, Portland, OR 97204.

2. I am adopting the pre-filed testimony and exhibits prepared by Donald W. Schoenbeck on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 267. Specifically, I am adopting Mr. Schoenbeck’s Reply Testimony (ICNU/100) and Exhibits (ICNU/101 and ICNU/102) that were filed on September 13, 2013, and a corrected version of Exhibit ICNU/103 that was filed on May 16, 2014.

3. Mr. Schoenbeck also was one of several witnesses who jointly sponsored the Joint Testimony of the Stipulating Parties in Support of the Stipulation (including the errata to the Joint Testimony, filed on May 15, 2014) (Stipulating Parties/100). I also am replacing Mr. Schoenbeck as ICNU’s witness sponsoring Stipulating Parties/100.

4. Mr. Schoenbeck’s above-referenced testimony and exhibits 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 as Mr. Schoenbeck’s answers. Attached hereto is a summary of my qualifications.

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 22nd day of May, 2014, at Portland, Oregon.

Bradley G. Mullins

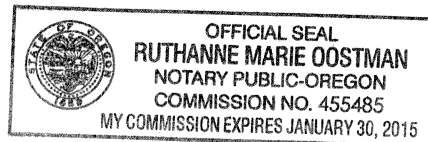
Bradley G. Mullins

SUBSCRIBED AND SWORN to before me this 22nd day of May, 2014.

By Bradley G. Mullins

Ruthanne Marie Oostman
NOTARY PUBLIC FOR OREGON

My Commission Expires: Jan 30, 2015



Summary of Qualifications of Bradley G. Mullins

Docket No. UE 267

Bradley G. Mullins is an independent consultant representing industrial customers throughout the western United States. His business address 333 SW Taylor, Suite 400, Portland, OR 97204.

Mr. Mullins received Bachelor of Science degrees in Finance and in Accounting from the University of Utah. He also received a Master of Science degree in Accounting from the University of Utah. After receiving his Master of Science degree, Mr. Mullins worked at Deloitte Tax, LLP, where he was a Tax Senior providing tax consulting services to multinational corporations and investment fund clients. Subsequently, Mr. Mullins worked at PacifiCorp Energy as an analyst involved in regulatory matters primarily involving power supply costs.

Mr. Mullins began performing independent consulting services in September 2013 and has been engaged by industrial organizations located throughout the western United States to participate in utility regulatory proceedings, including proceedings in Oregon, Washington and Wyoming. In Oregon, he is engaged to testify on behalf of ICNU before the Oregon Public Utility Commission in ongoing rate proceedings with Portland General Electric and PacifiCorp. In Washington, he is engaged to testify on behalf of ICNU before the Washington Utilities and Transportation Commission in the general rate proceeding of Avista. In Wyoming, he is engaged to provide non-testifying services related to various matters before the Wyoming Public Service Commission.

Davison Van Cleve PC

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com

Suite 400
333 SW Taylor
Portland, OR 97204

May 22, 2014

Via E-mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Dr SE
Salem, OR 97302-1166

Re: PacifiCorp 5-Year Cost of Service Opt-Out
Docket No. UE 267

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 on Behalf of the Stipulating Parties.

Thank you for your assistance. If you have any questions, please do not hesitate to contact our office.

Sincerely,



Jesse O. Gorsuch

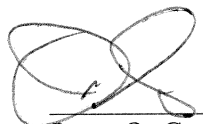
Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the attached **Motion to Admit Pre-Filed Testimony and Exhibits** upon all parties in this proceeding by causing a copy to be sent via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 22nd day of May, 2014.



Jesse O. Gorsuch

<p>(W) CARL FINK 628 SW CHESTNUT ST, STE 200 PORTLAND OR 97219 cmfink@blueplanetlaw.com</p>	<p>(W) EDWARD FINKLEA EXECUTIVE DIRECTOR 326 FIFTH ST LAKE OSWEGO OR 97034 efinklea@nwigu.org</p>
<p>(W) BOEHM KURTZ & LOWRY KURT J BOEHM JODY KYLER COHN 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com jkyler@bkllawfirm.com</p>	<p>(W) CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP THOMAS M GRIM RICHARD LORENZ 1001 SW FIFTH AVE STE 2000 PORTLAND OR 97204-1136 tgrim@cablehuston.com rlorenz@cablehuston.com</p>
<p>(W) CONSTELLATION ENERGY COMMODITIES GROUP, INC. MARY LYNCH 5074 NAWAL DRIVE EL DORADO HILLS CA 95762 mary.lynch@constellation.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) EXELON BUSINESS SERVICES COMPANY CYNTHIA FONNER BRADY 4300 WINFIELD RD WARRENVILLE IL 60555 cynthia.brady@constellation.com</p>	<p>(W) FRED MEYER STORES/KROGER NONA SOLTERO CORPORATE LAW DEPT. #23C 3800 SE 22ND AVE PORTLAND OR 97202 nona.soltero@fredmeyer.com</p>
<p>(W) HUTCHINSON COX COONS ORR & SHERLOCK SAMUEL L ROBERTS 777 HIGH ST STE 200 PO BOX 10886 EUGENE OR 97440 sroberts@eugenelaw.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) NW & INTERMOUNTAIN POWER PRODUCERS COALITION ROBERT D KAHN 1117 MINOR AVENUE, SUITE 300 SEATTLE WA 98101 rkahn@nippc.org</p>	<p>(W) PACIFIC POWER & LIGHT JOELLE STEWARD 825 NE MULTNOMAH STE 2000 PORTLAND OR 97232 joelle.steward@pacificcorp.com</p>
<p>(W) MCDOWELL RACKNER & GIBSON PC KATHERINE A. MCDOWELL 419 SW 11TH AVE., SUITE 400 PORTLAND OR 97205 katherine@mcd-law.com</p>	<p>(W) PORTLAND GENERAL ELECTRIC DOUGLAS C TINGEY – 1WTC13 JAY TINKER – 1WTC-0702 121 SW SALMON ST. PORTLAND OR 97204 doug.tingey@pgn.com pge.opuc.filings@pgn.com</p>

<p>(W) PUBLIC UTILITY COMMISSION OF OREGON MARC HELLMAN PO BOX 1088 SALEM OR 97308-1088 marc.hellman@state.or.us</p>	<p>(W) PUC STAFF - DEPARTMENT OF JUSTICE JOHANNA RIEMENSCHNEIDER BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4796 johanna.riemenschneider@doj.state.or.us</p>
<p>(W) CONSTELLATION NEWENERGY, INC. JOHN DOMAGALSKI 550 WEST WASHINGTON BLVD, STE 300 CHICAGO, IL 60661 john.domagalski@constellation.com</p>	<p>(W) RICHARDSON ADAMS, PLLC GREGORY M. ADAMS PO BOX 7218 BOISE ID 83702 greg@richardsonadams.com</p>
<p>(W) SAFEWAY INC LISSA MALDONADO GEORGE WAIDELICH 5918 STONERIDGE MALL ROAD PLEASANTON CA 94588-3229 lissa.maldonado@safeway.com george.waidelich@safeway.com</p>	<p>(W) SHELL ENERGY JOHN LESLIE 600 WEST BROADWAY SUITE 2600 SAN DIEGO CA 92101 jleslie@mckennalong.com</p>
<p>(W) SHELL ENERGY NORTH AMERICA MARCIE MILNER 4445 EASTGATE MALL STE 100 SAN DIEGO CA 92121 marcie.milner@shell.com</p>	<p>(W) WAL-MART STORES, INC. STEVE W CHRISS KEN BAKER 2001 SE 10TH ST BENTONVILLE AR 72716-0550 stephen.chriss@wal-mart.com ken.baker@wal-mart.com</p>

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oregondockets@pacificorp.com

**(W) MCKENNA LONG & ALDRIDGE
LLP**
STEFANIE WARREN
600 W BROADWAY STE 2600
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swarren@mckennalong.com