

# 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 of the Industrial Customers of Northwest Utilities.

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

Sincerely,



Jesse O. Gorsuch

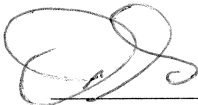
Enclosures

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><b>(W) CARL FINK</b> 628 SW CHESTNUT ST, STE 200 PORTLAND OR 97219 cmfink@blueplanetlaw.com</p>	<p><b>(W) EDWARD FINKLEA</b> EXECUTIVE DIRECTOR 326 FIFTH ST LAKE OSWEGO OR 97034 efinklea@nwigu.org</p>
<p><b>(W) BOEHM KURTZ &amp; LOWRY</b> KURT J BOEHM JODY KYLER COHN 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com jkyler@bkllawfirm.com</p>	<p><b>(W) CABLE HUSTON BENEDICT HAAGENSEN &amp; LLOYD LLP</b> THOMAS M GRIM RICHARD LORENZ 1001 SW FIFTH AVE STE 2000 PORTLAND OR 97204-1136 tgrim@cablehuston.com rlorenz@cablehuston.com</p>
<p><b>(W) CONSTELLATION ENERGY COMMODITIES GROUP, INC.</b> MARY LYNCH 5074 NAWAL DRIVE EL DORADO HILLS CA 95762 mary.lynch@constellation.com</p>	<p><b>(W) ENERGY STRATEGIES LLC</b> KEVIN HIGGINS 215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com</p>

<p><b>(W) EXELON BUSINESS SERVICES COMPANY</b>  CYNTHIA FONNER BRADY  4300 WINFIELD RD  WARRENVILLE IL 60555  cynthia.brady@constellation.com</p>	<p><b>(W) FRED MEYER STORES/KROGER</b>  NONA SOLTERO  CORPORATE LAW DEPT. #23C  3800 SE 22ND AVE  PORTLAND OR 97202  nona.soltero@fredmeyer.com</p>
<p><b>(W) HUTCHINSON COX COONS ORR &amp; SHERLOCK</b>  SAMUEL L ROBERTS  777 HIGH ST STE 200  PO BOX 10886  EUGENE OR 97440  sroberts@eugenelaw.com</p>	<p><b>(W) NOBLE AMERICAS ENERGY SOLUTIONS, LLC</b>  GREG BASS  401 WEST A ST., STE. 500  SAN DIEGO CA 92101  gbass@noblesolutions.com</p>
<p><b>(W) NW &amp; INTERMOUNTAIN POWER PRODUCERS COALITION</b>  ROBERT D KAHN  1117 MINOR AVENUE, SUITE 300  SEATTLE WA 98101  rkahn@nippc.org</p>	<p><b>(W) PACIFIC POWER &amp; LIGHT</b>  JOELLE STEWARD  825 NE MULTNOMAH STE 2000  PORTLAND OR 97232  joelle.steward@pacificcorp.com</p>
<p><b>(W) MCDOWELL RACKNER &amp; GIBSON PC</b>  KATHERINE A. MCDOWELL  419 SW 11<sup>TH</sup> AVE., SUITE 400  PORTLAND OR 97205  katherine@mcd-law.com</p>	<p><b>(W) PORTLAND GENERAL ELECTRIC</b>  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><b>(W) PUBLIC UTILITY COMMISSION OF OREGON</b>  MARC HELLMAN  PO BOX 1088  SALEM OR 97308-1088  marc.hellman@state.or.us</p>	<p><b>(W) PUC STAFF - DEPARTMENT OF JUSTICE</b>  JOHANNA RIEMENSCHNEIDER  BUSINESS ACTIVITIES SECTION  1162 COURT ST NE  SALEM OR 97301-4796  johanna.riemenschneider@doj.state.or.us</p>
<p><b>(W) CONSTELLATION NEWENERGY, INC.</b>  JOHN DOMAGALSKI  550 WEST WASHINGTON BLVD, STE 300  CHICAGO, IL 60661  john.domagalski@constellation.com</p>	<p><b>(W) RICHARDSON ADAMS, PLLC</b>  GREGORY M. ADAMS  PO BOX 7218  BOISE ID 83702  greg@richardsonadams.com</p>
<p><b>(W) SAFEWAY INC</b>  LISSA MALDONADO  GEORGE WAIDELICH  5918 STONERIDGE MALL ROAD  PLEASANTON CA 94588-3229  lissa.maldonado@safeway.com  george.waidelich@safeway.com</p>	<p><b>(W) SHELL ENERGY</b>  JOHN LESLIE  600 WEST BROADWAY SUITE 2600  SAN DIEGO CA 92101  jleslie@mckennalong.com</p>
<p><b>(W) SHELL ENERGY NORTH AMERICA</b>  MARCIE MILNER  4445 EASTGATE MALL STE 100  SAN DIEGO CA 92121  marcie.milner@shell.com</p>	<p><b>(W) WAL-MART STORES, INC.</b>  STEVE W CHRISS  KEN BAKER  2001 SE 10TH ST  BENTONVILLE AR 72716-0550  stephen.chriss@wal-mart.com  ken.baker@wal-mart.com</p>

**(W) PACIFICORP, DBA PACIFIC  
POWER**

OREGON DOCKETS  
825 NE MULTNOMAH ST., STE 2000  
PORTLAND OR 97232  
oregondockets@pacificorp.com

**(W) MCKENNA LONG & ALDRIDGE  
LLP**

STEFANIE WARREN  
600 W BROADWAY STE 2600  
SAN DIEGO CA 92101  
swarren@mckennalong.com

**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 INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
--	----------------------------	---

The Industrial Customers of Northwest Utilities (“ICNU”) hereby moves that the following pre-filed testimony and exhibits submitted on behalf of ICNU in the above-captioned proceeding be admitted into the record:

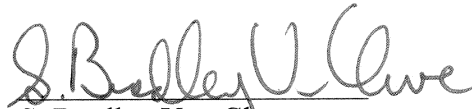
Testimony & Exhibits	Description
ICNU/100	Reply Testimony of Donald W. Schoenbeck
ICNU/101	Qualifications of Donald W. Schoenbeck
ICNU/102	PacifiCorp Responses to Noble American Energy Solutions’ Data Requests Nos. 1.2, 1.3 and 1.10; and PacifiCorp Response to OPUC Staff Data Request No. 2
ICNU/103	Second Partial Stipulation in Docket No. UE 262; and Joint Testimony in Support of Second Partial Stipulation in Docket No. UE 262 (including errata filed on May 16, 2014)

Bradley G. Mullins is adopting the testimony and exhibits sponsored by Mr. Schoenbeck. The Affidavit of Bradley G. Mullins attesting to the truth and accuracy of Mr. Schoenbeck's testimony and exhibits is 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

**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

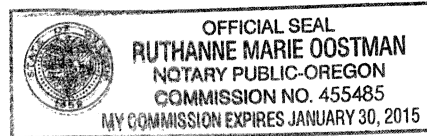
SUBSCRIBED AND SWORN to before me this 22nd day of May, 2014.

*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.