

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 283

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision.

MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS

Pursuant to OAR 860-001-0420, the Industrial Customers of Northwest Utilities (“ICNU”) moves for admission into the record of this proceeding the following pre-filed testimony and exhibits, submitted on behalf of ICNU:

Testimony & Exhibits	Description
Confidential ICNU/100	Confidential Opening Testimony of Bradley G. Mullins
ICNU/101	Qualifications of Bradley G. Mullins
ICNU/102	Revenue Requirement Impact of Michael P. Gorman’s Cost of Capital Recommendations
ICNU/103	Selection from Opening Testimony of Bradley G. Mullins in Docket No. UE 286
ICNU/104	Revenue Requirement Impact of Deferred Production Tax Credits
ICNU/105	Revenue Requirement Impact of Prepaid Pension Asset
ICNU/106	Revenue Requirement Impact of Environmental Remediation Costs
ICNU/107	PGE Statements Regarding Environmental Remediation Activities Along the Willamette River
ICNU/108	Excerpt of Downtown Reach Remedial Investigation Study

ICNU/109	Revenue Requirement Impact of MC Initiative Costs, and Company Response to OPUC Staff DR 358, Attachment B
ICNU/110	Estimated Revenue Requirement Impact of Updated Depreciation Expense
ICNU/200	Opening Testimony of Michael P. Gorman
ICNU/201	Qualifications of Michael P. Gorman
ICNU/202	Rate of Return
ICNU/203	Proxy Group
ICNU/204	Consensus Analysts' Growth Rates
ICNU/205	Constant Growth DCF Model
ICNU/206	Payout Ratios
ICNU/207	Sustainable Growth Rate
ICNU/208	Constant Growth DCF Model
ICNU/209	Electricity Sales Are Linked to U.S. Economic Growth
ICNU/210	Multi-Stage Growth DCF Model
ICNU/211	Common Stock Market/Book Ratio
ICNU/212	Equity Risk Premium – Treasury Bond
ICNU/213	Equity Risk Premium – Utility Bond
ICNU/214	Bond Yield Spreads
ICNU/215	Treasury and Utility Bond Yields
ICNU/216	Value Line Beta
ICNU/217	CAPM Return
ICNU/218	Standard & Poor's Credit Metrics
ICNU/219	Summary of the Revisions to Dr. Zepp's DCF Model
ICNU/220	Revision of Dr. Zepp's Table 13 Risk Premium Analysis
ICNU/221	Accuracy of Interest Rate Forecasts
ICNU/300	Rebuttal Testimony of Bradley G. Mullins

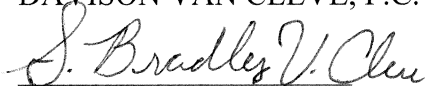
ICNU/301	Staff Responses to ICNU Data Requests
ICNU/302	CUB Responses to ICNU Data Requests
ICNU/303	Company Responses to ICNU Data Requests
ICNU/304	Energy Trust of Oregon, “Funding Limitations for Large Energy Users” (April 16, 2014)
ICNU/305	Pinnacle Economics, <u>Economic Impacts from Energy Trust of Oregon’s 2013 Program Activities</u> , Final Report (May 5, 2014)
ICNU/306	State & Local Energy Efficiency Action Network (2014). <u>Industrial Energy Efficiency: Designing Effective State Programs for the Industrial Sector</u> . Prepared by A. Goldberg, R.P. Taylor, and B. Hedman, Institute for Industrial Productivity (excerpt)
ICNU/307	Corrected Calculation of Production Tax Credits Carry-Forwards
ICNU/400	Rebuttal Testimony of Ali Al-Jabir
ICNU/401	Qualifications of Ali Al-Jabir
ICNU/402	Change in Cost Allocation Based on PGE and CUB Generation Energy Allocation Factors
ICNU/403	Impact of CUB’s Allocation Proposal
ICNU/404	PGE’s Response to ICNU Data Request No. 138 and CUB’s Response to ICNU Data Request No. 10a
ICNU/500	Rebuttal Testimony of Michael P. Gorman
ICNU/501	Internally Generated Funds
ICNU/502	Equity Risk Premium – Treasury Bond and Equity Risk Premium – Utility Bond

The Affidavits of Bradley G. Mullins, Michael P. Gorman, and Ali Al-Jabir
attesting to the truth and accuracy of the testimony and exhibits are attached.

Dated this 29th day of September, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



S. Bradley Van Cleve

Tyler C. Pepple

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Of Attorneys for the Industrial Customers of Northwest
Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 283

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision

AFFIDAVIT OF
BRADLEY G. MULLINS

I, BRADLEY G. MULLINS, being first duly sworn on oath, depose and say:

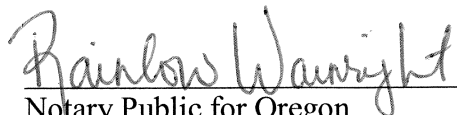
1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities (“ICNU”) in this matter.
2. I filed testimony and exhibits (ICNU/100 – ICNU/110 and ICNU/300 – ICNU/307) on behalf of ICNU in this matter.
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 26th day of September, 2014.



BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 26th day of September, 2014.



Notary Public for Oregon
County of Multnomah
My Commission Expires: 7/31/18



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 283

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision

AFFIDAVIT OF
MICHAEL P. GORMAN

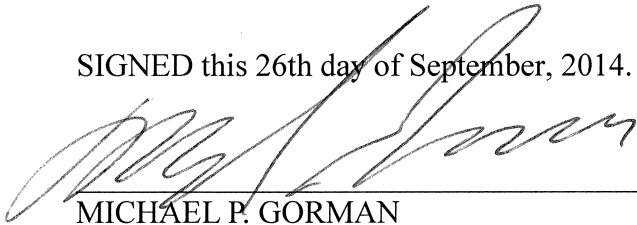
I, MICHAEL P. GORMAN, being first duly sworn on oath, depose and say:

1. My name is Michael P. Gorman. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities (“ICNU”) in this matter.

2. I filed testimony and exhibits (ICNU/200 – ICNU/221 and ICNU/500 – ICNU/502) on behalf of ICNU in this matter.

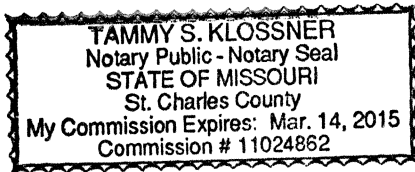
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

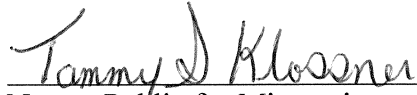
SIGNED this 26th day of September, 2014.



MICHAEL P. GORMAN

SUBSCRIBED AND SWORN to before me this 26th day of September, 2014.





Notary Public for Missouri
County of St. Louis
My Commission Expires: March 14, 2015

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 283

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision

AFFIDAVIT OF
ALI AL-JABIR

I, ALI AL-JABIR, being first duly sworn on oath, depose and say:

1. My name is Ali Al-Jabir. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities (“ICNU”) in this matter.
2. I filed testimony and exhibits (ICNU/400 – ICNU/404) on behalf of ICNU in this matter.
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

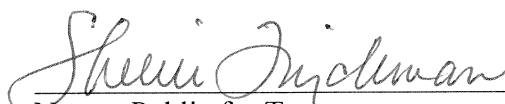
SIGNED this 26th day of September, 2014.



ALI AL-JABIR

SUBSCRIBED AND SWORN to before me this 26th day of September, 2014.





Notary Public for Texas
County of Nueces
My Commission Expires: 3/26/2018

Davison Van Cleve PC

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Suite 400
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September 29, 2014

Via Electronic Mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem OR 97302

Re: PORTLAND GENERAL ELECTRIC
Request for a General Rate Revision
Docket No. UE 283

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 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 in Portland, Oregon, this 29th day of September, 2014.

Sincerely,



Jesse O. Gorsuch

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