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Via Electronic Mail puc.filingcenter@state.or.us

September 24, 2015

Public Utility Commission of Oregon
201 High St SE
Salem OR 97301-3612
Attn: Filing Center

Re: Case No. UE-294

Dear Sir or Madam:

Please find attached the MOTION TO ADMIT PRE-FILED OPENING TESTIMONY AND EXHIBITS OF NEAL TOWNSEND ON BEHALF OF THE FRED MEYER STORES, INC., A WHOLLY OWNED SUBSIDIARY OF THE KROGER CO. AND QUALITY FOOD CENTERS, A DIVISION OF THE FRED MEYER STORES, INC. for filing in the above referenced matter.

Copies have been served on all parties of record.

Very truly yours,



Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

KJBkew
Enclosure

cc: Certificate of Service

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 294

In the Matter of)
)
PORTLAND GENERAL ELECTRIC COMPANY) **MOTION TO ADMIT**
) **PRE-FILED OPENING TESTIMONY AND**
Request for a General Rate Revision.) **EXHIBITS OF NEAL TOWNSEND ON**
) **BEHALF OF THE FRED MEYER STORES,**
) **INC.**

Fred Meyer Stores, Inc., a subsidiary of The Kroger Co. and Quality Food Centers, A Division of The Kroger Co. moves that the PRE-FILED OPENING TESTIMONY AND EXHIBITS OF NEAL TOWNSEND be admitted into the record of this proceeding. The affidavit attesting to the truth and accuracy of the testimony and exhibits is attached.

DATED this 24th day of September, 2015.

Respectfully submitted,



Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
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Nona M. Soltero, Esq. (OSB 82123)
Corporate Law Dept. #23C
Fred Meyer Stores, Inc. / Kroger Western Region
3800 SE 22nd Avenue
Portland, OR 97202
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**COUNSEL FOR FRED MEYER STORES, INC. A
SUBSIDIARY OF THE KROGER CO. AND
QUALITY FOOD CENTERS, A DIVISION OF
THE KROGER CO.**

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

UE 294

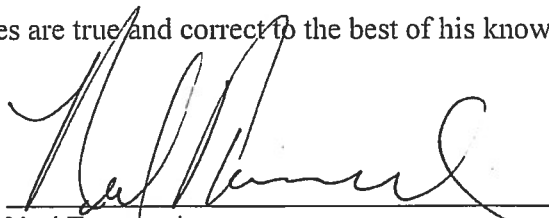
In the Matter of)
)
PORTLAND GENERAL ELECTRIC COMPANY)
)
Request for a General Rate Revision.)
_____)

AFFIDAVIT OF NEAL TOWNSEND

STATE OF UTAH)
)
COUNTY OF SALT LAKE)

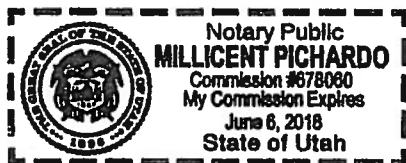
Neal Townsend, being first duly sworn, deposes and states that:

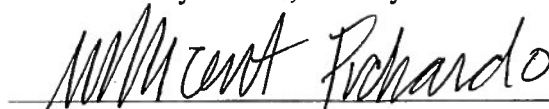
1. He is a Principal with Energy Strategies. L.L.C., in Salt Lake City, Utah;
2. He is the witness who sponsors the accompanying testimony entitled "Opening Testimony of Neal Townsend;"
3. Said testimony was prepared by him and under his direction and supervision;
4. If inquiries were made as to the facts and schedules in said testimony he would respond as therein set forth; and
5. The aforesaid testimony and schedules are true and correct to the best of his knowledge, information and belief.



Neal Townsend

Subscribed and sworn to or affirmed before me this 12th day of June, 2015 by Neal Townsend.

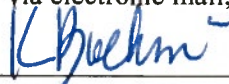




Notary Public

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via electronic mail, unless otherwise noted, this 24th day of September, 2015.


Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.

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