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Portland, OR 97204

September 9, 2015

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97301-3612

Re: PORTLAND GENERAL ELECTRIC
2015 General Rate Case
Docket No. UE 294

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find 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,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 294

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 Power Cost Testimony of Bradley G. Mullins
ICNU/101	Qualification Statement of Bradley G. Mullins
Confidential ICNU/102	Company Power Transactions by Market Hub
Confidential ICNU/103	Responses to ICNU Data Requests
Confidential ICNU/200	Confidential Opening Testimony of Bradley G. Mullins
ICNU/201	Revenue Requirement Calculations
ICNU/202	Rate Spread Impact of Generation Marginal Cost Adjustments
ICNU/203	Northwest Power and Conservation Council Planning Documents
Confidential ICNU/204	Company Responses to Data Requests
ICNU/205	Rate Spread Impact of Load Following Credit Allocation

Confidential ICNU/206	Capital Expenditure Review
ICNU/207	Selections from PGE Investor Presentations on Rate Base Additions
Confidential ICNU/208	Select Capital Addition Project Justification Forms
ICNU/209	Proposed Redline to Schedule 75
ICNU/300	Opening Testimony of Michael P. Gorman
ICNU/301	Qualifications of Michael P. Gorman
ICNU/302	Rate of Return
ICNU/303	Proxy Group
ICNU/304	Consensus Analysts' Growth Rates
ICNU/305	Constant Growth DCF Model (Consensus Analysts' Growth Rates)
ICNU/306	Payout Ratios
ICNU/307	Sustainable Growth Rate
ICNU/308	Constant Growth DCF Model (Sustainable Growth Rate)
ICNU/309	Electricity Sales are Linked to U.S. Economic Growth
ICNU/310	Multi-Stage Growth DCF Model
ICNU/311	Common Stock Market/Book Ratio
ICNU/312	Equity Risk Premium – Treasury Bond
ICNU/313	Equity Risk Premium – Utility Bond
ICNU/314	Bond Yield Spreads
ICNU/315	Treasury and Utility Bond Yields
ICNU/316	Value Line Beta
ICNU/317	CAPM Return
ICNU/318	Standard & Poor's Credit Metrics
ICNU/400	Opening Testimony of James W. Daniel
ICNU/401	List of Regulatory Proceedings
ICNU/402	PGE Response to ICNU Data Request No. 136

ICNU/403	Sample Franchise Agreement
ICNU/404	Comparison of Allocation of Franchise Fees
ICNU/405	Summary of ICNU Rate Spread Model
ICNU/406	Summary Comparison of PGE and ICNU Rate Spread
ICNU/407	Revised CIO Adjustment
Confidential ICNU/500	Confidential Supplemental Power Cost Testimony of Bradley G. Mullins

The Affidavits of Bradley G. Mullins, Michael P. Gorman, and James W. Daniel attesting to the truth and accuracy of the testimony and exhibits are attached.

Dated this 9th day of September, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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 294

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:

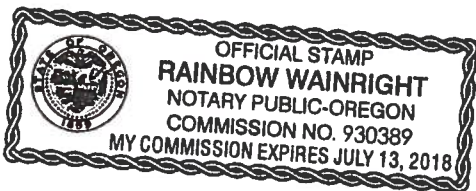
1. My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities ("ICNU") in this matter.
2. I filed testimony and exhibits (ICNU/100 – ICNU/103, ICNU/200-ICNU/209 and ICNU/500) on behalf of ICNU in this matter.
3. To the best of 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 9 day of September, 2015.



BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 9 day of September, 2015.



Rainbow Wainright
Notary Public for Oregon
County of Multnomah
My Commission Expires: July 13, 2018

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 294

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:

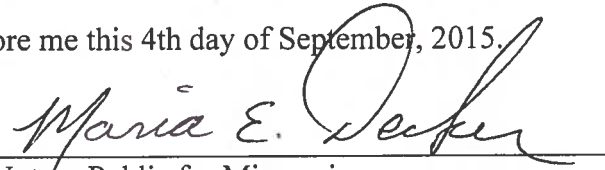
1. My name is Michael P. Gorman. I am an independent consultant testifying on behalf of the Industrial Customers of Northwest Utilities ("ICNU") in this matter.
2. I filed testimony and exhibits (ICNU/300 – ICNU/318) on behalf of ICNU in this matter.
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my answers would be the same.

SIGNED this 4th day of September, 2015.

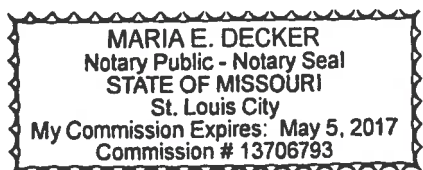


MICHAEL P. GORMAN

SUBSCRIBED AND SWORN to before me this 4th day of September, 2015.



Notary Public for Missouri
County of St. Louis
My Commission Expires: May 5, 2017



BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 294

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY


Request for a General Rate Revision

AFFIDAVIT OF
JAMES W. DANIEL

I, JAMES W. DANIEL, being first duly sworn on oath, depose and say:


1. My name is James W. Daniel. 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/407) 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 8th day of September, 2015.



JAMES W. DANIEL

SUBSCRIBED AND SWORN to before me this 8th day of September, 2015.



Notary Public for Texas
County of Travis
My Commission Expires: 08/05/2016

