

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

December 20, 2016

Via Electronic Filing

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
Application for Approval of Sale of Harborton Restoration Property (**UP 344**);
Application to Defer Revenues and Costs Related to the Environmental
Remediation Costs Recovery Adjustment, Schedule 149 (**UM 1789**); and
Schedule 149, Environmental Remediation Costs Recovery Adjustment (**UE 311**)
(*consolidated*)

Dear Filing Center:

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UP 344, UM 1789, and UE 311

In the Matters of)) PORTLAND GENERAL ELECTRIC) COMPANY,)) Application for Approval of Sale of) Harborton Restoration Project Property) (UP 344);)) Application to Defer Revenues and Costs) Related to the Environmental) Remediation Costs Recovery Adjustment,) Schedule 149 (UM 1789); and)) Schedule 149, Environmental) Remediation Costs Recovery Adjustment) (UE 311)))	MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
---	--

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 exhibit, submitted on behalf of ICNU:

Testimony & Exhibits	Description
ICNU/100	Reply Testimony of Bradley G. Mullins
ICNU/101	Qualification Statement of Bradley G. Mullins

ICNU understands that PGE plans to file a motion to admit the Joint Parties’ testimony in support of the Stipulation filed in this docket. The Affidavit of Bradley G. Mullins

attesting to the truth and accuracy of the testimony and exhibit listed above, as well as Mr. Mullins' testimony on behalf of the Joint Parties, is attached.

Dated this 20th day of December, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UP 344, UM 1789, and UE 311

In the Matters of)
)
PORTLAND GENERAL ELECTRIC)
COMPANY,)
)
Application for Approval of Sale of)
Harborton Restoration Project Property)
(UP 344);)
)
Application to Defer Revenues and Costs)
Related to the Environmental)
Remediation Costs Recovery Adjustment,)
Schedule 149 (UM 1789); and)
)
Schedule 149, Environmental)
Remediation Costs Recovery Adjustment)
(UE 311))
_____)

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 an exhibit (ICNU/100 – ICNU/101) on behalf of ICNU in this matter. In addition, along with Portland General Electric and Commission Staff, I filed joint testimony and an exhibit (Parties/100 – Parties/101).
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 ²⁰~~14~~ day of December, 2016.



BRADLEY G. MULLINS

SUBSCRIBED AND SWORN to before me this 20 day of December, 2016.



Notary Public for Oregon

County of Multnomah

My Commission Expires: 7-17-2020