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February 22, 2011

Via Electronic and U.S. Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem, OR 97308-2148

Re: In the Matter of OREGON PUBLIC UTILITY STAFF Requesting the
Commission direct PORTLAND GENERAL ELECTRIC COMPANY to
file tariffs establishing automatic adjustment clauses under the terms of SB
408
Docket No. UE 178 (4)

Dear Filing Center:

The Industrial Customers of Northwest Utilities hereby files this Cross
Examination Statement in the above referenced docket.

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

Sincerely yours,

/s/ Sarah A. Kohler
Sarah A. Kohler

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Cross Examination Statement on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, where paper service has not been waived.

Dated at Portland, Oregon, this 22nd day of February, 2011.

/s/ Sarah A. Kohler
Sarah A. Kohler

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 178(4)

In the Matter of)	
)	
OREGON PUBLIC UTILITY STAFF)	
Requesting the Commission Direct)	CROSS EXAM STATEMENT OF THE
)	INDUSTRIAL CUSTOMERS OF
PORTLAND GENERAL ELECTRIC)	NORTHWEST UTILITIES
COMPANY)	
)	
To File Tariffs Establishing Automatic)	
<u>Adjustment Clauses Under the Terms of SB 408.</u>)	

Pursuant to the Administrative Law Judges' ("ALJs") February 15, 2011 Joint Prehearing Conference Memorandum, the Industrial Customers of Northwest Utilities ("ICNU") submits this notice of intent to cross-examine witnesses in the above-referenced Docket. This cross examination statement is preliminary because PGE, Staff and the Citizens' Utility Board of Oregon ("CUB") (jointly, "Settling Parties") have not yet fully responded to ICNU's discovery requests, which are not due until noon Thursday, February 24, 2011. ICNU may revise its cross examination statement after the review of the Settling Parties' data responses. In addition, the Settling Parties may sponsor live surrebuttal at the hearing, which could expand the scope of ICNU's cross examination.^{1/} ICNU currently wishes to cross-examine the following witnesses:

^{1/} Parties are still discussing the possibility of a mutual waiver of cross examination. We will inform the ALJs of the outcome of this discussion as soon as possible.

<u>Witness</u>	<u>Party</u>	<u>Amount of Time Requested</u>	<u>Subject</u>
Bird	Staff	30 Minutes	Joint Stipulation; Testimony in Support of Stipulation; Joint Testimony in Response to ICNU
Tamlyn; Tinker	PGE	30 Minutes	Joint Stipulation; Testimony in Support of Stipulation; Joint Testimony in Response to ICNU

Dated this 22nd day of February, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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Of Attorneys for the Industrial Customers of
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